

**Division of Air Resources  
Permit Review Report**

**Permit ID: 6-9906-00006/00076**

**Renewal Number: 2**

**Modification Number: 1 02/19/2021**

**Facility Identification Data**

Name: FORT DRUM

Address: HQ 10TH MTN DIV (LI)

LEWIS & JEFFERSON CO, NY 13601

**Owner/Firm**

Name: US DEPT OF THE ARMY

Address: THE PENTAGON

WASHINGTON, DC 20310, USA

Owner Classification: Federal

**Permit Contacts**

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FORT DRUM, NY 13602-5097

Phone:3157724860

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

This modification involves the construction of a new paint booth and associated sanding booth in building P-2040. The paint booth will be equipped with a three stage filtration system exhausting

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through a single stack. During colder months the makeup air to the booth will be heated by an exempt natural gas heater. This booth and associated equipment will be used for spray coating aerospace and mobile ground support equipment. Further, this booth will be assuming the duties of the paint booth located in building P-2050. Once the paint booth in P-2040 is commissioned, the existing booth at P-2050 will be removed. The facility has opted to cap emissions of several contaminants to avoid applicability to NSR and Part 212 modelling.

This permit allows for the operation of 2 surface coating operations for the coating of vehicles, vehicle parts, and aerospace components (Emission Units U-2040P & U-4530P) and 5 gasoline dispensing stations (Emission Units U-11005, U-1485G, U-19005 ,U-1490G & U-4230G). Additionally the facility operates numerous exempt and trivial emission sources.

The facility has potential emissions of Volatile Organic Compounds (VOC), Nitrogen Oxides (NO<sub>x</sub>), and Carbon Monoxide (CO) above the major source thresholds.

The facility has a restriction on the amount of Hazardous Air Pollutants (HAP) that it can emit during any consecutive 12 month period (24 tons). This limit was placed on the facility in order to remain a minor source of HAP and avoid the requirements of 40 CFR 63 Subpart GG, Aerospace Manufacturing and Rework Facilities, 40 CFR 63 Subpart GGGGG, Site Remediation. The surface coating operations (Emission Units U-2040P & U-4530P) are subject to the VOC RACT (Reasonably Available Control Technology) requirements of 6 NYCRR Part 228, Surface Coating Processes. The gasoline dispensing stations (Emission Units U-11005, U-1485G, U-19005 ,U-1490G & U-4230G) are subject to the VOC RACT requirements of 6 NYCRR Part 230, Gasoline Dispensing Sites and Transport Vehicles. There are also 284 small boilers (between 1 and 10 mmBtu/hr) that are subject to NO<sub>x</sub> RACT tune up requirements.

**Attainment Status**

FORT DRUM is located in the town of LE RAY in the county of JEFFERSON.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO <sub>2</sub> )	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NO <sub>x</sub> )**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of

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nitrogen (NOx) which are ozone precursors.

\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor.

**Facility Description:**

Army installation with the mission of commanding the active component units and individuals assigned to the installation; providing support to all units in training to include active and reserve components for all services; and planning and supporting mobilization and training of troops.

**Permit Structure and Description of Operations**

The Title V permit for FORT DRUM

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

FORT DRUM is defined by the following emission unit(s):

Emission unit U2040P - This emission unit consists of a paint booth that will be used for spray coating of aerospace components and mobile ground support equipment. Emissions from the paint booth are vented through one stack (STK21) via a three-stage filtration system. The three stage filtration system (blanket filter, panel filter, HEPA filter) controls particulate emissions from overspray in the paint booth. The make-up air to the paint booth is heated by an exempt natural gas heater.

Emission unit U2040P is associated with the following emission points (EP):  
STK21

Process: 029 is located at Building 2040 - This process is the spray coating of aerospace components and mobile ground support equipment. Coatings are applied using a high volume low pressure (HVLP) sprayer or a manual airbrush inside the paint booth.

Emission unit U4530P - This emission unit consists of a paint booth with dry arrestor type filters. It is used primarily for painting vehicles and vehicle parts.

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Emission unit U4530P is associated with the following emission points (EP):

STK02

Process: 002 is located at Main, Building 4530 - Emissions from the operation of a spray paint booth that coats vehicles and vehicle components.

Emission unit U1485G - The emission unit contains one (1) 12,000 gallon above ground storage tank equipped with stage I vapor recovery and two (2) 6,000 gallon above ground storage tanks equipped with stage I vapor recovery. This emission unit dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES), Building 1485

Emission unit U1485G is associated with the following emission points (EP):

STK16, STK17, STK18

Process: 021 is located at Building 1485 - Motor vehicles are refueled at dispensing pumps. Emissions are fugitive. Emissions are controlled by onboard vehicle refueling systems.

Process: 022 is located at Building 1485 - Fugitive emissions resulting from fuel spillage during dispensing

Process: 023 is located at Building 1485 - Aboveground storage tanks filled using submerged loading from dedicated service tank trucks with a balanced Stage I vapor recovery system.

Process: 024 is located at Building 1485 - Emissions resulting from aboveground storage tank breathing losses.

Emission unit U1490G - This emission unit consists of two (2) 12,000 gallon above ground storage tank (AST) equipped with Stage I submerged loading using dedicated vapor balance. This facility dispenses motor gasoline to vehicles at the Petroleum, Oil, and Lubricants (POL) Yard, Building 1490.

Emission unit U1490G is associated with the following emission points (EP):

STK12, STK13

Process: 015 is located at POL, Building 1490 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 016 is located at POL, Building 1490 - Emissions resulting from underground storage tank breathing losses.

Process: 017 is located at POL, Building 1490 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by onboard vehicle refueling systems.

Process: 018 is located at POL, Building 1490 - Emissions resulting from fuel spillage.

Emission unit UBLRNG - This emission unit consists of 284 natural gas fired boilers with a maximum heat input capacity greater than 1 mmBtu/hr and not exceeding 10 mmBtu/hr.

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Process: NG1 This process consists of 284 natural gas fired boilers with a maximum heat input capacity greater than 1 mmBtu/hr and not exceeding 10 mmBtu/hr.

Emission unit U4230G - Three 10,000 gallon underground storage tanks (UST) equipped with Stage I submerged loading using dedicated vapor balance. This facility dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES), Building 4230.

Emission unit U4230G is associated with the following emission points (EP):  
STK06, STK07, STK08

Process: 007 is located at AAFES, Building 4230 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 008 is located at AAFES, Building 4230 - Emissions resulting from underground storage tank breathing losses.

Process: 009 is located at AAFES, Building 4230 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by onboard vehicle refueling systems.

Process: 010 is located at AAFES, Building 4230 - Emission resulting from fuel spillage.

Emission unit U19005 - This emission unit consists of one (1) 20,000 and one (1) 15,000 gallon underground storage tanks (UST) equipped with stage I submerged loading using dedicated vapor balance. Emissions during vehicle refueling are controlled by ORVR. This facility dispenses motor gasoline to vehicles at the Airfield Station, Building 19005

Emission unit U19005 is associated with the following emission points (EP):  
STK19, STK20

Process: 025 is located at Building 19005 - Motor vehicles are refueled at dispensing pumps. Fugitive vapors are collected by onboard vehicle refueling systems.

Process: 026 is located at Building 19005 - Fugitive emissions resulting from fuel spillage.

Process: 027 is located at Building 19005 - Underground storage tanks filled using submerged loading with a balanced stage I vapor recovery system

Process: 028 is located at Building 19005 - Emissions resulting from underground storage tanks breathing losses

Emission unit U11005 - Three 10,000 gallon underground storage tanks (UST) equipped with Stage I submerged loading using dedicated vapor balance. This facility dispenses motor gasoline to vehicles at the Army and Air Force Exchange Service (AAFES), Building 11005.

Emission unit U11005 is associated with the following emission points (EP):

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Process: 011 is located at AAFES, Building 11005 - Underground storage tanks filled using submerged loading with a balanced Stage I vapor recovery system.

Process: 012 is located at AAFES, Building 11005 - Emissions resulting from underground storage tank breathing losses.

Process: 013 is located at AAFES, Building 11005 - Motor vehicles are refueled at the dispensing pumps. Fugitive vapors are collected by onboard vehicle refueling systems

Process: 014 is located at AAFES, Building 11005 - Emission resulting from fuel spillage.

**Title V/Major Source Status**

FORT DRUM is subject to Title V requirements. This determination is based on the following information:

The facility has potential emissions of Volatile Organic Compounds (VOC), Nitrogen Oxides (NOx), and Carbon Monoxide (CO) above the major source thresholds.

The facility has a restriction on the amount of Hazardous Air Pollutants (HAP) that it can emit during any consecutive 12 month period (24 tons). This limit was placed on the facility in order to remain a minor source of HAP and avoid the requirements of 40 CFR 63 Subpart GG, Aerospace Manufacturing and Rework Facilities, 40 CFR 63 Subpart GGGGG, Site Remediation. The surface coating operations (Emission Units U-2040P & U-4530P) are subject to the VOC RACT (Reasonably Available Control Technology) requirements of 6 NYCRR Part 228, Surface Coating Processes. The surface coating operation at emission unit U-2040P is restricted to emit 38 tons during any 12 month period to avoid applicability to New Source Review. The gasoline dispensing stations (Emission Units U-11005, U-1485G, U-19005 ,U-1490G, & U-4230G) are subject to the VOC RACT requirements of 6 NYCRR Part 230, Gasoline Dispensing Sites and Transport Vehicles. There are also 284 small boilers (between 1 and 10 mmBtu/hr) that are subject to NOx RACT tune up requirements.

**Program Applicability**

The following chart summarizes the applicability of FORT DRUM with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO

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NESHAP (40 CFR Part 61)	YES
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

**MACT** Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS** New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV** Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI** Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available,

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considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

**SIC Code**

**Description**

9711	NATIONAL SECURITY
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**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

**SCC Code**

**Description**

1-03-006-03	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/ INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
4-02-024-01	Less Than 10 MMBtu/Hr SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - LARGE AIRCRAFT Prime Coating Operation
4-02-999-95	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - MISCELLANEOUS Specify in Comments Field
4-03-012-01	PETROLEUM PRODUCT STORAGE AT REFINERIES PETROLEUM PRODUCT STORAGE - VARIABLE VAPOR SPACE
4-04-004-03	Gasoline RVP 13: Filling Loss BULK TERMINALS/PLANTS BULK TERMINALS/PLANTS FOR PETROLEUM PRODUCTS - UNDERGROUND TANKS
4-04-004-05	Gasoline RVP 10: Breathing Loss BULK TERMINALS/PLANTS



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4-06-001-37	BULK TERMINALS/PLANTS FOR PETROLEUM PRODUCTS - UNDERGROUND TANKS Gasoline RVP 7: Breathing Loss TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS
4-06-001-41	CRUDE OIL: SPLASH LOADING (NORMAL SERVICE) TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TANK CARS AND TRUCKS GASOLINE: SUBMERGED LOADING (BALANCED SERVICE)
4-06-004-02	TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS FILLING VEHICLE GAS TANKS - STAGE II
4-06-004-03	Liquid Spill Loss w/o Controls TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS FILLING VEHICLE GAS TANKS - STAGE II
4-06-006-03	Vapor Loss w/o Controls TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS CONSUMER (CORPORATE) FLEET REFUELING - STAGE II
4-06-888-01	VAPOR LOSS W/CONTROLS TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS TRANSPORTATION AND MARKETING OF PETROLEUM PRODUCTS - FUGITIVE EMISSION Specify in Comments Field

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

<b>Cas No.</b>	<b>Contaminant</b>	<b>PTE lbs/yr</b>	<b>PTE tons/yr</b>	<b>Actual lbs/yr</b>	<b>Actual tons/yr</b>
000084-74-2	1,2-BENZENEDICARB OXYLIC ACID, DIBUTYL ESTER	20			
000108-10-1	2-PENTANONE, 4-METHYL	12172			

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000075-07-0	ACETALDEHYDE	200	
000107-02-8	ACROLEIN	200	
000071-43-2	BENZENE	280	
000098-82-8	BENZENE, (1- METHYLETHYL)	1229	
000095-63-6	BENZENE, 1,2,4-	9191	
026447-40-5	TRIMETHYL- BENZENE, 1,1	10862	
000095-47-6	MEYHYLENEBIS ISOCYANATO-	43.9	
004083-64-1	BENZENE, 1,2- DIMETHYL	3520	
000095-47-6	BENZENESULFON YL		
000095-47-6	ISOCYANATE, 4-METHYL-		
0NY750-00-0	CARBON DIOXIDE		275137
000630-08-0	EQUIVALENTS CARBON	406400	
000108-90-7	MONOXIDE		
010588-01-9	CHLOROBENZENE	2.88	
000095-47-6	CHROMIC ACID	0.000018	
000095-47-6	DISODIUM SALT		
0NY051-24-0	CHROMIUM (CR 051)	9.19	
0NY057-27-0	COBALT (CO 057)	0.01	
028182-81-2	DIISOCYANATE, 1-6-	26868	
000079-00-5	HEXAMETHYLENE ETHANE,	2.88	
000112-07-2	1,1,2- TRICHLORO	5125	
000124-17-4	ETHANOL, 2- BUTOXY-, ACETATE	4855	
000100-41-4	ETHANOL, 2 (2- BUTOXYETHOXY) -, ACETATE	3215	
000050-00-0	ETHYLBENZENE	2030	
000110-54-3	FORMALDEHYDE	8503	
000822-06-0	HEXANE	2116	
007439-92-1	HEXANE, 1,6- DIISOCYANATO-	0.0007	
000067-56-1	LEAD	115.8	
000078-93-3	METHYL ALCOHOL	35399	
000101-68-8	METHYL ETHYL KETONE	16000	
000121-44-8	METHYLENE BISPHENYL ISOCYANATE	17370	
000091-20-3	N,N-DIETHYL ETHANAMINE	3.7	
0NY059-28-0	NAPHTHALENE	1.29	
008007-18-9	NICKEL (NI 059)	1.29	
000091-20-3	NICKEL		
000091-20-3	ANTIMONY		
000091-20-3	TITANIUM		
0NY210-00-0	YELLOW RUTILE OXIDES OF NITROGEN	594800	

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0NY075-00-0	PARTICULATES	80000
000540-84-1	PENTANE, 2,2,4- TRIMETHYL-	78.11
000108-95-2	PHENOL	1.75
0NY075-02-5	PM 2.5	40000
0NY075-00-5	PM-10	39940
007789-06-2	STRONTIUM CHROMATE	6.91
000100-42-5	STYRENE	0.54
007446-09-5	SULFUR DIOXIDE	4600
000108-88-3	TOLUENE	2040
0NY100-00-0	TOTAL HAP	41964
0NY998-00-0	VOC	177886
001330-20-7	XYLENE, M, O & P MIXT.	16665

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)**

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

**Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)**

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)**

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

**Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or

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termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

**Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)**

This permit does not convey any property rights of any sort or any exclusive privilege.

**Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)**

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

**Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)**

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)**

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable

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requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**Item K: Permit Exclusion - ECL 19-0305**

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

**Item L: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

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An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement. item\_02

**Item B: General Provisions for State Enforceable Permit Terms and Condition - 6  
NYCRR Part 201-5**

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
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FACILITY	ECL 19-0301	67		Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-IIII	52		Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
FACILITY	40CFR 60-JJJJ	53		Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
FACILITY	40CFR 63-CCCCC.11115	54		General duties to minimize emissions
FACILITY	40CFR 63-CCCCC.11118	55		Requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more
FACILITY	40CFR 63-CCCCC.11120	56		Testing and monitoring requirements
FACILITY	40CFR 63-JJJJJJ	57		National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
FACILITY	40CFR 63-ZZZZ	58		Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19		Chemical accident prevention provisions
FACILITY	40CFR 80	59		Regulation of fuels and fuel additives.
FACILITY	40CFR 82-F	20		Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	40CFR 93-B	60		General Conformity
FACILITY	6NYCRR 200.6	1		Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10, 1	-2	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	68		Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11		Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12		Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13		Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14		Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 61, 62		Title V Permits and

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FACILITY	6NYCRR 201-6.4(a)(4)	15		the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(7)	2		General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(8)	16		General Conditions - Fees
FACILITY	6NYCRR 201-6.4(c)	3		General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)(2)	4		Recordkeeping and Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii)	5		Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	22		Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6		Compliance Certification
FACILITY	6NYCRR 201-6.4(f)	23		Operational Flexibility
FACILITY	6NYCRR 201-6.4(f)(6)	17		Off Permit Changes
FACILITY	6NYCRR 201-6.4(g)	24, 1	-1	Permit Shield
FACILITY	6NYCRR 201-6.5(a)	69		State Enforceable Requirements
FACILITY	6NYCRR 201-7.1	25		Emission Capping in Facility Permits
FACILITY	6NYCRR 202-1.1	18		Required emissions tests.
FACILITY	6NYCRR 202-2.1	7		Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8		Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	70		General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	28		General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-2.1(a)	1	-12, 1 -13, 1 -14, 1 -15	HTACs applicable to Table 212-2.3 Table 4
FACILITY	6NYCRR 215.2	9		Open Fires - Prohibitions
FACILITY	6NYCRR 225-3.4(c)	29		Gasoline record keeping requirements for retail or wholesale purchases - consumers
FACILITY	6NYCRR 225-3.4(d)	30		Maintenance and availability of gasoline records
FACILITY	6NYCRR 226-1.3	31		General Requirements
FACILITY	6NYCRR 226-1.4(a)	32		Cold cleaning controls (internal volume greater than two gallons)
FACILITY	6NYCRR 226-1.5(a)	33		Cold cleaning degreasing
FACILITY	6NYCRR 227-1.3(a)	34		Smoke Emission Limitations.



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FACILITY	6NYCRR 227-1.6(b)	35	Corrective Action: Facility Shutdown.
FACILITY	6NYCRR 227-1.6(c)	36	Corrective Action: Facility Shutdown Prohibitions.
FACILITY	6NYCRR 227-1.6(d)	37	Corrective Action: Facility Shutdown Prohibitions.
FACILITY	6NYCRR 227-1.7(a)	38	General Emission Data.
FACILITY	6NYCRR 227-1.7(b)	39	General Test Methods.
U-BLRNG	6NYCRR 227-2.4(d)	66	Small boilers, small combustion turbines, and small stationary internal combustion engines.
FACILITY	6NYCRR 228-1.1(a)(3)	40	Once in always in
FACILITY	6NYCRR 228-1.3(a)	1 -5	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3(b)	1 -6	Surface Coating General Requirements- Recordkeeping
U-2040P	6NYCRR 228-1.3(b)(1)	1 -11	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3(c)	42	Surface Coating General Requirements- Prohibitions
FACILITY	6NYCRR 228-1.3(d)	1 -7	Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.3(e)	1 -8	Surface Coating - General control requirements (Class A & most B)
FACILITY	6NYCRR 228-1.3(e)(2)	43	Use of 55 gallons of non-compliant coating
FACILITY	6NYCRR 228-1.4(a)(2)	44	Table A - Class A VOC limits
FACILITY	6NYCRR 228-1.4(e)(2)	1 -9	VOC limits for tablet, glass, leather, aerospace, urethane
FACILITY	6NYCRR 228-1.6(a)	45	Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6(c)	46	Surface coating access for sampling
FACILITY	6NYCRR 228-1.6(h)	47	Records reporting and maintaining
FACILITY	6NYCRR 230.2(f)	49	Requirements
FACILITY	6NYCRR 230.5(a)	50	Gasoline Dispensing Sites - Recordkeeping and Reporting.
FACILITY	6NYCRR 230.5(c)	51	Gasoline dispensing sites - recordkeeping and reporting.

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the

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Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

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This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 201-6.4 (g)

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Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, FORT DRUM has been determined to be subject to the following regulations:

40 CFR 63.11115

This regulation outlines general duties to minimize emissions at facilities subject to 40 CFR 63 Subpart CCCCCC.

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40 CFR 63.11118

This regulation outlines requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more at facilities subject to 40 CFR 63 Subpart CCCCCC.

40 CFR 63.11120

This regulation outlines testing and monitoring requirements at facilities subject to 40 CFR 63 Subpart CCCCCC.

40 CFR Part 60, Subpart IIII

This regulation defines performance standards for compression ignition stationary reciprocating internal combustion engines.

40 CFR Part 60, Subpart JJJJ

This regulation defines performance standards for stationary spark ignition stationary reciprocating internal combustion engines.

40 CFR Part 63, Subpart JJJJJ

This regulation covers facilities that own or operate an industrial, commercial, or institutional boiler as defined in §63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in §63.2, except as specified in §63.11195.

40 CFR Part 63, Subpart ZZZZ

This regulation defines performance standards for stationary reciprocating internal combustion engines

40 CFR Part 80

40 CFR Part 93, Subpart B

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6 NYCRR 201-6.4 (f)

This section describes the operational flexibility protocol proposed by the facility. The protocol will allow the facility owner or operator to make certain changes at the facility without the need for a permit modification. Changes made pursuant to the protocol must be approved by the Department, and will be rolled into the permit during the next renewal or modification.

6 NYCRR 201-6.5 (a)

This section identifies state enforceable requirements for Title V permits.

6 NYCRR 201-7.1

6 NYCRR 211.1

This regulation requires that no person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212-2.1 (a)

6 NYCRR 225-3.4 (c)

This regulation sets forth the requirements for records to be maintained on each delivery of gasoline to the facility. The records will include a certification that the gasoline conforms with applicable Reid vapor pressure (RVP) and oxygen content as specified in 225-3, documentation of maximum RVP of the gasoline, time periods when the gasoline is intended to be dispensed and the shipment quantity.

6 NYCRR 225-3.4 (d)

This regulation requires the facility to maintain records that may be required under 6 NYCRR Part 225-3.4(a), (b) or (c). These records must be made available to the commissioner or his or her representative, for inspection during normal business hours, at the location from which the gasoline was delivered, sold, or dispensed.

6 NYCRR 226-1.3

This section lists the general requirements for owners or operators conducting solvent cleaning processes.

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6 NYCRR 226-1.4 (a)

This section describes the equipment specifications and control requirements for cold cleaners.

6 NYCRR 226-1.5 (a)

This subpart describes the operating practices required by an owner or operator conducting solvent cleaning.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6 NYCRR 227-1.6 (c)

This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6 NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6 NYCRR 227-1.7 (a)

This regulation requires any stationary combustion installation described in section 6 NYCRR 227-1.2 of this Part, to provide pertinent emissions data upon request by the Department..

6 NYCRR 227-1.7 (b)

This specifies the requirement for acceptable fuel sample test methods.

6 NYCRR 227-2.4 (d)

This section includes NO<sub>x</sub> RACT requirements for small boilers, small combustion turbines, and small stationary internal combustion engines.

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6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.3 (a)

requires that no owner or operator of a process emission source shall emit greater than 20 percent opacity, based upon the six minute average in reference test method 9. The facility will conduct a method 9 should records demonstrate that the quantity of coatings and cleaning solvents used on an annual basis does not exceed 55 gallons (or 400 pounds of actual VOC usage from coatings and cleaning solutions) on a 12 month rolling basis. In addition, the facility will maintain a bound opacity logbook.

6 NYCRR 228-1.3 (b)

the facility maintain records for each coating class separately to allow for independent verification that VOC limits for each Class A and Class E coating lines are being met.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.3 (d)

6 NYCRR 228-1.3 (e)

the owner or operator of a facility subject to 6 NYCRR 228 to complete best practices tasks to minimize emissions of VOC. The facility is required to keep a logbook of daily inspections noting the date, time, items observed, and corrective action taken. This activity is to take place daily while in operation and reported upon semi annually



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6 NYCRR 228-1.3 (e) (2)

This citation allows any facility to use up to 55 gallons of coatings (facility wide) on a 12-month rolling total basis which does not comply with the VOC content limits required by the regulation.

6 NYCRR 228-1.4 (a) (2)

6 NYCRR 228-1.4 (e) (2)

class E aerospace coating lines may not use coatings with VOC contents which exceed 5.1 pounds per gallon of coating.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR 230.2 (f)

Owners and/or operators of gasoline storage tanks, vehicles, and dispensing stations required to install stage 1 and/or stage 2 vapor recovery equipment must meet these provisions. The provisions include training, correct operation, replacement, and repair of personnel and equipment.

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6 NYCRR 230.5 (a)

This section requires record keeping of delivered fuel which must be maintained for two years.

6 NYCRR 230.5 (c)

This regulation requires a gasoline dispensing site to post their copy of the registration form obtained from the NYSDEC.

**Non Applicability Analysis**

**List of non-applicable rules and regulations:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Short Description</b>
FACILITY	40 CFR Part 63, Subpart GG	Subpart GG - Aerospace Manufacturing NESHAP
Reason: The facility has capped out of this regulation.		
FACILITY	40 CFR Part 63, Subpart GGGGG	Site Remediation NESHAP
Reason: The facility has capped out of this regulation.		
FACILITY	40 CFR Part 63, Subpart HHHHHH	NESHAP for Paint Stripping and Misc. Surface Coating Operations at Area Sources

Reason: 40 CFR 63 Subpart HHHHHH does not apply to Fort Drum according to 63.11169 (d)(1):

"This subpart does not apply to any of the activities described in paragraph (d)(1).

(1) Surface coating or paint stripping performed on site at installations owned or operated by the Armed Forces of the United States (including the Coast Guard and the National Guard of any such State), the National Aeronautics and Space Administration, or the National Nuclear Security Administration."

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that

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a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

**Compliance Certification**

**Summary of monitoring activities at FORT DRUM:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	23	record keeping/maintenance procedures
FACILITY	1-3	monitoring of process or control device parameters as surrogate
FACILITY	1-4	monitoring of process or control device parameters as surrogate
U-2040P	1-10	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	1-12	monitoring of process or control device parameters as surrogate
FACILITY	1-13	monitoring of process or control device parameters as surrogate
FACILITY	1-14	record keeping/maintenance procedures
FACILITY	1-15	monitoring of process or control device parameters as surrogate
FACILITY	29	record keeping/maintenance procedures
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures
FACILITY	32	monitoring of process or control device parameters as surrogate
FACILITY	33	work practice involving specific operations
FACILITY	34	monitoring of process or control device parameters as surrogate
U-BLRNG	66	record keeping/maintenance procedures
FACILITY	1-5	monitoring of process or control device parameters as surrogate
FACILITY	1-6	record keeping/maintenance procedures
U-2040P	1-11	record keeping/maintenance procedures
FACILITY	1-7	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	monitoring of process or control device parameters as surrogate
FACILITY	1-9	monitoring of process or control device parameters as surrogate
FACILITY	45	monitoring of process or control device parameters as surrogate
FACILITY	47	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
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**Basis for Monitoring**

**Basis for Monitoring**

Condition 5 – 6 NYCRR 201-6.4(c)(3)(ii) : This condition requires the submission of semi-annual monitoring reports to demonstrate compliance with applicable requirements. These reports shall be submitted to the Department within 30 days after the end of the reporting period. All instances of deviations from permit requirements must clearly be indicated in addition to any corrective action taken. This condition further details additional requirements pertaining to these reports.

Condition 6 – 6 NYCRR 201-6.4 (e) - Compliance certifications must be submitted annually including all required information as laid out by this permit

Condition 7- 6 NYCRR 202-2.1 - Emission statements must be submitted on or before April 15th of each year for emissions of the previous calendar year.

Condition 23 – 6 NYCRR 201-6.4 (f) – This condition outlines the operational flexibility plan for this facility. It outlines physical changes and changes in the method of operation which otherwise would require a permit modification. Further, this condition outlines the protocol for operation under an operational flexibility plan.

Condition 1-2 – 6 NYCRR 201-7.1 – This condition is a facility cap on individual Hazardous Air Pollutants (HAPs). Each individual HAP shall be limited to 9 tons during any 12 month period. The facility must maintain records that verify the facility's monthly emissions of each HAP. These records must be maintained at the facility for a period of five years. The facility must maintain records that each HAP, including exempt and trivial activities, does not exceed 9 tons per year. This condition will be monitored monthly and reported upon annually.

Condition 1-1 – 6 NYCRR 201-7.1 – This condition is a facility cap on total Hazardous Air Pollutants (HAPs). Total HAP shall be limited to 24 tons during any 12 month period. The facility must maintain records that verify the facility's monthly emissions all HAPs. These records must be maintained at the facility for a period of five years. The facility must maintain records that total HAP, including exempt and trivial activities, does not exceed 24 tons per year. This condition will be monitored monthly and reported upon annually.

Condition 29 – 6 NYCRR 225-3.4 (c) – This condition requires the each retailer of gasoline to maintain records regarding gasoline shipments. The facility is required to maintain records that demonstrate the gasoline Reid vapor pressure and oxygen content, designation of the appropriate time period in which the gasoline is intended to be dispensed, shipment quantity and date of shipment of gasoline.

Condition 30 – 6 NYCRR 225-3.4 (d) – This condition requires that records required to be maintained by 6 NYCRR Part 225-3.4 must be kept at the location from which gasoline was delivered, sold or dispensed. Records must be available upon request during normal business hours.

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Condition 31 – 6 NYCRR 226 – This condition outlines the requirements for cold cleaning degreasers. This condition outlines equipment specifications, operating requirements, and best practice general requirements. The facility will maintain a log of instances when these requirements were not met. This condition must be reported upon semi annually.

Condition 32 – 6 NYCRR 226-1.4(a) – This condition specifies control requirements for facilities conducting solvent cleaning.

Condition 33 – 6 NYCRR 226-1.5(a) – This condition specifies that cleaned parts in cold cleaning degreasers shall be drained at least 15 seconds or until dripping ceases.

Condition 34 – 6 NYCRR 227-1.3 (a) – This condition requires that no owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9. The facility will conduct a method 9 upon request of the regulatory agency.

Condition 1-3 – 6 NYCRR 228-1.3 (a) - This condition requires that no owner or operator of a process emission source shall emit greater than 20 percent opacity, based upon the six minute average in reference test method 9. The facility will conduct a method 9 should records demonstrate that the quantity of coatings and cleaning solvents used on an annual basis does not exceed 55 gallons (or 400 pounds of actual VOC usage from coatings and cleaning solutions) on a 12 month rolling basis. In addition, the facility will maintain a bound opacity logbook.

Condition 1-4 – 6 NYCRR 228-1.3 (b) – This condition requires that the facility maintain records for each coating class separately to allow for independent verification that VOC limits for each Class A and Class E coating lines are being met.

Condition 43 – 6 NYCRR 228-1.3 (e) (2) – This condition allows a facility containing a coating line (other than a class A coating line) to use up to 55 gallons of coatings on a 12 month rolling total that does not comply with the VOC content limits outlined in 228-1.43. This use must be recorded on an as used basis and maintained for five years. This condition is a 12 month rolling total monitored monthly are reported upon semi annually.

Condition 44 – 6 NYCRR 228-1.4 (a)(2) – This condition states mobile equipment repair and refinishing or color matched coating line may not use coatings with VOC contents which exceed 7.0 pounds per gallon of coating.

Condition 45 – 6 NYCRR 228-1.6 (a) – Requires the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must, at the request of the Department, determine actual VOC content. Actual content will be determined as applied by measuring volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA method 311 or method 24.

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Condition 47 – 6 NYCRR 228-1.6(h) – This condition requires that any records demonstrating non compliance with 6 NYCRR 228-1 must be reported to the Department within 30 days following notice or generation of the information. All records must be maintained for five years.

Condition 1-6 – 6 NYCRR 228-1.3 (e) – This condition requires the owner or operator of a facility subject to 6 NYCRR 228 to complete best practices tasks to minimize emissions of VOC. The facility is required to keep a logbook of daily inspections noting the date, time, items observed, and corrective action taken. This activity is to take place daily while in operation and reported upon semi annually.

Condition 1-7 - 6 NYCRR 228-1.4 (e)(2) - This condition states class E aerospace coating lines may not use coatings with VOC contents which exceed 5.1 pounds per gallon of coating.

Condition 1-8 – 6 NYCRR Part 201-7.1 – This condition establishes a cap on VOC emissions from emission unit U-P2040P. This cap allows the facility to avoid a New Source Review application for the installation of this emission unit. VOC is limited to 38 tons per year on a 12 month rolling basis. The facility must maintain records that verify the facility’s monthly emissions of each VOC. These records must be maintained at the facility for a period of five years. The facility must maintain records that each VOC, including exempt and trivial activities, does not exceed 38 tons per year. This condition will be monitored monthly and reported upon annually.

Condition 49 – 6 NYCRR 230.2 (f) – This condition requires the owner/operator of gasoline dispensing sites to install and maintain stage I vapor recovery. This condition also includes requirements on operation and equipment replacement. This requirement shall be reported upon semi annually.

Condition 50 – 6 NYCRR 230.5 (a) – This condition requires the facility to maintain records showing the quantity of all gasoline delivered to the site. these records must be maintained at the gasoline dispensing site for at least two years and must be readily available at any reasonable time.

Condition 55 – 40 CFR 63 CCCCCC – This condition outlines requirements for facilities with monthly throughput of 100,000 gallons of gasoline or more. This condition outlines management practices, control technologies, and testing requirements. The facility shall report on this condition semi annually.

Condition 56 – 40 CFR 63 CCCCCC – This condition outlines testing and monitoring requirements for owners and operators of facilities subject to 40 CFR CCCCCC. This requirement includes testing requirements and test methods to demonstrate compliance. The facility shall report on this condition semi annually.

Condition 59 – 40 CFR Part 80 – This condition outlines the regulations of fuels and fuel additives. The Department has not been delegated this regulation and compliance will be determined by the US EPA

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Condition 60 – 40 CFR 93, subpart B – the permittee shall comply with the requirements for general conformity as specified in 40 CFR 51, subpart W sections 853-860 concerning federal actions and their impact on ability of the region to attain or continue to attain the NAAQS. This condition will be reported on semi annually.

Condition 1-9 – 6 NYCRR 228-1.3 (b)(1) – This condition requires that that an emission sources subject to 228-1 must maintain records in a format acceptable to the Department for at least five years. The records required include parameters used to determine actual VOC content of coatings, purchase and usage records of each coating, removal efficiency of each air cleaning device, parameters used to calculate removal efficiency of air cleaning devices, any additional information required to demonstrate compliance with 228-1.

Condition 1-10 – 6 NYCRR 212-2.1 (a) – This condition requires that the facility limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit of Formaldehyde. Facility owner must maintain records that verify the facility's monthly formaldehyde emissions. These records must be maintained at the facility for a period of five years. Facility will submit a report annually, in a format acceptable to the commissioner's representative, which documents that the facility's formaldehyde emissions over any consecutive 12 month period were below 99 pounds. Monthly emissions of formaldehyde shall be summed with the previous 11 months total to produce a 12 month rolling total. The annual report must include information that documents the emissions of formaldehyde from each emission source at the facility, including exempt and trivial activities.

Condition 1-11 – 6 NYCRR 212-2.1 (a) – This condition requires that the facility limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit of chromium (VI) compounds. Facility owner must maintain records that verify the facility's monthly chromium (VI) compound emissions. These records must be maintained at the facility for a period of five years. Facility will submit a report annually, in a format acceptable to the commissioner's representative, which documents that the facility's chromium (VI) compounds emissions over any consecutive 12 month period were below 0.1 pounds. Emissions of each chromium (VI) compound shall be summed with the other chromium (VI) compounds monthly and added to the previous 11 months total to produce a 12 month rolling total. The annual report must include information that documents the emissions for each chromium (VI) compound from each emission source at the facility, including exempt and trivial activities.

Condition 1-12 – 6 NYCRR 212-2.1 (a) - This condition requires that the facility limit the process emissions of each High Toxicity Air Contaminant (HTAC) to the applicable mass emission limit specified in table 2 of subpart 212-2.2. Records will be maintained on an annual basis and be incorporated into a report documenting monthly emissions of each HTAC.

Condition 1-13 – 6 NYCRR 212-2.1 (a) - This condition requires the facility to limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit of diisocyanate compounds. Facility owner must maintain records that verify the facility's monthly diisocyanate emissions. These records must be maintained at the facility for a period of five years. Facility will submit a report annually, in a format acceptable to the commissioner's

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representative, which documents that the facility's diisocyanate emissions over any consecutive 12 month period were below 99 pounds. Emissions of each diisocyanate compound shall be summed with the other diisocyanate compounds monthly and added to the previous 11 months total to produce a 12 month rolling total. The annual report must include information that documents the emissions for each diisocyanate compound from each emission source at the facility, including exempt and trivial activities.

Condition 66 – 6 NYCRR 227-2.4 (d) – The owner or operator of a small boiler, small combustion turbine, or small internal combustion engine must perform an annual tune up of their equipment. This tune up should be performed in accordance with the requirements of DAR-5. Records of each tune up must be kept on site for a minimum of five years. This condition is monitored annually and reported upon annually.

Climate Leadership and Community Protection Act (CLCPA)

The potential climate impacts of this significant permit modification were evaluated in accordance with the requirements of Section 7(2) of CLCPA. The facility is shutting down a similar source as is being constructed, resulting in an offset of greenhouse gas emissions. In addition, this modification will result in improved control of volatile organic compounds emitted by this facility. For these reasons, the Department has approved this project.



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