



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

SEP 19 2019

Mr. Steven Flint
Director, Division of Air Resources
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12233-3251

Dear Mr Flint:

The Environmental Protection Agency, Region 2, Air and Radiation Division continues to devote additional effort to address the numerous source-specific State Implementation Plan (SIP) revisions submitted by New York State Department of Environmental Conservation (NYSDEC) regarding NO_x and VOC Reasonably Available Control Technology (RACT) determinations. These RACT SIP revisions were mainly submitted in batches on September 16, 2008 and August 30, 2010, with a few pre-2000 SIPs included. Note for the purpose of this letter, we are not including the cement and glass plant SIPs that were submitted in 2013 pursuant to 6 NYCRR Part 220. Based on our initial review, we have determined the source-specific SIP revisions can be grouped into three different categories: (1) SIPs ready for rulemaking; (2) SIPs for facilities or processes which are no longer in operation, may have shut-down, or no longer need RACT approval, and (3) SIPs needing more substantive additional information/clarification.

Table 1 represents the RACT SIP revisions that will continue to be reviewed for SIP rulemaking purposes. However, we have determined the Title V Operating Permits for these facilities have either been recently renewed or are up for renewal within a year. EPA requests a copy of those updated permits be submitted to EPA as a supplement to the previously submitted RACT SIP in order to proceed with SIP rulemaking.

Facility	Description	Regional Office
Ametek Rotron Technical Motors Div.	Needs supplemental submittal with new permit	3
Commonwealth Plywood	Needs supplemental submittal with new permit	5
Finch Paper LLC	Needs supplemental submittal with new permit	5
Globe Metallurgical Inc.	Needs supplemental submittal with new permit	9
International Paper	Needs supplemental submittal with new permit	5
Knowlton Specialty Papers	Needs supplemental submittal with new permit	6
Metal Cladding Inc.	Needs supplemental submittal with new permit	9
Northeast Solite Corp.	Needs supplemental submittal with new permit	3
Pactiv Corporation	Needs supplemental submittal with new permit	8
TAM Ceramics LLC	Needs supplemental submittal with new permit	9
US Gypsum Co – Oakfield Plant	Needs supplemental submittal with new permit	8
Utica Metal Products	Needs supplemental submittal with new permit	6

The second category of RACT SIPs relates to facilities or emission units that appear to no longer be in operation, or which no longer need a SIP approval. Table 2 identifies those RACT SIPs. EPA requests NYSDEC confirm these findings and formally request withdrawal of these RACT SIPs.

Table 2		
Facility	Description	Regional Office
American Packaging	No Title V in NYSDEC records. Facility not listed in Enforcement Compliance History Online (ECHO)	8
Art Resoration by Demetrius	Unable to find any Facility information in ECHO or on the internet.	2
Bestfoods Baking Company/Entenmann's	ECHO lists facility as permanently closed	1
Cornell Central Heating	Boiler removed from permit in 2015	7
Craft-Pak Inc.	No Title V in NYSDEC records. Facility not listed in ECHO	2
Dominion Transmission/Woodhull Station	Unit is no longer operational	7
Franklin Poly Corp	No Title V in NYSDEC records. Facility not listed in ECHO	2
GE Nott Street	No Title V in NYSDEC records. Facility not listed in ECHO	4
Independent Cement Corp	Closed in 2011 (Holsim?)	4
Interstate Brands	No Title V in NYSDEC records. Facility not listed in ECHO	2
MRC Bearings	No Title V in NYSDEC records. Facility permanently closed as per ECHO	9
Newton Falls Paper Co.	Facility closed in 2011	6
Norbord Industries	Facility not found in ECHO	4

The third category of RACT SIPs are stalled because more substantive information is needed. For the facilities listed in Table 3 below, EPA is requesting NYSDEC submit the most current Title V Operating Permit which includes the appropriate RACT determination for the facility, along with the RACT determination. In some instances the RACT limits as contained in the most recently available Title V permit have changed from when the SIP that was originally submitted to EPA. Upon submittal of this more recent information, EPA can proceed in reevaluating the RACT SIP and determine if we should proceed with the rulemaking process for the particular SIP revision. We have already contacted either the lead staff in your central office or the permit writer in the respective NYSDEC Regional Office for these facilities and they are aware of this request for more information.

Table 3		
Facility	Description	Regional Office
3M Tonawanda	Title V not found or expired.	9
A. Schonbeck & Company	Title V not found or expired.	5
ALCOA	Title V not found or expired.	6
Alstom Power – Air Preheater Company	New RACT limits exist.	9
C.R. Bard	Current permit includes various coating operations that don't appear to include the 2006 processes.	5
COGEN Corp.	Title V not found or expired.	2
Coney Island, North River, Owl's head, Tallman Island WWTPs	Title V not found or expired.	2
Dominion Transmission – Borger Station	Title V not found or expired.	8
Dupont Yerkes Plant	Emission unit 0-00010 not part of today's RACT.	9
Gershow Recycling	Title V not found or expired.	1
GM Powertrain	Title V not found or expired.	6
Momentive Performance	Facility sold/Renamed.	5
Parker Hannifin	Title V not found or expired.	7
Prestolite Electric	Title V not found or expired.	9
Revere Smelting & Refining Corp.	Title V not found or expired.	3
Tenneco Gas #229	Title V not found or expired.	9
Tennessee Gas Pipeline Compressor Station #245	Shutdown of the ML-15 engine and lower emission rates.	6
Tennessee Gas Pipeline Compressor Station #254	Title V not found or expired.	4
Titan X/Valeo Engine cooling	Facility opted to cap VOC emissions in 2005.	9
Village of Freeport Plant #1	Permit includes Nox limits for engines 10, 11 and 12 but not #9.	1
Von Roll USA	New RACT limits exist.	4

Eliminating the backlog of SIP revisions is a national and regional priority for EPA. Region 2 has established procedures to ensure future SIPs are acted on within statutory requirements. Such procedures will have the co-benefit of providing more certainty and more efficiency with the RACT and Title V permit process. My staff is available to discuss these RACT SIPs and the three tables above in more detail should you have any questions with the information provided. Processing these backlogged RACT SIPs are a priority for our office and I would like to thank you and your staff for your assistance in assessing these SIPs and for providing the necessary supplemental information that we are requesting. Please feel free to contact me at (212) 637-3736 or Richard Ruvo, Chief, Air

Programs Branch at (212) 637-4014 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Filippelli". The signature is written in a cursive style with a horizontal line extending to the left.

John Filippelli,
Director, Air & Radiation Division

cc: Mike Sheehan, NYSDEC