



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-4144-00085/00001
Effective Date: 02/04/2016 Expiration Date: 02/03/2026

Permit Issued To: Hexion Inc
64 Farnarn Road
South Glens Falls, NY 12803

Contact: RENE CHAMPAGNE
MOMENTIVE SPECIALTY CHEMICALS INC
64 FARNAN RD
SOUTH GLENS FALLS, NY 12803
(518) 792-8040

Facility: HEXION INC
64 FARNAN RD
SOUTH GLENS FALLS, NY 12803

Description:
Hexion Inc. develops, manufactures and markets liquid thermosetting adhesives and formaldehyde solutions.

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: KEVIN R BLISS
NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 5 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 5 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 5 Headquarters
Division of Environmental Permits
Route 86, PO Box 296
Ray Brook, NY 12977-0296
(518) 897-1234

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To:Hexion Inc
64 Farnarn Road
South Glens Falls, NY 12803

Facility: HEXION INC
64 FARNAN RD
SOUTH GLENS FALLS, NY 12803

Authorized Activity By Standard Industrial Classification Code:
2869 - INDUSTRIAL ORGANIC CHEMICALS,NEC

Permit Effective Date: 02/04/2016

Permit Expiration Date: 02/03/2026



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=A-00001,Proc=001

- 2 40CFR 60.482-1(d), NSPS Subpart VV: Equipment exemption.
- 3 40CFR 60.482-2(a), NSPS Subpart VV: Standards for light liquid service pumps
- 4 40CFR 60.482-2(c), NSPS Subpart VV: Leak detection.
- 5 40CFR 60.482-2(d), NSPS Subpart VV: Exemption.
- 6 40CFR 60.482-2(e), NSPS Subpart VV: Exemption.
- 7 40CFR 60.482-3(a), NSPS Subpart VV: Standards for compressors.
- 8 40CFR 60.482-3(b), NSPS Subpart VV: Standards for compressors.
- 9 40CFR 60.482-3(c), NSPS Subpart VV: Standards for compressors.
- 10 40CFR 60.482-3(d), NSPS Subpart VV: Standards for compressors.
- 11 40CFR 60.482-3(e), NSPS Subpart VV: Standards for compressors.
- 12 40CFR 60.482-3(g), NSPS Subpart VV: Standards for compressors.
- 13 40CFR 60.482-3(i), NSPS Subpart VV: Exemption.
- 14 40CFR 60.482-4(a), NSPS Subpart VV: Standards for pressure relief devices.
- 15 40CFR 60.482-4(b), NSPS Subpart VV: Leak detection.
- 16 40CFR 60.482-5(c), NSPS Subpart VV: Exemption.
- 17 40CFR 60.482-6(a), NSPS Subpart VV: Standards for open-ended valves or lines.
- 18 40CFR 60.482-6(b), NSPS Subpart VV: Standards for open-ended valves or lines.
- 19 40CFR 60.482-6(c), NSPS Subpart VV: Standards for open-ended valves or lines.
- 20 40CFR 60.482-7(a), NSPS Subpart VV: Standards for valves in gas/vapor service.
- 21 40CFR 60.482-7(c), NSPS Subpart VV: Leak detection - monitoring.
- 22 40CFR 60.482-7(d), NSPS Subpart VV: Leak detection - repair.
- 23 40CFR 60.482-7(f), NSPS Subpart VV: Exemption.
- 24 40CFR 60.482-7(g), NSPS Subpart VV: Exemption.
- 25 40CFR 60.482-7(h), NSPS Subpart VV: Exemption.
- 26 40CFR 60.482-8(a), NSPS Subpart VV: Monitoring requirements.
- 27 40CFR 60.482-8(c), NSPS Subpart VV: Leak detection - repair.
- 28 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 29 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 30 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 31 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 32 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 33 40CFR 60.483-1(a), NSPS Subpart VV: Alternative standards for valves.
- 34 40CFR 60.483-1(d), NSPS Subpart VV: Alternative standards for valves.
- 35 40CFR 60.483-2(b)(2), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 36 40CFR 60.483-2(b)(3), NSPS Subpart VV: Alternative standards for



- valves - ship period leak detection and repair.
- 37 40CFR 60.483-2(b)(6), NSPS Subpart VV: Leak detection period monitoring.
- 38 40CFR 60.486, NSPS Subpart VV: Recordkeeping.
- 39 40CFR 60.487, NSPS Subpart VV: Reporting.

EU=A-00001,Proc=002

- 40 40CFR 60.482-1(d), NSPS Subpart VV: Equipment exemption.
- 41 40CFR 60.482-2(a), NSPS Subpart VV: Standards for light liquid service pumps
- 42 40CFR 60.482-2(c), NSPS Subpart VV: Leak detection.
- 43 40CFR 60.482-2(d), NSPS Subpart VV: Exemption.
- 44 40CFR 60.482-2(e), NSPS Subpart VV: Exemption.
- 45 40CFR 60.482-3(a), NSPS Subpart VV: Standards for compressors.
- 46 40CFR 60.482-3(b), NSPS Subpart VV: Standards for compressors.
- 47 40CFR 60.482-3(c), NSPS Subpart VV: Standards for compressors.
- 48 40CFR 60.482-3(d), NSPS Subpart VV: Standards for compressors.
- 49 40CFR 60.482-3(e), NSPS Subpart VV: Standards for compressors.
- 50 40CFR 60.482-3(g), NSPS Subpart VV: Standards for compressors.
- 51 40CFR 60.482-3(i), NSPS Subpart VV: Exemption.
- 52 40CFR 60.482-4(a), NSPS Subpart VV: Standards for pressure relief devices.
- 53 40CFR 60.482-4(b), NSPS Subpart VV: Leak detection.
- 54 40CFR 60.482-5(c), NSPS Subpart VV: Exemption.
- 55 40CFR 60.482-6(a), NSPS Subpart VV: Standards for open-ended valves or lines.
- 56 40CFR 60.482-6(b), NSPS Subpart VV: Standards for open-ended valves or lines.
- 57 40CFR 60.482-6(c), NSPS Subpart VV: Standards for open-ended valves or lines.
- 58 40CFR 60.482-7(a), NSPS Subpart VV: Standards for valves in gas/vapor service.
- 59 40CFR 60.482-7(c), NSPS Subpart VV: Leak detection - monitoring.
- 60 40CFR 60.482-7(d), NSPS Subpart VV: Leak detection - repair.
- 61 40CFR 60.482-7(f), NSPS Subpart VV: Exemption.
- 62 40CFR 60.482-7(g), NSPS Subpart VV: Exemption.
- 63 40CFR 60.482-7(h), NSPS Subpart VV: Exemption.
- 64 40CFR 60.482-8(a), NSPS Subpart VV: Monitoring requirements.
- 65 40CFR 60.482-8(c), NSPS Subpart VV: Leak detection - repair.
- 66 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 67 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 68 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 69 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 70 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 71 40CFR 60.483-1(a), NSPS Subpart VV: Alternative standards for valves.
- 72 40CFR 60.483-1(d), NSPS Subpart VV: Alternative standards for valves.
- 73 40CFR 60.483-2(b)(2), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 74 40CFR 60.483-2(b)(3), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 75 40CFR 60.483-2(b)(6), NSPS Subpart VV: Leak detection period monitoring.
- 76 40CFR 60.486, NSPS Subpart VV: Recordkeeping.
- 77 40CFR 60.487, NSPS Subpart VV: Reporting.



EU=A-00001,Proc=006

- 78 40CFR 60.116b(a), NSPS Subpart Kb: Monitoring of operations.
- 79 40CFR 60.482-1(d), NSPS Subpart VV: Equipment exemption.
- 80 40CFR 60.482-2(a), NSPS Subpart VV: Standards for light liquid service pumps
- 81 40CFR 60.482-2(c), NSPS Subpart VV: Leak detection.
- 82 40CFR 60.482-2(d), NSPS Subpart VV: Exemption.
- 83 40CFR 60.482-2(e), NSPS Subpart VV: Exemption.
- 84 40CFR 60.482-3(a), NSPS Subpart VV: Standards for compressors.
- 85 40CFR 60.482-3(b), NSPS Subpart VV: Standards for compressors.
- 86 40CFR 60.482-3(c), NSPS Subpart VV: Standards for compressors.
- 87 40CFR 60.482-3(d), NSPS Subpart VV: Standards for compressors.
- 88 40CFR 60.482-3(e), NSPS Subpart VV: Standards for compressors.
- 89 40CFR 60.482-3(g), NSPS Subpart VV: Standards for compressors.
- 90 40CFR 60.482-3(i), NSPS Subpart VV: Exemption.
- 91 40CFR 60.482-4(a), NSPS Subpart VV: Standards for pressure relief devices.
- 92 40CFR 60.482-4(b), NSPS Subpart VV: Leak detection.
- 93 40CFR 60.482-5(c), NSPS Subpart VV: Exemption.
- 94 40CFR 60.482-6(a), NSPS Subpart VV: Standards for open-ended valves or lines.
- 95 40CFR 60.482-6(b), NSPS Subpart VV: Standards for open-ended valves or lines.
- 96 40CFR 60.482-6(c), NSPS Subpart VV: Standards for open-ended valves or lines.
- 97 40CFR 60.482-7(a), NSPS Subpart VV: Standards for valves in gas/vapor service.
- 98 40CFR 60.482-7(c), NSPS Subpart VV: Leak detection - monitoring.
- 99 40CFR 60.482-7(d), NSPS Subpart VV: Leak detection - repair.
- 100 40CFR 60.482-7(f), NSPS Subpart VV: Exemption.
- 101 40CFR 60.482-7(g), NSPS Subpart VV: Exemption.
- 102 40CFR 60.482-7(h), NSPS Subpart VV: Exemption.
- 103 40CFR 60.482-8(a), NSPS Subpart VV: Monitoring requirements.
- 104 40CFR 60.482-8(c), NSPS Subpart VV: Leak detection - repair.
- 105 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 106 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 107 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 108 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 109 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 110 40CFR 60.483-1(a), NSPS Subpart VV: Alternative standards for valves.
- 111 40CFR 60.483-1(d), NSPS Subpart VV: Alternative standards for valves.
- 112 40CFR 60.483-2(b)(2), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 113 40CFR 60.483-2(b)(3), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 114 40CFR 60.483-2(b)(6), NSPS Subpart VV: Leak detection period monitoring.
- 115 40CFR 60.486, NSPS Subpart VV: Recordkeeping.
- 116 40CFR 60.487, NSPS Subpart VV: Reporting.

EU=A-00001,Proc=007

- 117 40CFR 60.116b(a), NSPS Subpart Kb: Monitoring of operations.



EU=A-00001,EP=00001

- 118 6 NYCRR 212.6 (a): Compliance Demonstration
- 119 40CFR 60.612(a), NSPS Subpart III: Compliance Demonstration
- 120 40CFR 60.612(a), NSPS Subpart III: Compliance Demonstration

EU=A-00001,EP=00002

- 121 6 NYCRR 212.6 (a): Compliance Demonstration
- 122 40CFR 60.612(a), NSPS Subpart III: Compliance Demonstration
- 123 40CFR 60.612(a), NSPS Subpart III: Compliance Demonstration

EU=A-00002,Proc=004

- 124 40CFR 60.116b(b), NSPS Subpart Kb: Compliance Demonstration
- 125 40CFR 60.482-1(d), NSPS Subpart VV: Equipment exemption.
- 126 40CFR 60.482-2(a), NSPS Subpart VV: Standards for light liquid service pumps
- 127 40CFR 60.482-2(c), NSPS Subpart VV: Leak detection.
- 128 40CFR 60.482-2(d), NSPS Subpart VV: Exemption.
- 129 40CFR 60.482-2(e), NSPS Subpart VV: Exemption.
- 130 40CFR 60.482-3(a), NSPS Subpart VV: Standards for compressors.
- 131 40CFR 60.482-3(b), NSPS Subpart VV: Standards for compressors.
- 132 40CFR 60.482-3(c), NSPS Subpart VV: Standards for compressors.
- 133 40CFR 60.482-3(d), NSPS Subpart VV: Standards for compressors.
- 134 40CFR 60.482-3(e), NSPS Subpart VV: Standards for compressors.
- 135 40CFR 60.482-3(g), NSPS Subpart VV: Standards for compressors.
- 136 40CFR 60.482-3(i), NSPS Subpart VV: Exemption.
- 137 40CFR 60.482-4(a), NSPS Subpart VV: Standards for pressure relief devices.
- 138 40CFR 60.482-4(b), NSPS Subpart VV: Leak detection.
- 139 40CFR 60.482-5(c), NSPS Subpart VV: Exemption.
- 140 40CFR 60.482-6(a), NSPS Subpart VV: Standards for open-ended valves or lines.
- 141 40CFR 60.482-6(b), NSPS Subpart VV: Standards for open-ended valves or lines.
- 142 40CFR 60.482-6(c), NSPS Subpart VV: Standards for open-ended valves or lines.
- 143 40CFR 60.482-7(a), NSPS Subpart VV: Standards for valves in gas/vapor service.
- 144 40CFR 60.482-7(c), NSPS Subpart VV: Leak detection - monitoring.
- 145 40CFR 60.482-7(d), NSPS Subpart VV: Leak detection - repair.
- 146 40CFR 60.482-7(f), NSPS Subpart VV: Exemption.
- 147 40CFR 60.482-7(g), NSPS Subpart VV: Exemption.
- 148 40CFR 60.482-7(h), NSPS Subpart VV: Exemption.
- 149 40CFR 60.482-8(a), NSPS Subpart VV: Monitoring requirements.
- 150 40CFR 60.482-8(c), NSPS Subpart VV: Leak detection - repair.
- 151 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 152 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 153 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 154 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.
- 155 40CFR 60.482-9, NSPS Subpart VV: Allowable repair delays.



- 156 40CFR 60.483-1(a), NSPS Subpart VV: Alternative standards for valves.
- 157 40CFR 60.483-1(d), NSPS Subpart VV: Alternative standards for valves.
- 158 40CFR 60.483-2(b)(2), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 159 40CFR 60.483-2(b)(3), NSPS Subpart VV: Alternative standards for valves - ship period leak detection and repair.
- 160 40CFR 60.483-2(b)(6), NSPS Subpart VV: Leak detection period monitoring.
- 161 40CFR 60.486, NSPS Subpart VV: Recordkeeping.
- 162 40CFR 60.487, NSPS Subpart VV: Reporting.

EU=A-00002,EP=00003

- 163 6 NYCRR 212.6 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 164 ECL 19-0301: Contaminant List
- 165 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 166 6 NYCRR Subpart 201-5: Emission Unit Definition
- 167 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 168 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 169 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 170 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 171 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6 NYCRR 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;
- (3) During the period of the emergency the facility owner and/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 and/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 and/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 F: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item J: Required Emission Tests - 6 NYCRR 202-1.1



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: Open Fires Prohibitions - 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.

Item L: 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 M: 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Air pollution prohibited



Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:6 NYCRR 211.1

Item 1.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**** Emission Unit Level ****

Condition 2: Equipment exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-1(d), NSPS Subpart VV

Item 2.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 2.2:

Equipment that is in a vacuum service is excluded from the requirements of section 40 CFR 60-VV.482 if it is identified as required in paragraph 40 CFR 60-VV.482(e)(5).

Condition 3: Standards for light liquid service pumps

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(a), NSPS Subpart VV

Item 3.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 3.2:

Each pump in light liquid service shall:

- 1) be monitored monthly, in accordance with the methods in Subpart 40 CFR 60-VV, and
- 2) be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 4: Leak detection.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(c), NSPS Subpart VV

Item 4.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 4.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

Condition 5: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(d), NSPS Subpart VV

Item 5.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 5.2:

Pumps equipped with a dual mechanical seal system that includes a barrier fluid system is exempt if the conditions in subparagraphs 40 CFR 60-VV.482-2(d)(1 - 6) are satisfied.

Condition 6: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(e), NSPS Subpart VV

Item 6.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 6.2:

Pumps which have no externally actuated shaft penetrating the pump housing, have no detectable emissions greater than 500 ppm above the background readings, and are tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, are exempt from the requirements of subdivision 40 CFR 60-VV.482-2.

Condition 7: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(a), NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 7.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 7.2:

Each compressor shall be equipped with a seal system that includes a barrier fluid system and which prevents leakage of VOCs to the atmosphere.

**Condition 8: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(b), NSPS Subpart VV

Item 8.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 8.2:

Each compressor seal system shall be equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

**Condition 9: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(c), NSPS Subpart VV

Item 9.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 9.2:

The barrier fluid system shall be in heavy fluid service or shall not be in VOC service.

**Condition 10: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(d), NSPS Subpart VV

Item 10.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 10.2:

Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system and/or the barrier fluid system.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 11: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(e), NSPS Subpart VV

Item 11.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 11.2:

Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system and/or the barrier fluid system.

Condition 12: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(g), NSPS Subpart VV

Item 12.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 12.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 13: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(i), NSPS Subpart VV

Item 13.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 13.2:

Any compressor that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, and is tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, is exempt from the requirements of subdivision 40 CFR 60-VV.482-3.

Condition 14: Standards for pressure relief devices.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(a), NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 14.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 14.2:

Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background.

Condition 15: Leak detection.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(b), NSPS Subpart VV

Item 15.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 15.2:

After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as indicated by instrument and monitor readings or 500 ppm or less above background no later than 5 calendar days after the pressure release.

Condition 16: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-5(c), NSPS Subpart VV

Item 16.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 16.2:

In-situ sampling systems are exempt from the requirements of subdivision 40 CFR 60-VV.482-5.

Condition 17: Standards for open-ended valves or lines.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(a), NSPS Subpart VV

Item 17.1:

This Condition applies to Emission Unit: A-00001
Process: 001



Item 17.2:

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve.

Condition 18: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(b), NSPS Subpart VV

Item 18.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 18.2:

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

Condition 19: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(c), NSPS Subpart VV

Item 19.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 19.2:

When a double block-and-bleed system is being used, the bleed valve or line may remain open **only** during operations that require venting the line between the block valves.

Condition 20: Standards for valves in gas/vapor service.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(a), NSPS Subpart VV

Item 20.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 20.2:

Each valve shall be monitored monthly to detect leaks.

Condition 21: Leak detection - monitoring.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(c), NSPS Subpart VV



Item 21.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 21.2:

Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, until a leak is detected. When a leak is detected the valve shall be monitored monthly until a leak is not detected for 2 consecutive months.

Condition 22: Leak detection - repair.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(d), NSPS Subpart VV

Item 22.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 22.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 23: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(f), NSPS Subpart VV

Item 23.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 23.2:

Any valve that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, is exempt from the requirements of paragraph 40 CFR 60- VV.482-7(a) if the valve:

- 1) has no external actuating mechanism in contact with the process fluid, and
- 2) is tested for compliance initially, annually, and at other times as requested by the Administrator.

Condition 24: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026



Applicable Federal Requirement:40CFR 60.482-7(g), NSPS Subpart VV

Item 24.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 24.2:

Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of compliance, and
- 2) the owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor periods.

Condition 25: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(h), NSPS Subpart VV

Item 25.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 25.2:

Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface,
- 2) the process unit within which the valve is located either becomes an affected facility or the owner or operator designates less than 3.0 percent of the valves in the facility as difficult-to-monitor, and
- 3) the owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

Condition 26: Monitoring requirements.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(a), NSPS Subpart VV

Item 26.1:

This Condition applies to Emission Unit: A-00001

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Process: 001

Item 26.2:

Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.

Condition 27: Leak detection - repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(c), NSPS Subpart VV

Item 27.1:

This Condition applies to Emission Unit: A-00001

Process: 001

Item 27.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 28: Allowable repair delays.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 28.1:

This Condition applies to Emission Unit: A-00001

Process: 001

Item 28.2:

Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

Condition 29: Allowable repair delays.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 29.1:

This Condition applies to Emission Unit: A-00001

Process: 001

Item 29.2:

Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve



assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

Condition 30: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 30.1:
This Condition applies to Emission Unit: A-00001
Process: 001

Item 30.2:
Delay of repair for pumps will be allowed if:

- 1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
- 2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

Condition 31: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 31.1:
This Condition applies to Emission Unit: A-00001
Process: 001

Item 31.2:
Delay of repair for valves will be allowed if:

- 1) the owner or operator demonstrates that the emissions of purged materials resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
- 2) when repair procedures are effected, the purged material is collected and destroyed in a control device.

Condition 32: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026



Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 32.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 32.2:

Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

**Condition 33: Alternative standards for valves.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.483-1(a), NSPS Subpart VV

Item 33.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 33.2:

An owner or operator may comply with an allowable percentage of valve leaking of equal to or less than 2.0 percent.

**Condition 34: Alternative standards for valves.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.483-1(d), NSPS Subpart VV

Item 34.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 34.2:

Owners and operators utilizing alternative percentage standards for compliance shall not have an affected facility with a leak percentage greater than 2.0 percent.

**Condition 35: Alternative standards for valves - ship period leak
detection and repair.
Effective between the dates of 02/04/2016 and 02/03/2026**

**Applicable Federal Requirement:40CFR 60.483-2(b)(2), NSPS Subpart
VV**

Item 35.1:

This Condition applies to Emission Unit: A-00001
Process: 001

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 35.2:

When 2 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip one quarterly leak detection period.

Condition 36: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(3), NSPS Subpart

VV

Item 36.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 36.2:

When 5 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip three quarterly leak detection periods.

Condition 37: Leak detection period monitoring.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(6), NSPS Subpart

VV

Item 37.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 37.2:

An owner or operator shall maintain a record of the percent of valves found leaking during each leak detection period.

Condition 38: Recordkeeping.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.486, NSPS Subpart VV

Item 38.1:

This Condition applies to Emission Unit: A-00001
Process: 001

Item 38.2:



Any owner or operator shall comply with all applicable recordkeeping requirements located in section 40 CFR 60-VV.486.

Condition 39: Reporting.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.487, NSPS Subpart VV

Item 39.1:
This Condition applies to Emission Unit: A-00001
Process: 001

Item 39.2:
Any owner or operator shall submit a semiannual report to the Administrator, commencing 6 months after the initial startup date. These reports shall include all information required in section 40 CFR 60-VV.487.

Condition 40: Equipment exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-1(d), NSPS Subpart VV

Item 40.1:
This Condition applies to Emission Unit: A-00001
Process: 002

Item 40.2:
Equipment that is in a vacuum service is excluded from the requirements of section 40 CFR 60-VV.482 if it is identified as required in paragraph 40 CFR 60-VV.482(e)(5).

Condition 41: Standards for light liquid service pumps
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(a), NSPS Subpart VV

Item 41.1:
This Condition applies to Emission Unit: A-00001
Process: 002

Item 41.2:
Each pump in light liquid service shall:

- 1) be monitored monthly, in accordance with the methods in Subpart 40 CFR 60-VV, and
- 2) be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 42: Leak detection.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(c), NSPS Subpart VV

Item 42.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 42.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

Condition 43: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(d), NSPS Subpart VV

Item 43.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 43.2:

Pumps equipped with a dual mechanical seal system that includes a barrier fluid system is exempt if the conditions in subparagraphs 40 CFR 60-VV.482-2(d)(1 - 6) are satisfied.

Condition 44: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(e), NSPS Subpart VV

Item 44.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 44.2:

Pumps which have no externally actuated shaft penetrating the pump housing, have no detectable emissions greater than 500 ppm above the background readings, and are tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, are exempt from the requirements of subdivision 40 CFR 60-VV.482-2.

Condition 45: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026



Applicable Federal Requirement:40CFR 60.482-3(a), NSPS Subpart VV

Item 45.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 45.2:

Each compressor shall be equipped with a seal system that includes a barrier fluid system and which prevents leakage of VOCs to the atmosphere.

**Condition 46: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(b), NSPS Subpart VV

Item 46.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 46.2:

Each compressor seal system shall be equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

**Condition 47: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(c), NSPS Subpart VV

Item 47.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 47.2:

The barrier fluid system shall be in heavy fluid service or shall not be in VOC service.

**Condition 48: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable Federal Requirement:40CFR 60.482-3(d), NSPS Subpart VV

Item 48.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 48.2:

Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal



system and/or the barrier fluid system.

Condition 49: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(e), NSPS Subpart VV

Item 49.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 49.2:

Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system and/or the barrier fluid system.

Condition 50: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(g), NSPS Subpart VV

Item 50.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 50.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 51: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(i), NSPS Subpart VV

Item 51.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 51.2:

Any compressor that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, and is tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, is exempt from the requirements of subdivision 40 CFR 60-VV.482-3.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 52: Standards for pressure relief devices.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(a), NSPS Subpart VV

Item 52.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 52.2:

Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background.

Condition 53: Leak detection.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(b), NSPS Subpart VV

Item 53.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 53.2:

After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as indicated by instrument and monitor readings or 500 ppm or less above background no later than 5 calendar days after the pressure release.

Condition 54: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-5(c), NSPS Subpart VV

Item 54.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 54.2:

In-situ sampling systems are exempt from the requirements of subdivision 40 CFR 60-VV.482-5.

Condition 55: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(a), NSPS Subpart VV

Item 55.1:

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



This Condition applies to Emission Unit: A-00001
Process: 002

Item 55.2:

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve.

Condition 56: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(b), NSPS Subpart VV

Item 56.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 56.2:

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

Condition 57: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(c), NSPS Subpart VV

Item 57.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 57.2:

When a double block-and-bleed system is being used, the bleed valve or line may remain open **only** during operations that require venting the line between the block valves.

Condition 58: Standards for valves in gas/vapor service.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(a), NSPS Subpart VV

Item 58.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 58.2:

Each valve shall be monitored monthly to detect leaks.

Condition 59: Leak detection - monitoring.



Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(c), NSPS Subpart VV

Item 59.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 59.2:

Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, until a leak is detected. When a leak is detected the valve shall be monitored monthly until a leak is not detected for 2 consecutive months.

Condition 60: Leak detection - repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(d), NSPS Subpart VV

Item 60.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 60.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 61: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(f), NSPS Subpart VV

Item 61.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 61.2:

Any valve that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, is exempt from the requirements of paragraph 40 CFR 60- VV.482-7(a) if the valve:

- 1) has no external actuating mechanism in contact with the process fluid, and
- 2) is tested for compliance initially, annually, and at other times as requested by the Administrator.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 62: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(g), NSPS Subpart VV

Item 62.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 62.2:

Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of compliance, and
- 2) the owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor periods.

Condition 63: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(h), NSPS Subpart VV

Item 63.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 63.2:

Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface,
- 2) the process unit within which the valve is located either becomes an affected facility or the owner or operator designates less than 3.0 percent of the valves in the facility as difficult-to-monitor, and
- 3) the owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

Condition 64: Monitoring requirements.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(a), NSPS Subpart VV



Item 64.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 64.2:

Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.

Condition 65: Leak detection - repair.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(c), NSPS Subpart VV

Item 65.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 65.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 66: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 66.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 66.2:

Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

Condition 67: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 67.1:

This Condition applies to Emission Unit: A-00001
Process: 002

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 67.2:

Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

Condition 68: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 68.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 68.2:

Delay of repair for valves will be allowed if:

- 1) the owner or operator demonstrates that the emissions of purged materials resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
- 2) when repair procedures are effected, the purged material is collected and destroyed in a control device.

Condition 69: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 69.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 69.2:

Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

Condition 70: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 70.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 70.2:

Delay of repair for pumps will be allowed if:

- 1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
- 2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

Condition 71: Alternative standards for valves.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(a), NSPS Subpart VV

Item 71.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 71.2:

An owner or operator may comply with an allowable percentage of valve leaking of equal to or less than 2.0 percent.

Condition 72: Alternative standards for valves.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(d), NSPS Subpart VV

Item 72.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 72.2:

Owners and operators utilizing alternative percentage standards for compliance shall not have an affected facility with a leak percentage greater than 2.0 percent.

Condition 73: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(2), NSPS Subpart

VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 73.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 73.2:

When 2 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip one quarterly leak detection period.

Condition 74: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(3), NSPS Subpart

VV

Item 74.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 74.2:

When 5 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip three quarterly leak detection periods.

Condition 75: Leak detection period monitoring.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(6), NSPS Subpart

VV

Item 75.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 75.2:

An owner or operator shall maintain a record of the percent of valves found leaking during each leak detection period.

Condition 76: Recordkeeping.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.486, NSPS Subpart VV

Item 76.1:

This Condition applies to Emission Unit: A-00001
Process: 002

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 76.2:

Any owner or operator shall comply with all applicable recordkeeping requirements located in section 40 CFR 60-VV.486.

Condition 77: Reporting.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.487, NSPS Subpart VV

Item 77.1:

This Condition applies to Emission Unit: A-00001
Process: 002

Item 77.2:

Any owner or operator shall submit a semiannual report to the Administrator, commencing 6 months after the initial startup date. These reports shall include all information required in section 40 CFR 60-VV.487.

Condition 78: Monitoring of operations.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.116b(a), NSPS Subpart Kb

Item 78.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 78.2:

The owner or operator shall maintain records of materials stored, time stored, and the maximum vapor pressure during the storage period; for a minimum of 2 years.

Condition 79: Equipment exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-1(d), NSPS Subpart VV

Item 79.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 79.2:

Equipment that is in a vacuum service is excluded from the requirements of section 40 CFR 60-VV.482 if it is identified as required in paragraph 40 CFR 60-VV.482(e)(5).

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 80: Standards for light liquid service pumps
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(a), NSPS Subpart VV

Item 80.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 80.2:

Each pump in light liquid service shall:

- 1) be monitored monthly, in accordance with the methods in Subpart 40 CFR 60-VV, and
- 2) be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal.

Condition 81: Leak detection.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(c), NSPS Subpart VV

Item 81.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 81.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

Condition 82: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(d), NSPS Subpart VV

Item 82.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 82.2:

Pumps equipped with a dual mechanical seal system that includes a barrier fluid system is exempt if the conditions in subparagraphs 40 CFR 60-VV.482-2(d)(1 - 6) are satisfied.

Condition 83: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026



Applicable Federal Requirement:40CFR 60.482-2(e), NSPS Subpart VV

Item 83.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 83.2:

Pumps which have no externally actuated shaft penetrating the pump housing, have no detectable emissions greater than 500 ppm above the background readings, and are tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, are exempt from the requirements of subdivision 40 CFR 60-VV.482-2.

Condition 84: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(a), NSPS Subpart VV

Item 84.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 84.2:

Each compressor shall be equipped with a seal system that includes a barrier fluid system and which prevents leakage of VOCs to the atmosphere.

Condition 85: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(b), NSPS Subpart VV

Item 85.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 85.2:

Each compressor seal system shall be equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

Condition 86: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(c), NSPS Subpart VV

Item 86.1:

This Condition applies to Emission Unit: A-00001
Process: 006



Item 86.2:

The barrier fluid system shall be in heavy fluid service or shall not be in VOC service.

Condition 87: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(d), NSPS Subpart VV

Item 87.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 87.2:

Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal system and/or the barrier fluid system.

Condition 88: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(e), NSPS Subpart VV

Item 88.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 88.2:

Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system and/or the barrier fluid system.

Condition 89: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(g), NSPS Subpart VV

Item 89.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 89.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 90: Exemption.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(i), NSPS Subpart VV

Item 90.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 90.2:

Any compressor that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, and is tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, is exempt from the requirements of subdivision 40 CFR 60-VV.482-3.

Condition 91: Standards for pressure relief devices.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(a), NSPS Subpart VV

Item 91.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 91.2:

Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background.

Condition 92: Leak detection.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(b), NSPS Subpart VV

Item 92.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 92.2:

After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as indicated by instrument and monitor readings or 500 ppm or less above background no later than 5 calendar days after the pressure release.

Condition 93: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-5(c), NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 93.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 93.2:

In-situ sampling systems are exempt from the requirements of subdivision 40 CFR 60-VV.482-5.

Condition 94: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(a), NSPS Subpart VV

Item 94.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 94.2:

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve.

Condition 95: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(b), NSPS Subpart VV

Item 95.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 95.2:

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

Condition 96: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(c), NSPS Subpart VV

Item 96.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 96.2:

When a double block-and-bleed system is being used, the bleed valve or line may remain open **only** during operations that require venting the line between the block valves.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 97: Standards for valves in gas/vapor service.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(a), NSPS Subpart VV

Item 97.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 97.2:

Each valve shall be monitored monthly to detect leaks.

Condition 98: Leak detection - monitoring.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(c), NSPS Subpart VV

Item 98.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 98.2:

Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, until a leak is detected. When a leak is detected the valve shall be monitored monthly until a leak is not detected for 2 consecutive months.

Condition 99: Leak detection - repair.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(d), NSPS Subpart VV

Item 99.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 99.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 100: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(f), NSPS Subpart VV

Item 100.1:

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



This Condition applies to Emission Unit: A-00001
Process: 006

Item 100.2:

Any valve that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, is exempt from the requirements of paragraph 40 CFR 60- VV.482-7(a) if the valve:

- 1) has no external actuating mechanism in contact with the process fluid, and
- 2) is tested for compliance initially, annually, and at other times as requested by the Administrator.

Condition 101: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(g), NSPS Subpart VV

Item 101.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 101.2:

Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of compliance, and
- 2) the owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor periods.

Condition 102: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(h), NSPS Subpart VV

Item 102.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 102.2:

Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve cannot be monitored

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



without elevating the monitoring personnel more than 2 meters above a support surface,

2) the process unit within which the valve is located either becomes an affected facility or the owner or operator designates less than 3.0 percent of the valves in the facility as difficult-to-monitor, and

3) the owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

Condition 103: Monitoring requirements.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(a), NSPS Subpart VV

Item 103.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 103.2:

Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.

Condition 104: Leak detection - repair.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(c), NSPS Subpart VV

Item 104.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 104.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 105: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 105.1:

This Condition applies to Emission Unit: A-00001
Process: 006

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 105.2:

Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

Condition 106: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 106.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 106.2:

Delay of repair for valves will be allowed if:

- 1) the owner or operator demonstrates that the emissions of purged materials resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
- 2) when repair procedures are effected, the purged material is collected and destroyed in a control device.

Condition 107: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 107.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 107.2:

Delay of repair for pumps will be allowed if:

- 1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
- 2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

Condition 108: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 108.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 108.2:

Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

Condition 109: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 109.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 109.2:

Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

Condition 110: Alternative standards for valves.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(a), NSPS Subpart VV

Item 110.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 110.2:

An owner or operator may comply with an allowable percentage of valve leaking of equal to or less than 2.0 percent.

Condition 111: Alternative standards for valves.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(d), NSPS Subpart VV

Item 111.1:

This Condition applies to Emission Unit: A-00001

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Process: 006

Item 111.2:

Owners and operators utilizing alternative percentage standards for compliance shall not have an affected facility with a leak percentage greater than 2.0 percent.

Condition 112: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(2), NSPS Subpart

VV

Item 112.1:

This Condition applies to Emission Unit: A-00001

Process: 006

Item 112.2:

When 2 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip one quarterly leak detection period.

Condition 113: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(3), NSPS Subpart

VV

Item 113.1:

This Condition applies to Emission Unit: A-00001

Process: 006

Item 113.2:

When 5 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip three quarterly leak detection periods.

Condition 114: Leak detection period monitoring.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(6), NSPS Subpart

VV

Item 114.1:

This Condition applies to Emission Unit: A-00001

Process: 006

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 114.2:

An owner or operator shall maintain a record of the percent of valves found leaking during each leak detection period.

Condition 115: Recordkeeping.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.486, NSPS Subpart VV

Item 115.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 115.2:

Any owner or operator shall comply with all applicable recordkeeping requirements located in section 40 CFR 60-VV.486.

Condition 116: Reporting.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.487, NSPS Subpart VV

Item 116.1:

This Condition applies to Emission Unit: A-00001
Process: 006

Item 116.2:

Any owner or operator shall submit a semiannual report to the Administrator, commencing 6 months after the initial startup date. These reports shall include all information required in section 40 CFR 60-VV.487.

Condition 117: Monitoring of operations.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.116b(a), NSPS Subpart Kb

Item 117.1:

This Condition applies to Emission Unit: A-00001
Process: 007

Item 117.2:

The owner or operator shall maintain records of materials stored, time stored, and the maximum vapor pressure during the storage period; for a minimum of 2 years.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 118: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 118.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Emission Point: 00001

Item 118.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 119: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.612(a), NSPS Subpart III

Item 119.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 119.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility shall: reduce emissions of TOC (minus methane and ethane determined by the most recent

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



performance test) by 98 weight-percent, or to a TOC concentration of 20 ppmv or less (after subtracting 11.2 ppm methane determined during the performance test).

Testing is to be done by Sun Analyzer Model 1400 or equivalent method/device (Infrared Analyzer). Testing frequency is to be once every two (2) weeks with the possibility, upon approval by the Administrator, of extending this to once a month.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

Condition 120: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.612(a), NSPS Subpart III

Item 120.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001 Emission Point: 00001

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 120.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

A catalytic incinerator minimum temperature of 480 deg C (after the catalyst bed) was established from testing.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 480 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

Condition 121: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026



Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 121.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Emission Point: 00002

Item 121.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 122: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.612(a), NSPS Subpart III

Item 122.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 122.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

A catalytic incinerator minimum temperature of 480 deg C (after the catalyst bed) was established from testing.

Parameter Monitored: TEMPERATURE

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Lower Permit Limit: 480 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

Condition 123: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.612(a), NSPS Subpart III

Item 123.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00001

Emission Point: 00002

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 123.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This facility shall: reduce emissions of TOC (minus methane and ethane determined by the most recent performance test) by 98 weight-percent, or to a TOC concentration of 20 ppmv or less (after subtracting 11.2 ppm methane determined during the performance test).

Testing is to be done by Sun Analyzer Model 1400 or equivalent method/device (Infrared Analyzer). Testing frequency is to be once every two (2) weeks with the possibility, upon approval by the Administrator, of extending this to once a month.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 12 calendar month(s).

Condition 124: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.116b(b), NSPS Subpart Kb

Item 124.1:



The Compliance Demonstration activity will be performed for:

Emission Unit: A-00002
Process: 004

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 124.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept on site for the life of the storage vessel.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 125: Equipment exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-1(d), NSPS Subpart VV

Item 125.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 125.2:

Equipment that is in a vacuum service is excluded from the requirements of section 40 CFR 60-VV.482 if it is identified as required in paragraph 40 CFR 60-VV.482(e)(5).

Condition 126: Standards for light liquid service pumps

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(a), NSPS Subpart VV

Item 126.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 126.2:

Each pump in light liquid service shall:

- 1) be monitored monthly, in accordance with the methods in Subpart 40 CFR 60-VV, and
- 2) be checked by visual inspection each calendar week for indications of liquids dripping

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



from the pump seal.

Condition 127: Leak detection.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(c), NSPS Subpart VV

Item 127.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 127.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

Condition 128: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(d), NSPS Subpart VV

Item 128.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 128.2:

Pumps equipped with a dual mechanical seal system that includes a barrier fluid system is exempt if the conditions in subparagraphs 40 CFR 60-VV.482-2(d)(1 - 6) are satisfied.

Condition 129: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-2(e), NSPS Subpart VV

Item 129.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 129.2:

Pumps which have no externally actuated shaft penetrating the pump housing, have no detectable emissions greater than 500 ppm above the background readings, and are tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, are exempt from the requirements of subdivision 40 CFR 60-VV.482-2.

Condition 130: Standards for compressors.



Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(a), NSPS Subpart VV

Item 130.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 130.2:

Each compressor shall be equipped with a seal system that includes a barrier fluid system and which prevents leakage of VOCs to the atmosphere.

Condition 131: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(b), NSPS Subpart VV

Item 131.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 131.2:

Each compressor seal system shall be equipped with a system that purges the barrier fluid into a process stream with zero VOC emissions to the atmosphere.

Condition 132: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(c), NSPS Subpart VV

Item 132.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 132.2:

The barrier fluid system shall be in heavy fluid service or shall not be in VOC service.

Condition 133: Standards for compressors.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(d), NSPS Subpart VV

Item 133.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 133.2:

Each barrier fluid system shall be equipped with a sensor that will detect failure of the seal



system and/or the barrier fluid system.

Condition 134: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(e), NSPS Subpart VV

Item 134.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 134.2:

Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system and/or the barrier fluid system.

Condition 135: Standards for compressors.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(g), NSPS Subpart VV

Item 135.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 135.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 136: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-3(i), NSPS Subpart VV

Item 136.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 136.2:

Any compressor that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, and is tested for compliance initially upon designation, annually, and at other times as requested by the Administrator, is exempt from the requirements of subdivision 40 CFR 60-VV.482-3.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 137: Standards for pressure relief devices.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(a), NSPS Subpart VV

Item 137.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 137.2:

Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background.

Condition 138: Leak detection.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-4(b), NSPS Subpart VV

Item 138.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 138.2:

After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions as indicated by instrument and monitor readings or 500 ppm or less above background no later than 5 calendar days after the pressure release.

Condition 139: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-5(c), NSPS Subpart VV

Item 139.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 139.2:

In-situ sampling systems are exempt from the requirements of subdivision 40 CFR 60-VV.482-5.

Condition 140: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(a), NSPS Subpart VV

Item 140.1:

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



This Condition applies to Emission Unit: A-00002
Process: 004

Item 140.2:

Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or second valve. The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve.

Condition 141: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(b), NSPS Subpart VV

Item 141.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 141.2:

Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed.

Condition 142: Standards for open-ended valves or lines.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-6(c), NSPS Subpart VV

Item 142.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 142.2:

When a double block-and-bleed system is being used, the bleed valve or line may remain open **only** during operations that require venting the line between the block valves.

Condition 143: Standards for valves in gas/vapor service.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(a), NSPS Subpart VV

Item 143.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 143.2:

Each valve shall be monitored monthly to detect leaks.

Condition 144: Leak detection - monitoring.



Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(c), NSPS Subpart VV

Item 144.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 144.2:

Any valve for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, until a leak is detected. When a leak is detected the valve shall be monitored monthly until a leak is not detected for 2 consecutive months.

Condition 145: Leak detection - repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(d), NSPS Subpart VV

Item 145.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 145.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 146: Exemption.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(f), NSPS Subpart VV

Item 146.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 146.2:

Any valve that is designated for no detectable emissions, as indicated by an instrument reading of 500 ppm or less above background, is exempt from the requirements of paragraph 40 CFR 60- VV.482-7(a) if the valve:

- 1) has no external actuating mechanism in contact with the process fluid, and
- 2) is tested for compliance initially, annually, and at other times as requested by the Administrator.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 147: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(g), NSPS Subpart VV

Item 147.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 147.2:

Any valve that is designated as an unsafe-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of compliance, and
- 2) the owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor periods.

Condition 148: Exemption.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-7(h), NSPS Subpart VV

Item 148.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 148.2:

Any valve that is designated as a difficult-to-monitor valve is exempt from the requirements of paragraph 40 CFR 60-VV.482-7(a) if:

- 1) the owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface,
- 2) the process unit within which the valve is located either becomes an affected facility or the owner or operator designates less than 3.0 percent of the valves in the facility as difficult-to-monitor, and
- 3) the owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year.

Condition 149: Monitoring requirements.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(a), NSPS Subpart VV



Item 149.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 149.2:

Pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors shall be monitored within 5 days if evidence of a potential leak is found by visual, audible, olfactory, or any other detection method.

Condition 150: Leak detection - repair.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-8(c), NSPS Subpart VV

Item 150.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 150.2:

When a leak is detected it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected. A first attempt to repair shall be made no later than 5 calendar days after each leak is detected.

Condition 151: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 151.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 151.2:

Delay of repair of equipment will be allowed for equipment which is isolated from the process and which does not remain in VOC service.

Condition 152: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 152.1:

This Condition applies to Emission Unit: A-00002
Process: 004

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 152.2:

Delay of repair for valves will be allowed if:

- 1) the owner or operator demonstrates that the emissions of purged materials resulting from immediate repair are greater than the fugitive emissions likely to result from delay of repair, and
- 2) when repair procedures are effected, the purged material is collected and destroyed in a control device.

Condition 153: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 153.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 153.2:

Delay of repair for pumps will be allowed if:

- 1) repair requires the use of a dual mechanical seal system that includes a barrier fluid system, and
- 2) repair is completed as soon as practicable, but not later than 6 months after the leak was detected.

Condition 154: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

Item 154.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 154.2:

Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.

Condition 155: Allowable repair delays.
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.482-9, NSPS Subpart VV

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 155.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 155.2:

Delay of repair beyond a process unit shutdown will be allowed for a valve, if valve assembly replacement is necessary during the process unit shutdown, valve assembly supplies have been depleted, and valve assembly supplies had been sufficiently stocked before the supplies were depleted. Delay of repair beyond the next process unit shutdown will not be allowed unless the next process unit shutdown occurs sooner than 6 months after the first process unit shutdown.

Condition 156: Alternative standards for valves.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(a), NSPS Subpart VV

Item 156.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 156.2:

An owner or operator may comply with an allowable percentage of valve leaking of equal to or less than 2.0 percent.

Condition 157: Alternative standards for valves.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-1(d), NSPS Subpart VV

Item 157.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 157.2:

Owners and operators utilizing alternative percentage standards for compliance shall not have an affected facility with a leak percentage greater than 2.0 percent.

Condition 158: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(2), NSPS Subpart

VV

Item 158.1:

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



This Condition applies to Emission Unit: A-00002
Process: 004

Item 158.2:

When 2 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip one quarterly leak detection period.

Condition 159: Alternative standards for valves - ship period leak detection and repair.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(3), NSPS Subpart

VV

Item 159.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 159.2:

When 5 consecutive quarterly leak detection periods, for valves in gas/vapor and light liquid service, are reported as having 2.0 percent or less of the valves leaking, the owner or operator of the facility may skip three quarterly leak detection periods.

Condition 160: Leak detection period monitoring.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.483-2(b)(6), NSPS Subpart

VV

Item 160.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 160.2:

An owner or operator shall maintain a record of the percent of valves found leaking during each leak detection period.

Condition 161: Recordkeeping.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.486, NSPS Subpart VV

Item 161.1:

This Condition applies to Emission Unit: A-00002
Process: 004

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Item 161.2:

Any owner or operator shall comply with all applicable recordkeeping requirements located in section 40 CFR 60-VV.486.

Condition 162: Reporting.

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:40CFR 60.487, NSPS Subpart VV

Item 162.1:

This Condition applies to Emission Unit: A-00002
Process: 004

Item 162.2:

Any owner or operator shall submit a semiannual report to the Administrator, commencing 6 months after the initial startup date. These reports shall include all information required in section 40 CFR 60-VV.487.

Condition 163: Compliance Demonstration

Effective between the dates of 02/04/2016 and 02/03/2026

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 163.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: A-00002

Emission Point: 00003

Item 163.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)



Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 164: Contaminant List
Effective between the dates of 02/04/2016 and 02/03/2026



Applicable State Requirement:ECL 19-0301

Item 164.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY998-00-0

Name: VOC

**Condition 165: Malfunctions and start-up/shutdown activities
Effective between the dates of 02/04/2016 and 02/03/2026**

Applicable State Requirement:6 NYCRR 201-1.4

Item 165.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.



Condition 166: Emission Unit Definition
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 166.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-00001

Emission Unit Description:

Consists of Process 001 (Plant A), Process 002 (Plant B), and Process 006 (the storage and transfer operations associated with the formaldehyde distillate and Process 007 (storage and transfer operations associated with the caustic rinse water tank). Air contaminants generated within Emission Unit A-00001 are emitted to the atmosphere via Emission Points 00001 and 00002. Emission Points 00001 and 00002 are each equipped with a catalytic incinerator, identified as Control Units 00001 and 00002, respectively.

Building(s): PROCESS
UTILITY

Item 166.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: A-00002

Emission Unit Description:

Consists of Process 004, which is the methanol storage, transfer and delivery system. The methanol storage tank system consists of five (5) thirty-five thousand (35,000) gallon storage tanks which are vapor balanced with each other. The entire system is equipped with a closed vent system for vapor recovery during methanol delivery and a conservation vent to control the emissions associated with normal tank breathing. Air contaminants generated within Emission Unit A-00002 are emitted to the atmosphere via Emission Point 00003. Emission point 00003 is equipped with a conservation vent, identified as Control Unit K003.

Condition 167: Renewal deadlines for state facility permits
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 167.1:

The owner or operator of a facility having an issued state facility 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.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Condition 168: Compliance Demonstration
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 168.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 168.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 5
232 Golf Course Rd.
Warrensburg, NY 12885

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 169: Visible Emissions Limited
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR 211.2

Item 169.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**** Emission Unit Level ****

Condition 170: Emission Point Definition By Emission Unit
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 170.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00001

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Emission Point: 00001
Height (ft.): 65 Diameter (in.): 18
NYTMN (km.): 4793.179 NYTME (km.): 613.342 Building: PROCESS

Emission Point: 00002
Height (ft.): 65 Diameter (in.): 18
NYTMN (km.): 4793.18 NYTME (km.): 613.344 Building: PROCESS

Item 170.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: A-00002

Emission Point: 00003
Height (ft.): 39 Diameter (in.): 4
NYTMN (km.): 4793.184 NYTME (km.): 613.346

Condition 171: Process Definition By Emission Unit
Effective between the dates of 02/04/2016 and 02/03/2026

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 171.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: 001 Source Classification Code: 3-01-040-20
Process Description:

Formaldehyde Process (Plant A). This formaldehyde plant is capable of producing formaldehyde and a formaldehyde-water solution. The closed loop chemical manufacturing process involves the injection of fresh air and methanol into an enclosed reactor containing an iron-molybdenum oxide catalyst. The methanol and oxygen in the air react to form formaldehyde. The resultant stream contains formaldehyde, unreacted methanol, dimethyl ether, methyl formate, water, carbon monoxide, and inert gases originally contained within the injected ambient air. This stream flows under pressure to an absorber system. The absorber uses water as an absorbent to produce a formaldehyde solution with water (typically 58% formaldehyde).

A portion of the gases exiting the absorber system are recycled back to the beginning of the process and utilized as raw material feed to the reactor. The remaining portion of the gases exiting the absorber system are emitted to the atmosphere via a catalytic incinerator (00001) at Emission Point 00001. The catalytic incinerator is designed to operate with a minimum destruction efficiency of 98% for volatile organic compounds.



This formaldehyde plant is capable of producing formaldehyde-water solution. The plant is capable of producing products at various concentrations of formaldehyde. The operation of the plant at any final product concentration, is substantially similar, and the type and quantity of air emissions is not dependent on the product being manufactured.

MSC intends to manufacture at this plant, without providing notice to the NYSDEC or USEPA of any changes, formaldehyde solutions of any type, concentration or quantity which will not increase the emissions of regulated air contaminants above those levels identified within the State Facility Permit, Section III, Facility Emissions Summary. Since the feed rate of methanol and the destruction efficiency of the catalytic incinerator are the primary factors for determining the quantity of air emissions from the facility, no documentation will be maintained for the purposes of this State Facility Permit in regards to the type, concentration or quantity of final product manufactured.

Emission calculations associated with this process are based on the facility operating at 120% of its design capacity for 8760 hours per year. No restriction on the hours of operation or on the type or amount of material produced will be applicable at this process. To the extent that they are quantifiable, fugitive emissions associated with this process have been included within the calculation of the facility's PTE.

Emission Source/Control: 00001 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00023 - Process

Emission Source/Control: 00025 - Process

Emission Source/Control: 00026 - Process

Item 171.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001

Process: 002

Source Classification Code: 3-01-040-20

Process Description:

Formaldehyde Process (Plant B). This formaldehyde plant is capable of producing a formaldehyde-water solution. The closed loop chemical manufacturing process involves the injection of fresh air and methanol into an enclosed



reactor containing an iron-molybdenum oxide catalyst. The methanol and oxygen in the air react to form formaldehyde.

The resultant stream contains formaldehyde, unreacted methanol, dimethyl ether, methyl formate, water, carbon monoxide, and inert gases originally contained within the injected ambient air. This stream flows under pressure to an absorber system. The absorber uses water as an absorbent to produce a formaldehyde solution with water (typically 58% formaldehyde).

A portion of the gases exiting the absorber system are recycled back to the beginning of the process and utilized as raw material feed to the reactor. The remaining portion of the gases exiting the absorber system are emitted to the atmosphere via a catalytic incinerator (00002) at Emission Point 00002. The catalytic incinerator is designed to operate with a minimum destruction efficiency of 98% for volatile organic compounds.

This formaldehyde plant is capable of producing formaldehyde-water solution. The plant is capable of producing both of these products at various concentrations of formaldehyde or urea-formaldehyde. The operation of the plant at any final product concentration, is substantially similar, and the type of quantity of air emissions is not dependent on the product being manufactured.

MSC intends to manufacture at this plant, without providing notice to the NYSDEC or USEPA of any changes, formaldehyde solutions of any type, concentration or quantity which will not increase the emissions of regulated air contaminants above those levels identified within the State Facility Permit, Section III, Facility Emissions Summary. Since the feed rate of methanol and the destruction efficiency of the catalytic incinerator are the primary factors for determining the quantity of air emissions from the facility, no documentation will be maintained for the purposes of this State Facility Permit in regards to the type, concentration or quantity of final product manufactured.

Emission calculations associated with this process are based on the facility operating at 120% of its design capacity for 8760 hours per year. No restriction on the hours of operation or on the type or amount of material produced will be applicable at this process. To the extent that they are quantifiable, fugitive emissions associated with this process have been included within the calculation of the facility's PTE.

New York State Department of Environmental Conservation

Permit ID: 5-4144-00085/00001

Facility DEC ID: 5414400085



Emission Source/Control: 00002 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00024 - Process

Emission Source/Control: 00027 - Process

Emission Source/Control: 00028 - Process

Item 171.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001

Process: 006

Source Classification Code: 3-01-830-01

Process Description:

Miscellaneous Volatile Organic Liquid Storage, Transfer and Delivery Systems. Formaldehyde and distillate water will all be stored at the facility within bulk storage tanks. The vents associated with these tanks are all vapor balanced back to the distillate storage tank. During the transfer of formaldehyde to tanker trucks, a vapor balance is maintained between the storage tanks and the tanker truck being filled at the time.

The vapors generated from the storage and transfer of these products are first scrubbed with distillate water. The vapors generated within the distillate tank are subsequently fed into the raw material stream for Processes 00001 and 00002 by mixing the distillate vent exhaust with the fresh air intakes for these processes. Contaminants within the distillate vent exhaust are subsequently consumed within the formaldehyde reactors, recovered as products within the absorbers, recycled back to the distillate tank, or exhausted to the atmosphere via one of the two catalytic incinerators at either Emission Point 00001 or 00002, depending on the current operating conditions. In the event that Processes 00001 and 00002 are not operating, the emissions from the distillate tanks are emitted directly to the atmosphere via one of the two catalytic incinerators at either Emission Point 00001 or 00002. The emissions associated with this process are within the material and energy balances associated with Processes 00001 and 00002.

Emission Source/Control: 00001 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER

Emission Source/Control: 00002 - Control
Control Type: CATALYTIC AFTERBURNER WITH HEAT EXCHANGER



- Emission Source/Control: 00004 - Process
- Emission Source/Control: 00005 - Process
- Emission Source/Control: 00006 - Process
- Emission Source/Control: 00016 - Process
- Emission Source/Control: 00029 - Process
- Emission Source/Control: 000T4 - Process
- Emission Source/Control: 00T10 - Process
- Emission Source/Control: 00T37 - Process
- Emission Source/Control: 00T38 - Process
- Emission Source/Control: 00T39 - Process

Item 171.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00001
Process: 007
Process Description:
Caustic soda rinse tank. Caustic soda is used to clean the process equipment. This operation is periodic. The vent from the caustic soda rinse tank discharges to the tank vent system and is ultimately emitted to the atmosphere through one of the two catalytic incinerators.

Emission Source/Control: 00015 - Process
Design Capacity: 6,000 gallons

Item 171.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: A-00002
Process: 004 Source Classification Code: 3-01-830-01
Process Description:
Methanol Storage, Transfer and Delivery System. Methanol will be stored at the facility within five (5) thirty-five thousand (35,000) gallon storage tanks which are vapor balanced with each other. The entire system is equipped with a closed vent system for vapor recovery during methanol delivery and a conservation vent to control the emissions associated with normal tank breathing. Air contaminants generated within Emission Unit A-00002 are emitted to the atmosphere via Emission Point 00003. Emission Point 00003 is equipped with a conservation vent,



identified as Control Unit 00003.

Since the methanol delivery system is a closed vent system the emissions of methanol are not dependent on the throughput of methanol. Rather, the emissions of methanol are dependent upon tank features such as their size, shape, color, average liquid height, and the pressure/vacuum settings of the conservation vent. The attached emission calculations associated with this process are based on each of the five storage tanks contributing to the total emissions for 8760 hours per year. No restriction of the hours of operation or on the amount material processed will be applicable at this process. To the extent that they are quantifiable, fugitive emissions associated with this process have been included within the calculation of the facility's PTE.

Emission Source/Control: 00003 - Control
Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: 00017 - Process

Emission Source/Control: 00018 - Process

Emission Source/Control: 00019 - Process

Emission Source/Control: 00020 - Process

Emission Source/Control: 00021 - Process

Emission Source/Control: 00T40 - Process

