



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 7-3132-00009/00017
Effective Date: 05/20/2015 Expiration Date: 05/19/2020

Permit Issued To: CHEMTRADE SOLUTIONS LLC
90 E HALSEY RD
PARSIPPANY, NJ 07054

Facility: CHEMTRADE SOLUTIONS SYRACUSE
1421 WILLIS AVE
SYRACUSE, NY 13204

Contact: CHRIS A MILLER
EHS MANAGER
1421 WILLIS AVE
SYRACUSE, NY 13204
(734) 846-3345

Description:
Title V renewal for Chemtrade Solutions Syracuse. This facility is a Sodium Nitrite manufacturing facility located in Solvay, New York.

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: ELIZABETH A TRACY
615 ERIE BLVD WEST
SYRACUSE, NY 13204-2400

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 7 HEADQUARTERS



DEC GENERAL CONDITIONS

**** General Provisions ****

For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.

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 7 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 7 Headquarters
Division of Environmental Permits
615 Erie Blvd West
Syracuse, NY 13204-2400
(315) 426-7400

New York State Department of Environmental Conservation

Permit ID: 7-3132-00009/00017

Facility DEC ID: 7313200009



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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90 E HALSEY RD
PARSIPPANY, NJ 07054

Facility: CHEMTRADE SOLUTIONS SYRACUSE
1421 WILLIS AVE
SYRACUSE, NY 13204

Authorized Activity By Standard Industrial Classification Code:
2812 - ALKALIES AND CHLORINE
2819 - INDUSTRIAL INORGANIC CHEMICALS

Permit Effective Date: 05/20/2015

Permit Expiration Date: 05/19/2020



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.4 (a) (7): Fees
 - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
 - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
 - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.4 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
 - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
 - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
 - 18 6 NYCRR 202-1.1: Required Emissions Tests
 - 19 40 CFR Part 68: Accidental release provisions.
 - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
 - 23 6 NYCRR 211.1: Air pollution prohibited
 - 24 6 NYCRR 212.3 (b): Compliance Certification
 - 25 6 NYCRR 212.3 (b): Compliance Certification
 - 26 6 NYCRR 212.5 (d): Compliance Certification
 - 27 6 NYCRR 212.6 (a): Compliance Certification
 - 28 6 NYCRR 212.10 (c) (3): Compliance Certification
 - 29 6 NYCRR 227-2.4 (c) (1) (ii): Compliance Certification
- Emission Unit Level**
- 30 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
 - 31 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=1-OOOOB,Proc=001

- 32 40CFR 60.48c, NSPS Subpart Dc: Recordkeeping and reporting.

EU=U-OOSN2,EP=OOSN2,Proc=002,ES=OOSN2

- 33 6 NYCRR 212.3 (b): Compliance Certification

EU=U-OSN1A

- 34 6 NYCRR 212.5 (d): Compliance Certification

EU=U-OSN1A,EP=00001,Proc=003



- 35 6 NYCRR 200.6: Compliance Certification
- 36 6 NYCRR 212.4 (c): Compliance Certification

EU=U-OSN1A,EP=00001,Proc=003,ES=00SCR

- 37 6 NYCRR 212.5 (d): Compliance Certification
- 38 6 NYCRR 212.5 (d): Compliance Certification
- 39 6 NYCRR 212.10: Compliance Certification
- 40 6 NYCRR 212.11 (b) (5): Compliance Certification

EU=U-OSN3A,EP=OSN3A,Proc=005,ES=OSN3A

- 41 6 NYCRR 212.3 (b): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 42 ECL 19-0301: Contaminant List
- 43 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 44 6 NYCRR 211.2: Visible Emissions Limited



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V



facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,



the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual



report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as



specified in any special permit terms or conditions;
and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 7 Headquarters
615 Erie Boulevard, West
Syracuse, NY 13204-2400

The address for the BQA is as follows:

NYSDEC

New York State Department of Environmental Conservation

Permit ID: 7-3132-00009/00017

Facility DEC ID: 7313200009



Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2016.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY
Averaging Method: ANNUAL TOTAL
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

(1) a copy of each emission statement submitted to the department; and

(2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 215.2



Item 9.1:

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

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**



The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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.

Condition 11: Recycling and Salvage
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 13.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 14: Trivial Sources - Proof of Eligibility



Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 14.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 15: Requirement to Provide Information

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: Right to Inspect

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Off Permit Changes

Effective between the dates of 05/20/2015 and 05/19/2020

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in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 20: Recycling and Emissions Reduction
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:40CFR 82, Subpart F

Item 20.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 21: Emission Unit Definition
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 1-OOO0B

Emission Unit Description:

One natural gas fired boiler with low-NOx burners with a rated heat input of 42 MMBTU/hr constructed in 1994, installed on or about February 15, 2012, and started operation in July 2012.

Item 21.2:

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

Emission Unit: U-OOSN2

Emission Unit Description:

Damp crystals of sodium nitrite pass through drying equipment, from which the exhaust is directed to particulate control equipment and emitted to the atmosphere.

Building(s): 1

Item 21.3:

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

Emission Unit: U-OSN1A

Emission Unit Description:

This emission unit is located in building 1. Two identical production trains convert ammonia into nitrogen oxides (NOx) which is then absorbed in an absorption system utilizing a sodium alkali solution to form sodium nitrite. Gases exiting the system pass through demisting particulate control equipment, a single selective catalytic reduction (SCR) system (which serves both process trains) and are emitted to the atmosphere.

Building(s): 1

Item 21.4:

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

Emission Unit: U-OSN3A

Emission Unit Description:

This emission unit is located in building #1. Sodium nitrite dusts are removed from product handling equipment, directed to particulate control equipment, and the exhaust is emitted to the atmosphere.

Building(s): 1

Condition 22: Progress Reports Due Semiannually

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 22.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 23: Air pollution prohibited

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 211.1

Item 23.1:

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



Condition 25: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.3 (b)

Item 25.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-OOSN2 Emission Point: OOSN2

Emission Unit: U-OSN3A Emission Point: OSN3A

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA RM 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.5 (d)

Item 26.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: U-OSN1A Emission Point: OSN1A

Emission Unit: U-OSN1A Emission Point: OSN1B

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN



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Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Facility shall continue to observe the previous permitted allowable NOx emission limit of 172 lbs/hr/NaNO2-process-train until the selective catalytic reduction (SCR) system is installed and running at steady state conditions.

Manufacturer Name/Model Number: Horiba analyzer

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 172 pounds per hour

Reference Test Method: 40 CFR 60 PS2, App B & F

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-OOSN2	Emission Point: OOSN2
Emission Unit: U-OSN1A	Emission Point: 00001
Emission Unit: U-OSN1A	Emission Point: OSN1A
Emission Unit: U-OSN1A	Emission Point: OSN1B
Emission Unit: U-OSN3A	Emission Point: OSN3A

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Opacity shall not exceed 20% over any six minute average, for any emission point. Facility shall continue keeping a log of daily opacity observations, and will record whether normal or abnormal opacity is observed. If necessary, at

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the Department's discretion an EPA Reference Method 9 opacity evaluation shall be performed.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA RM9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.10 (c) (3)

Item 28.1:
The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 28.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The Department has determined that the installation of Selective Catalytic Reduction (SCR) NO_x control technology on the sodium nitrite production trains, as required by the conditions of this Title V permit, constitutes Reasonably Available Control Technology (RACT) for this facility. This determination must be approved by USEPA as a single source NO_x RACT SIP revision.

Monitoring Frequency: SINGLE OCCURRENCE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 29: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 227-2.4 (c) (1) (ii)

Item 29.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

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Emission Unit: 1-0000B
Process: 001

Emission Point: OSN4A
Emission Source: BLR01

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

This condition applies to natural gas only fired mid-size boilers. The owner or operator shall submit a testing protocol to the Department for approval a minimum of 30 days prior to any stack testing. Compliance testing shall be conducted in accordance with 40 CFR 60, Appendix A prior to May 15, 2015.

The owner or operator will maintain records on-site for a minimum of five years.

The compliance deadline, with the emission limitation listed in this condition, is July, 1 2014. Compliance with the monitoring, record keeping, or reporting requirements listed in this condition begins on July, 1 2014.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: .05 pounds per million Btus
Reference Test Method: 40 CFR 60 - Appendix A, RM 7, 7E, 19
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2015.
Subsequent reports are due every 6 calendar month(s).

****** Emission Unit Level ******

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 30.1:

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

Emission Unit: 1-0000B

Emission Point: OSN4A

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Height (ft.): 75 Diameter (in.): 44
NYTMN (km.): 4768.525 NYTME (km.): 401.628 Building: PARKINGLOT

Item 30.2:

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

Emission Unit: U-OOSN2

Emission Point: OOSN2
Height (ft.): 69 Diameter (in.): 30
NYTMN (km.): 4768.572 NYTME (km.): 401.442 Building: 1

Item 30.3:

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

Emission Unit: U-OSN1A

Emission Point: 00001
Height (ft.): 75 Diameter (in.): 24
NYTMN (km.): 4768.488 NYTME (km.): 401.803 Building: 1

Emission Point: OSN1A
Height (ft.): 156 Diameter (in.): 12
NYTMN (km.): 4768.499 NYTME (km.): 401.445 Building: 1

Emission Point: OSN1B
Height (ft.): 156 Diameter (in.): 12
NYTMN (km.): 4768.496 NYTME (km.): 401.477 Building: 1

Item 30.4:

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

Emission Unit: U-OSN3A

Emission Point: OSN3A
Height (ft.): 73 Diameter (in.): 23
NYTMN (km.): 4768.56 NYTME (km.): 401.407 Building: 1

Condition 31: Process Definition By Emission Unit
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 31.1:

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

Emission Unit: 1-OOOOB
Process: 001 Source Classification Code: 1-02-006-01
Process Description:
One boiler with a heat input rating of 42 MMBTU/hr,
firing natural gas.



Emission Source/Control: BLR01 - Combustion

Item 31.2:

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

Emission Unit: U-OOSN2

Process: 002

Source Classification Code: 3-01-999-99

Process Description:

The process liquor is transferred to a heated evaporator where product crystals are formed. Crystals pass through a centrifuge to separate product crystals from the mother liquor. Solid product is directed through two driers, and a product separation cyclone. Exhaust gas is directed to the scrubber for particulate control.

Emission Source/Control: OOSN2 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: S00TD - Process

Emission Source/Control: S0FBD - Process

Item 31.3:

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

Emission Unit: U-OSN1A

Process: 003

Source Classification Code: 3-01-999-99

Process Description:

Two production trains convert ammonia into nitrogen oxides which is then absorbed in an absorption (tower) system utilizing a sodium alkali solution to form sodium nitrite. Gases exiting the system pass through demisting particulate control equipment, a single selective catalytic reduction (SCR) system (which serves both process trains) and are emitted to the atmosphere.

Emission Source/Control: 00SCR - Control

Control Type: SELECTIVE CATALYTIC REDUCTION (SCR)

Emission Source/Control: 1SN1A - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 1SN1B - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 2SN1A - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: 2SN1B - Control

Control Type: MIST ELIMINATOR

Emission Source/Control: OSN1A - Process



Emission Source/Control: OSN1B - Process

Item 31.4:

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

Emission Unit: U-OSN3A

Process: 005

Source Classification Code: 3-01-999-99

Process Description:

Sodium nitrite dusts are removed from product handling equipment, directed to particulate control equipment, and exhaust is emitted to the atmosphere.

Emission Source/Control: OSN3A - Control

Control Type: WET SCRUBBER

Emission Source/Control: OOOPL - Process

Emission Source/Control: OORCL - Process

Emission Source/Control: S0FCS - Process

Condition 32: Recordkeeping and reporting.

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:40CFR 60.48c, NSPS Subpart Dc

Item 32.1:

This Condition applies to Emission Unit: 1-OOOOB

Process: 001

Item 32.2:

The facility shall maintain reports and records in accordance with the provisions of this section 40 CFR 60-Dc.48c.

Condition 33: Compliance Certification

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.3 (b)

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OOSN2

Emission Point: OOSN2

Process: 002

Emission Source: OOSN2

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

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Item 33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Monitor and record electric current on the spray pump to the particulate removal unit. Compliance will be determined based on instantaneous measurements taken every 2 hours. The instantaneous amperage shall not drop below 5 amps or exceed 15 amps for greater than a 1-hr period.

Manufacturer Name/Model Number: LFE INSTRUMENTS/V3346SNG

Parameter Monitored: CURRENT/CURRENT DRAW

Lower Permit Limit: 5 amperes

Upper Permit Limit: 15 amperes

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 212.5 (d)

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Chemtrade shall submit for Department approval a Start-up, Shutdown and Malfunction (SSM) Plan within 60 days of permit issuance.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 35: Compliance Certification

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement:6 NYCRR 200.6



Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A Emission Point: 00001
Process: 003

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The SCR stack must be built in accordance with the NO₂ NAAQS modeling performed as part of the application for this permit. Any alternative stack parameters must be reviewed and approved by the Department prior to implementing such changes.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 36: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A Emission Point: 00001
Process: 003

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emission of solid particulates are limited to less than 0.05 grains per dry standard cubic foot (gr/dscf) of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing shall be conducted during the initial SCR compliance testing. Subsequent testing shall be done upon request by the Department pursuant to 6 NYCRR Part 202-1.

Upper Permit Limit: 0.05 grains per dscf

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Reference Test Method: EPA RM 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 37: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A Emission Point: 00001
Process: 003 Emission Source: 00SCR

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emissions from Emission Point 00001 are subject to 6 NYCRR Part 212.4(a). The Department has assigned an environmental rating of "B" for NOx emissions from this source. Based on Table 2 of Part 212.9, the degree of air cleaning required for a "B" rated contaminant with an Emission Rate Potential (ERP) between 100 and 500 lb/hr (the NOx ERP for EP 00001 is 242 lb/hr) is 94% control. However, 6 NYCRR Part 212.5(d) allows for a lesser degree of control if Best Available Control Technology (BACT) has been applied to a source. The Department has determined that SCR meeting the requirements of this permit constitutes BACT for this source, and satisfies the requirements of 6 NYCRR Part 212.5(d).

The SCR system shall initially achieve 90% or greater reduction of NOx emissions by weight. Compliance testing is required to demonstrate compliance with the initial 90% control requirement. Initial compliance testing shall be conducted within 180 days of initial startup of the SCR, or within 60 days of reaching maximum sodium nitrite production levels after startup of the SCR, whichever comes first. Start-up of the SCR unit is expected to occur on or about November 1, 2015. Thus, compliance testing of the source shall be performed no later than April 29, 2016.

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Demonstration of compliance with the initial 90% control requirement shall be based on 3 one hour test runs conducted during steady state conditions. At least 30 days prior to testing a stack testing protocol shall be submitted to the Department for review and approval. SCR NOx inlet and outlet emission rates and concentrations shall be measured. Steady state conditions shall not include periods of start-up, shutdown or malfunction. A detailed description of what periods shall be considered start-up, shut-down and/or malfunction will be provided in the Start-up, Shutdown and Malfunction Plan (SSM Plan) to be submitted to, and approved by the Department. The facility will submit the SSM Plan to the Department within 60 days of permit issuance.

Manufacturer Name/Model Number: Horiba analyzer

Parameter Monitored: OXIDES OF NITROGEN

Lower Permit Limit: 90 percent reduction

Reference Test Method: EPA RM 7E

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 38: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 212.5 (d)

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A

Emission Point: 00001

Process: 003

Emission Source: 00SCR

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Chemtrade will continuously monitor percent removal of NOx from the SCR system as detailed in the facility Compliance Assurance Monitoring (CAM) Plan. In the event that the NOx monitoring equipment confirms a percent removal of less than 90% for any compliance period (as defined below), the facility will make arrangements to replace the SCR catalyst during the next subsequent scheduled unit shutdown, unless the mass emissions of NOx from the SCR system are continuously maintained at a rate



equal to or less than 24 lb/hr at the SCR outlet. Chemtrade shall notify the Department in writing within 2 business days of triggering this requirement. The notification shall include the estimated timeframe for the next scheduled unit shutdown.

In addition, Chemtrade shall implement the SCR catalyst manufacturer's recommended catalyst management program through replacement if one-third of the catalyst every year (consecutive 12 month period). Chemtrade shall also notify the Department upon start up of the unit after SCR catalyst replacement within 2 business days of start up.

Under no circumstances shall operation of the SCR system and sodium nitrite process be allowed when the NO_x monitoring equipment confirms percent NO_x removal has fallen below 80% (for one entire applicable compliance period), except during periods of start-up, shutdown, malfunction, or when mass emissions of NO_x at the SCR outlet are otherwise continually maintained at a rate equal to or less than 24 lbs/hr, for any compliance period.

The SCR system shall be kept in a satisfactory state of maintenance and repair, it shall be operated in a manner consistent with the manufacturer's specifications and recommendations and also good engineering practices; including optimal ammonia flow rates and all other operational parameters.

Compliance with the percent removal requirements specified in this condition, shall be based on a compliance period of 24 hour averages during the ozone season (May, June, July, August and September) and a 30-day rolling averages outside of the ozone season.

CEMS Averaging Procedures: 24 hour rolling averages will be calculated as the average of the previous 24 valid one hour block averages. For a one hour block average to be deemed valid, the following must be true:

1. The facility operated at least one train in steady state operation for at least 75% of the hour, and
2. At least 3 sample data points, spaced no less than 15 minutes apart, were obtained during the hour and
3. The SCR system and/or the other sodium nitrite production train are not in a period of start-up, shutdown or malfunction mode.

30 day rolling averages will be calculated as the average of all valid 1 hour block averages over the previous 30

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Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Chemtrade shall continuously monitor NOx emissions from the SCR outlet as detailed in the facility Compliance Assurance Monitoring (CAM) Plan. NOx emissions shall not exceed 48 lbs/hr during steady-state operating conditions.

Compliance with the limit will be based on a 1-hour average. Steady state conditions shall not include periods of start-up, shutdown, or malfunction, as detailed in the SSM Plan already referenced elsewhere in this permit.

Manufacturer Name/Model Number: Horiba analyzer

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 48 pounds per hour

Reference Test Method: 40 CFR 60 PS2, App B & F

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).

Condition 40: Compliance Certification

Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-OSN1A

Emission Point: 00001

Process: 003

Emission Source: 00SCR

Regulated Contaminant(s):

CAS No: 007664-41-7

AMMONIA

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Chemtrade will continuously monitor ammonia slip from the SCR system. Ammonia emissions shall not exceed 5 ppm, during steady state operational conditions of the sodium nitrite process except for periods of start-up, shutdown or malfunction. Compliance with the limit will be based

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Facility DEC ID: 7313200009



on a 30-day average. The 30-day average shall be determined using the procedures for calculating the NOx 30-day averages contained in this permit.

CEMS Monitoring Plan: Within 60 days of the effective date of the permit, the facility shall submit to the Department for review and approval a CEMS monitoring plan that shall identify the following information for the ammonia outlet systems:

1. Monitoring instrument and system specifications including monitor makes and models, operating ranges, and response times.
2. Quality Assurance procedures including frequency and description of all periodic system calibrations.
3. Description of the DAHS and the calculation methods used for all compliance determinations.

CEMS Reporting: The facility shall submit a Quarterly CEMS report identifying all periods of excess emissions and CEMS downtime for each calendar year quarter. This report shall be received by the Department no later than 30 calendar days after the end of each calendar year quarter.

Manufacturer Name/Model Number: NH3 Analyzer
Parameter Monitored: AMMONIA
Upper Permit Limit: 5 parts per million (by volume)
Reference Test Method: EPA RM 17
Monitoring Frequency: CONTINUOUS
Averaging Method: 30-DAY AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable Federal Requirement: 6 NYCRR 212.3 (b)

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: U-OSN3A Emission Point: OSN3A
Process: 005 Emission Source: OSN3A

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 41.2:
Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 7-3132-00009/00017

Facility DEC ID: 7313200009



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

Monitoring Description:

Monitor and record electric current on the spray pump to the particulate removal unit. Compliance will be determined based upon instantaneous measurements taken every two hours. The instantaneous current (amperage) shall not drop below 3 amps or exceed 10 amps for greater than a 1-hr period.

Manufacturer Name/Model Number: LFE INSTRUMENTS/V3346SNG

Parameter Monitored: CURRENT/CURRENT DRAW

Lower Permit Limit: 3 amperes

Upper Permit Limit: 10 amperes

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2015.

Subsequent reports are due every 6 calendar month(s).



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: Emergency Defense - 6 NYCRR 201-1.5

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

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

(1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

(3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item 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



(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 44: Visible Emissions Limited
Effective between the dates of 05/20/2015 and 05/19/2020

Applicable State Requirement:6 NYCRR 211.2

Item 44.1:

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.