

Facility DEC ID: 8189900038

**PERMIT
Under the Environmental Conservation Law (ECL)**

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-1899-00038/02003
Effective Date: 10/14/2020 Expiration Date: 10/13/2030

Permit Issued To: SUMMIT LUBRICANTS INC
4D TREADEASY AVE
BATAVIA, NY 14020-3010

Contact: SEAN M MCMAHON
SUMMIT LUBRICANTS
4080 PEARL STREET RD
BATAVIA, NY 14020
(585) 236-8063

Facility: SUMMIT LUBRICANTS INC
4080 PEARL ST & 4D TREADEASY AVE
BATAVIA, NY 14021

Description:
Air State Facility permit for combined emissions from two Summit Lubricant facilities; one at 4080 Pearl Street, and the other at 4D Treadeasy Avenue, Batavia, NY (both formerly under registrations). Facility has one emission Unit 0-00001 which is the process of manufacturing industrial and commercial greases in charged process kettles heated using natural gas fired hot oil systems. The production process results in emissions of particulate, liquid particulate and volatile organic compounds. Liquid particulate (oil mist) and volatile organic compounds are controlled using a venture water scrubber and three carbon beds while the particulate is controlled using dust collectors. The facility is a natural minor with no caps.

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: KIMBERLY A MERCHANT
6274 E AVON LIMA RD
AVON, NY 14414-9519

Authorized Signature: _____ Date: ___ / ___ / ____

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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.

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- 5 5 Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

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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 the expiration of permits for Title V and 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.

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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 8 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 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: SUMMIT LUBRICANTS INC
4D TREADEASY AVE
BATAVIA, NY 14020-3010

Facility: SUMMIT LUBRICANTS INC
4080 PEARL ST & 4D TREADEASY AVE
BATAVIA, NY 14021

Authorized Activity By Standard Industrial Classification Code:
2992 - LUBRICATING OILS AND GREASES

Permit Effective Date: 10/14/2020

Permit Expiration Date: 10/13/2030

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FEDERALLY ENFORCEABLE CONDITIONS

FINAL

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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,

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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: 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 F: 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 G: 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 H: Proof of Eligibility for Sources Defined as Trivial

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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 I: 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 J: 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 K: Permit Exclusion - ECL 19-0305

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

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

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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: Visible Emissions Limited
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

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.

Condition 2: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control of particulate emissions released from new and modified process emission sources. Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per

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cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

As per 212-1.7(a) 'Sampling and monitoring' section, facility owners and/or operators of a process emission source required by the department to demonstrate compliance with this Part may be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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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: 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.

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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 C: 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 3: Contaminant List
Effective between the dates of 10/14/2020 and 10/13/2030**

Applicable State Requirement: ECL 19-0301

Item 3.1:

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

CAS No: 0NY075-00-5
Name: PM-10

**Condition 4: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/14/2020 and 10/13/2030**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 4.1:

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(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 5: Emission Unit Definition
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 5.1:

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

Emission Unit: 0-00001

Emission Unit Description:

Emission Unit 0-00001 is the process of manufacturing industrial and commercial greases in charged process kettles heated using natural gas fired hot oil system. The production process results in emissions of particulates, liquid particulate and volatile organic compounds. Liquid particulate (oil mist) and volatile organic compounds are controlled using a venture water scrubber and three carbon

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beds while particulate is controlled using dust collectors.

Condition 6: Renewal deadlines for state facility permits
Effective between the dates of 10/14/2020 and 10/13/2030

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

Item 6.1:

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.

Condition 7: CLCPA Applicability
Effective between the dates of 10/14/2020 and 10/13/2030

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

Item 7.1:

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

Condition 8: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

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

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

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 8
6274 East Avon-Lima Rd.
Avon, NY 14414

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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Condition 9: Air pollution prohibited
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 211.1

Item 9.1:

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.

Condition 10: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 211.1

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department.

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 1/30/2021.

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

Condition 11: Compliance Demonstration

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Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement: 6 NYCRR 212-1.6 (a)

Item 11.1:

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

Emission Unit: 0-00001	Emission Point: 00001
Emission Unit: 0-00001	Emission Point: 00002
Emission Unit: 0-00001	Emission Point: 00004

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

No person shall 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.

The permittee will conduct daily observations of visible emissions from the emission points to which this condition applies while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212-1.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department

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Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration

Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 12.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: KET

Emission Source: K0012

Emission Unit: 0-00001

Process: KET

Emission Source: K0013

Emission Unit: 0-00001

Process: KET

Emission Source: K0015

Item 12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility shall keep a record log of weekly outlet VOC concentration for each fixed-bed carbon adsorption unit while the sources are operating. Any readings collected outside of 75% of the limit must be investigated, the cause of recorded, and any corrective activity taken must be recorded. If the facility emissions exceed 10 ppm at the outlet the operations must be shut down. The carbon bed media shall be changed prior to the operation of connected sources.

Parameter Monitored: VOC

Upper Permit Limit: 10 parts per million (by volume)

Monitoring Frequency: WEEKLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 13: Compliance Demonstration

Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The alternative monitoring method plan for the carbon beds must be followed. The plan must be kept onsite at all time and made available to the department upon request. Failure to following this plan or failure for the plan to control odor through carbon bed weekly testing may result in the department requiring the installation of continuous VOC monitors on each carbon bed outlet. Modifications to this plan must be submitted to the department for review and approval.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 14.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: KET

Emission Source: K0012

Emission Unit: 0-00001

Process: KET

Emission Source: K0015

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure differential across the carbon bed cooling coils will be monitored at least once per week and maintained below 10 inches of water. This pressure differential shall not apply during periods of start-up or times when the sources are not operating. If the pressure differential recorded during normal operation is outside of this range, Summit Lubricants shall inspect the cooling coils and initiate corrective action as necessary. Pressure differential readings and maintenance records shall be kept on site and made available to the Department upon request.

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Parameter Monitored: PRESSURE DROP

Upper Permit Limit: 10 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-00001

Process: KET

Emission Source: K0012

Emission Unit: 0-00001

Process: KET

Emission Source: K0015

Item 15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The maximum temperature across the carbon bed cooling coils will be monitored at least once per week and maintained below 90 degrees Fahrenheit. This shall not apply during periods when the sources are not operating. Summit Lubricants shall inspect the cooling coils regularly and initiate corrective action as necessary. Readings and maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 90 degrees Fahrenheit

Monitoring Frequency: WEEKLY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

The Compliance Demonstration applies to:

Emission Unit: 0-00001	
Process: KET	Emission Source: K0012
Emission Unit: 0-00001	
Process: KET	Emission Source: K0013
Emission Unit: 0-00001	
Process: KET	Emission Source: K0015

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility shall keep a record log of weekly the pressure drop across each fixed-bed carbon adsorption unit while the sources are operating. Any readings collected outside of 10 inches of water of the limit must be investigated, the cause of recorded, and any corrective activity taken must be recorded. The issue is unable to be corrected the carbon bed must be maintained.

Parameter Monitored: PRESSURE DROP
Upper Permit Limit: 10 inches of water
Monitoring Frequency: WEEKLY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-1.7 (b)

Item 17.1:

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

Emission Unit: 0-00001	
Process: KET	Emission Source: K0012
Emission Unit: 0-00001	
Process: KET	Emission Source: K0015

Item 17.2:

Compliance Demonstration shall include the following monitoring:

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

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Monitoring Description:

The pressure drop across the UHF® Filters will be monitored at least once per week and maintained between 30 and 5 inches of water. This pressure drop range shall not apply during periods of start-up following filter replacement. If the pressure drop recorded during normal operation is outside of this range, Summit Lubricants shall inspect the dust collector and initiate corrective action as necessary. Pressure drop readings and maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 5 inches of water

Upper Permit Limit: 30 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement: 6 NYCRR 212-2.4 (b)

Item 18.1:

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

Emission Unit: 0-00001

Process: KET

Emission Source: K0014

Item 18.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The wet venturi scrubber main nozzle will be kept in good working order and be operating when emissions are directed towards it. The water pressure of the main nozzle line shall be recorded weekly in a log. The main nozzle water pressure shall be 8 PSI or greater at all times. If there is deviation, then corrective action must be taken to restore the proper flow rate.

Parameter Monitored: PRESSURE

Lower Permit Limit: 8 pounds per square inch gauge

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Condition 19: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Item 19.1:

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

Emission Unit: 0-00001

Process: KET

Emission Source: K0014

Item 19.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The wet venturi scrubber large hole nozzle will be kept in good working order and be operating when emissions are directed towards it. The water pressure of the large hole nozzle line shall be recorded weekly in a log. The large hole nozzle water pressure shall be 4 PSI or greater at all times. If there is deviation, then corrective action must be taken to restore the proper flow rate.

Parameter Monitored: PRESSURE

Lower Permit Limit: 4 pounds per square inch gauge

Monitoring Frequency: WEEKLY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED
 VALUE AT ANY TIME

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Item 20.1:

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

Emission Unit: 0-00001

Process: KET

Emission Source: K0008

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

The rotocyclone will be kept in good working order and be operating when emissions are directed towards it. The water pressure of the rotocyclone line shall be recorded weekly in a log. The rotocyclone water pressure shall be 40 PSI or greater at all times. If there is deviation, then corrective action must be taken to restore the proper flow rate..

Parameter Monitored: PRESSURE
 Lower Permit Limit: 40 pounds per square inch gauge
 Monitoring Frequency: WEEKLY
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 21: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Item 21.1:

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

Emission Unit: 0-00001
 Process: KET Emission Source: K0014

Item 21.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The wet venturi scrubber small hole nozzle will be kept in good working order and be operating when emissions are directed towards it. The water pressure of the nozzle line shall be recorded weekly in a log. The small hole nozzle water pressure shall be 4 PSI or greater at all times. If there is deviation, then corrective action must be taken to restore the proper flow rate.

Parameter Monitored: PRESSURE
 Lower Permit Limit: 4 pounds per square inch gauge
 Monitoring Frequency: WEEKLY
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Item 22.1:

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

Emission Unit: 0-00001

Process: KET

Emission Source: K0003

Item 22.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the dust collectors shown above will be monitored at least once per week and maintained between 1 and 9 inches of water. This pressure drop range shall not apply during periods of start-up following filter replacement. If the pressure drop recorded during normal operation is outside of this range, Summit Lubricants shall inspect the dust collector and initiate corrective action as necessary. Pressure drop readings and maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 9 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 23: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Item 23.1:

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

Emission Unit: 0-00001

Process: KET

Emission Source: K0001

Emission Unit: 0-00001

Process: KET

Emission Source: K0002

Emission Unit: 0-00001

Process: KET

Emission Source: K0009

Emission Unit: 0-00001

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Process: KET Emission Source: K0010

Emission Unit: 0-00001
 Process: KET Emission Source: K0011

Item 23.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the dust collectors shown above will be monitored at least once per week and maintained between 1 and 6 inches of water. This pressure drop range shall not apply during periods of start-up following filter replacement. If the pressure drop recorded during normal operation is outside of this range, Summit Lubricants shall inspect the dust collector and initiate corrective action as necessary. Pressure drop readings and maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP
 Lower Permit Limit: 1 inches of water
 Upper Permit Limit: 6 inches of water
 Monitoring Frequency: WEEKLY
 Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
 RANGE EXCEPT DURING STARTUP/SHUTDOWN
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 24: Compliance Demonstration
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement: 6 NYCRR 212-2.4 (b)

Item 24.1:

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

Emission Unit: 0-00001
 Process: KET Emission Source: K0004

Emission Unit: 0-00001
 Process: KET Emission Source: K0005

Emission Unit: 0-00001
 Process: KET Emission Source: K0006

Emission Unit: 0-00001
 Process: KET Emission Source: K0007

Item 24.2:

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The pressure drop across the dust collectors shown above will be monitored at least once per week and maintained between 1 and 5 inches of water. This pressure drop range shall not apply during periods of start-up following filter replacement. If the pressure drop recorded during normal operation is outside of this range, Summit Lubricants shall inspect the dust collector and initiate corrective action as necessary. Pressure drop readings and maintenance records shall be kept on site and made available to the Department upon request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 5 inches of water

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 25: Emission Point Definition By Emission Unit
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1:

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

Emission Unit: 0-00001

Emission Point: 00001

Height (ft.): 23 Diameter (in.): 12
NYTMN (km.): 4765.259 NYTME (km.): 238.263

Emission Point: 00002

Height (ft.): 29 Diameter (in.): 15
NYTMN (km.): 4765.259 NYTME (km.): 238.263

Emission Point: 00003

Height (ft.): 21 Diameter (in.): 14
NYTMN (km.): 4765.259 NYTME (km.): 238.263

Emission Point: 00004

Height (ft.): 23 Diameter (in.): 15

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

NYTMN (km.): 4765.259 NYTME (km.): 238.263

Condition 26: Process Definition By Emission Unit
Effective between the dates of 10/14/2020 and 10/13/2030

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 26.1:

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

Emission Unit: 0-00001

Process: KET

Source Classification Code: 3-06-100-01

Process Description:

Manufacturing industrial and commercial greases in
charged process kettles heated using natural gas fired hot
oil system

Emission Source/Control: K0001 - Control

Control Type: FABRIC FILTER

Emission Source/Control: K0002 - Control

Control Type: FABRIC FILTER

Emission Source/Control: K0003 - Control

Control Type: FABRIC FILTER

Emission Source/Control: K0004 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0005 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0006 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0007 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0008 - Control

Control Type: WET ROTOCLONE

Emission Source/Control: K0009 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0010 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0011 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: K0012 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Emission Source/Control: K0013 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: K0014 - Control
Control Type: VENTURI SCRUBBER

Emission Source/Control: K0015 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: IK001 - Process
Design Capacity: 9,500 gallons per batch

Emission Source/Control: IK002 - Process
Design Capacity: 14,500 gallons per batch

Emission Source/Control: IK003 - Process
Design Capacity: 10,000 gallons per batch

Emission Source/Control: IK004 - Process
Design Capacity: 13,500 gallons per batch

Emission Source/Control: IK005 - Process
Design Capacity: 12,000 gallons per batch

Emission Source/Control: IK006 - Process
Design Capacity: 10,000 gallons per batch

Emission Source/Control: IK007 - Process
Design Capacity: 13,000 gallons per batch

Emission Source/Control: IK008 - Process
Design Capacity: 20,000 gallons per batch

Emission Source/Control: IK009 - Process
Design Capacity: 15,000 gallons per batch

Emission Source/Control: IK010 - Process
Design Capacity: 2,000 gallons per batch

Emission Source/Control: IK011 - Process
Design Capacity: 2,500 gallons per batch

Emission Source/Control: IK012 - Process
Design Capacity: 14,000 gallons per batch

Emission Source/Control: IK013 - Process
Design Capacity: 48,000 gallons per batch

Emission Source/Control: IK014 - Process
Design Capacity: 2,300 gallons per batch

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038

Emission Source/Control: IK021 - Process
Design Capacity: 35,000 gallons per batch

Emission Source/Control: IK022 - Process
Design Capacity: 35,000 gallons per batch

Emission Source/Control: IK024 - Process
Design Capacity: 30,000 gallons per batch

Emission Source/Control: IK025 - Process
Design Capacity: 22,500 gallons per batch

Permit ID: 8-1899-00038/02003

Facility DEC ID: 8189900038