



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-4538-00003/00099
Effective Date: 05/08/2008 Expiration Date: No expiration date

Permit Issued To: EVANS CHEMETICS LP
33 WOOD AVE SOUTH
ISELIN, NJ 08830

Contact: STEVEN BRUSSO
EVANS CHEMETICS LP
228 E MAIN ST
WATERLOO, NY 13165
(315) 539-9627

Facility: EVANS CHEMETICS LP
228 E MAIN ST
WATERLOO, NY 13165

Description:
Initial Air State Facility Permit, replacing a Title V Facility Permit, for a chemical batch plant producing organic sulfur intermediates used in the cosmetic, pharmaceutical, and plastic industries.

The facility was subject to Part 201-6 (Title V) regulations due to potential emissions in excess of 100 tons per year of SO₂, 10 tons per year of individual HAP compounds, and 25 tons per year total HAP. The Title V Permit also included restrictions on VOC emissions to below the Part 212.10 VOC RACT threshold of 50 tons per year, and NO_x emissions to below the Part 227-2 NO_x RACT threshold of 100 tons per year.

Replacement of 3 fuel oil fired boilers with 2 natural gas fired boilers at the facility has reduced potential SO₂ emissions to less than 10 tons per year, and potential NO_x emissions to less than 40 tons per year.

This permit includes conditions to restrict emissions to below Title V thresholds of 25 tons per year total HAP, and 10 tons per year each of individual HAP compounds. It also continues the restriction on facility emissions of VOC to below 50 tons per year. In the Title V Facility Permit, this capped VOC emissions below the Part 212.10 RACT threshold. The same limit caps VOC emissions below the Title V threshold.

Process changes reduce potential HAP emissions to below Title V thresholds by directing methyl isobutyl ketone (MIBK) solvent emissions, from two organic synthesis processes, to refrigerated condensers for recovery, with the gas stream leaving the condensers being directed to the air intake of a natural gas fired boiler for 95 percent destruction of the unrecovered MIBK.



In addition, the facility remains subject to the 0.01 ppm Hydrogen Sulfide concentration standard in Part 257-10.

Emission Units are:

1-BOILR, consisting of two natural gas fired boilers, Unit E and Unit F. Unit E is rated at 44.3 MMBTU/hr, and Unit F is rated at 33.5 MMBTU/hr.

1-PROCS: consisting of all chemical production and storage activities. Emission sources include raw material and product storage tanks, reactors, receivers, and other process vessels. Emission controls are based on the individual processes, and some require operation of scrubbers for compliance.

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: DAVID L BIMBER
 DIVISION OF ENVIRONMENTAL PERMITS
 6274 EAST AVON LIMA RD
 AVON, NY 14414-9519

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

No regulated activity without Dept approval
Submission of application for permit modification or renewal-REGION 8
HEADQUARTERS



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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 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: 6NYCRR 621.13

Item 4.1:

The Department reserves the right 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: No regulated activity without Dept approval
Applicable State Requirement: ECL 3-0301.2(m)

Item 5.1:

No regulated activity, including any construction activities or other physical alteration of the site as authorized by this permit, can commence prior to the permittee's receipt of written notice from the Department stating that the outstanding violations of the Environmental Conservation Law (ECL) at this site have been resolved to the Department's satisfaction.

Condition 6: Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 6.1:

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
(716) 226-2466

New York State Department of Environmental Conservation

Permit ID: 8-4538-00003/00099

Facility DEC ID: 8453800003



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:EVANS CHEMETICS LP
33 WOOD AVE SOUTH
ISELIN, NJ 08830

Facility: EVANS CHEMETICS LP
228 E MAIN ST
WATERLOO, NY 13165

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

Permit Effective Date: 05/08/2008

Permit Expiration Date: No expiration date.



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

No regulated activity without Dept approval
Submission of application for permit modification or renewal-REGION 8 HEADQUARTERS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 201-7.2: Facility Permissible Emissions
- *2 6NYCRR 201-7.2: Capping Monitoring Condition
- *3 6NYCRR 201-7.2: Capping Monitoring Condition

Emission Unit Level

EU=1-BOILR,Proc=GAS,ES=UNITF

- 4 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 5 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

EU=1-PROCS

- 6 6NYCRR 212.6(a): Compliance Demonstration

EU=1-PROCS,EP=00125

- 7 6NYCRR 212.4(a): Compliance Demonstration

EU=1-PROCS,EP=00127

- 8 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00202

- 9 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00235

- 10 6NYCRR 212.4(a): Compliance Demonstration
- 11 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00240

- 12 6NYCRR 212.4(a): Compliance Demonstration
- 13 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00305



14 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00403

15 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00404

16 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00410

17 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=00416

18 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=01006

19 6NYCRR 212.4(c): Compliance Demonstration

EU=1-PROCS,EP=01602

20 6NYCRR 212.5(d): Compliance Demonstration

21 6NYCRR 257-10: Compliance Demonstration

EU=1-PROCS,EP=2AB18

22 6NYCRR 212.4(c): Compliance Demonstration

EU=1-PROCS,EP=2AB23

23 6NYCRR 212.4(a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

24 ECL 19-0301: Contaminant List

25 6NYCRR 201-1.4: Unavoidable noncompliance and violations

26 6NYCRR 201-5: Emission Unit Definition

27 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

28 6NYCRR 201-5: Emission Point Definition By Emission Unit

29 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7

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



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

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

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

(4) The facility owner and/or operator notified the Department

within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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



Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item J: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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.

Item L: Open Fires - 6 NYCRR Part 215

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

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

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

FEDERAL APPLICABLE REQUIREMENTS



The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 000108-10-1	PTE: 19,800 pounds per year
Name: 2-PENTANONE, 4-METHYL	

CAS No: 0NY998-00-0	PTE: 99,000 pounds per year
Name: VOC	

Condition 2: Capping Monitoring Condition
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7.2

Item 2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6NYCRR 201-6

Item 2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2.3:

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.

Item 2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which



hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility is restricted to emit less than 50 tpy of Volatile Organic Carbon (VOC), calculated on an annual maximum (rolled monthly) basis. Compliance is to be demonstrated by maintaining records of products produced, and mass balance equations using emission factors from various processes. Records shall be retained on site, and reported in the annual capping certification report.

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 1/30/2009.

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

**** Emission Unit Level ****

Condition 4: Compliance Demonstration

Effective between the dates of 05/08/2008 and Permit Expiration Date

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

Item 4.1:

The Compliance Demonstration activity will be performed for:



Emission Unit: 1-BOILR

Process: GAS

Emission Source: UNITF

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 5: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

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

Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Process: GAS

Emission Source: UNITF

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record, for determining compliance with the NSPS requirements.

**** NOTE**** Records shall be maintained for a minimum of five years to achieve compliance with the requirements of Title V.

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 6: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.6(a)



Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Opacity from any emission point in this emission unit shall not exceed 20% for any six minute period. Normal operation of the sources does not result in visible emissions. Any abnormal operations that may cause visible emissions shall be corrected and logged.

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 1/30/2009.

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

Condition 7: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(a)

Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 00125

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Hydrogen Chloride emission limit for EP00125 is 0.015 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flow switch with an alarm on losses of flow and the scrubber solution normality before each use of the scrubber. The scrubber solution is changed when the HCL normality goes above 1.0. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.



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 1/30/2009.

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

Condition 8: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00127

Regulated Contaminant(s):
CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Hydrogen Sulfide emission limit for EP00127 is 0.067 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flow switch with an alarm on losses of flow and the scrubber solution normality is tested daily. The scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

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 1/30/2009.

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

Condition 9: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00202



Regulated Contaminant(s):

CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00202 is 0.045 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm on loss of flow and the scrubber solution normality is tested daily. The scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 10: Compliance Demonstration

Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(a)

Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 00235

Regulated Contaminant(s):

CAS No: 000107-13-1 PROPENENITRILE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The acrylonitrile (propenenitrile) emission limit for ep00235 is 0.045 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm and automatic process shutdown on low flow. The scrubber solution normality is also tested weekly, with the



scrubber solution changed at a normality of less than 0.6.
Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 11: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 00235

Regulated Contaminant(s):

CAS No: 007783-06-4

HYDROGEN SULFIDE

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00235 is 0.00029 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm and automatic process shutdown on low flow. The scrubber solution is also tested weekly. The scrubber solution is changed when the normality drops below 0.6. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.



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

Condition 12: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(a)

Item 12.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00240

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The ammonia emission limit for ep00240 is 0.64 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flow meter with an alarm for low flow and the scrubber solution ph is monitored continuously with additional acid added automatically to maintain the ph below 3.0. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: EPA DRAFT MET 206OR=

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 13: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00240

Regulated Contaminant(s):
CAS No: 007783-06-4 HYDROGEN SULFIDE



Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00240 is 0.035 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a pressure transmitter with an alarm on low pressure, the primary scrubber solution normality is tested at least every two hours of operation and the secondary scrubber is tested each shift. The primary scrubber solution is changed when the normality drops below 0.6, and the secondary scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 14: Compliance Demonstration

Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 00305

Regulated Contaminant(s):

CAS No: 007783-06-4

HYDROGEN SULFIDE

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00305 is 0.014 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a pressure transmitter with an alarm on low pressure, the primary scrubber solution is



tested at least every two hours of operation and the secondary scrubber solution is tested each shift. The primary scrubber solution is changed when the normality drops below 0.6, and the secondary scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 15: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 00403

Regulated Contaminant(s):

CAS No: 007783-06-4

HYDROGEN SULFIDE

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00403 is 0.0062 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm on loss of flow and the scrubber solution normality is tested daily. The primary scrubber solution is changed when the normality drops below 0.6, and the secondary scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 16: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00404

Regulated Contaminant(s):
CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00404 is 0.022 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flow switch with an alarm on loss of flow and the scrubber solution normality is tested daily. The scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

The discharge from former emission point 57917 scrubber (9-S-16) is tied into the emission point 00404 scrubber (4-S-6) inlet, using 4-S-6 as a secondary scrubber. Proper operation on 9-S-16 is an indicator of acceptable emissions. The scrubber solution recirculation line has a flow switch with an alarm on loss of flow, and the scrubber solution normality shall be tested before each TG batch. The scrubber solution shall be changed when the normality drops below 3.0. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED



Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00410

Regulated Contaminant(s):
CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep00410 is 0.0074 lb/hr. This emission rate is based on a maximum hydrogen sulfide concentration in the exhaust of 0.2 ppmv. Quarterly draeger detector tube measurements shall be taken to confirm this concentration. An abnormal concentration shall prompt corrective action, which shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 18: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10

Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 00416

Regulated Contaminant(s):



CAS No: 007783-06-4 HYDROGEN SULFIDE

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep000416 is 0.00036 lb/hr. His emission rate is based on a maximum hydrogen sulfide concentration in the exhaust of 0.2 ppmv. Quarterly draeger detector tube measurements shall be taken to confirm this concentration. An abnormal concentration shall prompt corrective action, which shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 19: Compliance Demonstration

Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 01006

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The particulate limit for ep01006 is 0.05 gr/dscf. Indoor air sampling measurements of total dust have been used to calculate emissions from this general exhaust vent to demonstrate compliance with this standard. Any observations of abnormal levels of dust will prompt corrective action which shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.



Reference Test Method: PART 60,APP A,MET 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 20: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.5(d)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS Emission Point: 01602

Regulated Contaminant(s):
CAS No: 007664-41-7 AMMONIA

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The ammonia emission limit for ep01602 is 20 lb/hr based on best available control technology. Nh3 emissions result from the hydrolysis of nitrile remaining in the process waste stream. This stream is used in the ep01602 scrubber as the scrubbing medium. Under normal product yields, nitrile losses result in ammonia emissions less than 20lb/hr, maximum. Any abnormal yields shall prompt corrective action, which shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: EPA DRAFT MET 206OR=
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 21: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 257-10



Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 01602

Regulated Contaminant(s):

CAS No: 007783-06-4

HYDROGEN SULFIDE

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hydrogen sulfide emission limit for ep01602 is 0.037 lb/hr. Proper operation of the scrubber is an indicator acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm on loss of flow and the scrubber solution normality is tested daily. The scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60,APP A,MET 15

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 22: Compliance Demonstration

Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.4(c)

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 2AB18

Regulated Contaminant(s):

CAS No: 0NY075-00-0

PARTICULATES

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:



The particulate limit for ep2ab18 is 0.05 gr/dscf. Indoor air sampling measurements of total dust have been used to calculate emissions from this general exhaust vent to demonstrate compliance with this standard. Any observations of abnormal levels of dust from the flaker operation will prompt corrective action which shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60, APP A, MET 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 23: Compliance Demonstration
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PROCS

Emission Point: 2AB23

Regulated Contaminant(s):

CAS No: 007647-01-0

HYDROGEN CHLORIDE

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The HCL emission limit for ep2ab23 is 0.14 lb/hr. Proper operation of the scrubber is an indicator of acceptable emissions. The scrubber solution recirculation line has a flowswitch with an alarm on loss of flow and the scrubber solution normality is tested daily. The scrubber solution is changed when the normality drops below 2.5. Any abnormal operation of the scrubber shall prompt corrective action and shall be logged. If requested by NYSDEC, a stack test shall be used to determine compliance.

Reference Test Method: PART 60, APP A, MET26

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ANNUALLY (CALENDAR)

New York State Department of Environmental Conservation

Permit ID: 8-4538-00003/00099

Facility DEC ID: 8453800003



Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

Subsequent reports are due every 12 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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 24: Contaminant List
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 24.1:

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

CAS No: 000108-10-1
Name: 2-PENTANONE, 4-METHYL

CAS No: 007664-41-7
Name: AMMONIA

CAS No: 007647-01-0
Name: HYDROGEN CHLORIDE

CAS No: 007783-06-4
Name: HYDROGEN SULFIDE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 000107-13-1
Name: PROPENENITRILE

CAS No: 0NY998-00-0
Name: VOC

Condition 25: Unavoidable noncompliance and violations
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-1.4

Item 25.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements,



he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) 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.

Condition 26: Emission Unit Definition
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 26.1:

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

Emission Unit: 1-BOILR

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO BOILERS THAT PROVIDE PROCESS AND HEATING STEAM TO THE FACILITY. UNIT E HAS A RATED HEAT INPUT OF 44.3 MMBTU/HR AND CAN FIRE NATURAL GAS. IT EXHAUSTS TO EMISSION POINT 00124. UNIT F HAS A RATED HEAT INPUT OF 33.5 MMBTU/HR, AND FIRES NATURAL GAS; IT EXHAUSTS TO EMISSION POINT 00126.

Building(s): 001

Item 26.2:

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



Emission Unit: 1-PROCS

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF ALL REGULATED EMISSION SOURCES ASSOCIATED WITH THE PRODUCTION AND STORAGE OF CHEMICALS AND RELATED ACTIVITIES. EMISSION SOURCES CONSIST OF RAW MATERIAL AND PRODUCT STORAGE TANKS, REACTORS, RECEIVERS, AND OTHER PROCESS VESSELS; AND AN OVEN ROOM DRYER. SOME EMISSIONS ARE CONTROLLED BY EMISSIONS SCRUBBER SYSTEMS, OTHER EMISSIONS ARE UNCONTROLLED. EMISSIONS MAY VENT THROUGH DIRECT PROCESS EXHAUSTS, THROUGH GENERAL VENTILATION EXHAUSTS, OR MAY BE FUGITIVE.

Building(s): 001
002
003
004
010
014
016
2AB
579
OUTSIDE

Condition 27: Air pollution prohibited
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 27.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 28.1:

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



Emission Unit: 1-BOILR

Emission Point: 00124

Height (ft.): 100

Diameter (in.): 72

NYTMN (km.): 4751.622

NYTME (km.): 348.63

Building: 001

Emission Point: 00126

Height (ft.): 47

Diameter (in.): 24

Building: 001

Item 28.2:

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

Emission Unit: 1-PROCS

Emission Point: 00125

Height (ft.): 42

Diameter (in.): 6

Building: 001

Emission Point: 00127

Height (ft.): 34

Diameter (in.): 6

Building: 001

Emission Point: 00202

Height (ft.): 45

Diameter (in.): 5

Building: 002

Emission Point: 00213

Height (ft.): 23

Diameter (in.): 2

Building: 002

Emission Point: 00214

Height (ft.): 30

Diameter (in.): 5

Building: 002

Emission Point: 00232

Height (ft.): 34

Diameter (in.): 2

Building: 002

Emission Point: 00233

Height (ft.): 34

Diameter (in.): 2

Building: 002

Emission Point: 00235

Height (ft.): 40

Diameter (in.): 2

Building: 002

Emission Point: 00236

Height (ft.): 2 Diameter (in.): 3

Building: 002

Emission Point: 00240

Height (ft.): 62

Diameter (in.): 6



			Building: 002
Emission Point: 00304	Height (ft.): 30	Diameter (in.): 4	
			Building: 003
Emission Point: 00305	Height (ft.): 52	Diameter (in.): 6	
			Building: 003
Emission Point: 00308	Height (ft.): 29	Diameter (in.): 2	
			Building: 003
Emission Point: 00311	Height (ft.): 1	Diameter (in.): 2	
			Building: 003
Emission Point: 00403	Height (ft.): 47	Diameter (in.): 8	
			Building: 004
Emission Point: 00404	Height (ft.): 42	Diameter (in.): 10	
			Building: 004
Emission Point: 00410	Height (ft.): 31	Diameter (in.): 31	
			Building: 004
Emission Point: 00416	Height (ft.): 31	Diameter (in.): 36	
			Building: 004
Emission Point: 01006	Height (ft.): 27	Diameter (in.): 12	
			Building: 010
Emission Point: 01401	Height (ft.): 26	Diameter (in.): 13	
			Building: 014
Emission Point: 01601	Height (ft.): 29	Diameter (in.): 4	
			Building: 016
Emission Point: 01602	Height (ft.): 35	Diameter (in.): 18	
			Building: 016
Emission Point: 2AB08	Height (ft.): 28	Length (in.): 48	Width (in.): 48
			Building: 2AB



Emission Point: 2AB18 Height (ft.): 27	Length (in.): 32	Width (in.): 32 Building: 2AB
Emission Point: 2AB23 Height (ft.): 28	Diameter (in.): 8	Building: 2AB
Emission Point: 57901 Height (ft.): 27	Diameter (in.): 2	Building: 579
Emission Point: 57902 Height (ft.): 26	Diameter (in.): 3	Building: 579
Emission Point: 57903 Height (ft.): 26	Diameter (in.): 2	Building: 579
Emission Point: 57917 Height (ft.): 32	Diameter (in.): 4	Building: 579
Emission Point: HT013 Height (ft.): 33	Diameter (in.): 3	Building: OUTSIDE
Emission Point: HT050 Height (ft.): 2	Diameter (in.): 3	Building: OUTSIDE
Emission Point: HT056 Height (ft.): 21	Diameter (in.): 3	Building: OUTSIDE
Emission Point: HT097 Height (ft.): 15	Diameter (in.): 4	Building: OUTSIDE
Emission Point: HT104 Height (ft.): 18	Diameter (in.): 3	Building: OUTSIDE
Emission Point: HT138 Height (ft.): 18	Diameter (in.): 4	Building: OUTSIDE

Condition 29: Process Definition By Emission Unit
Effective between the dates of 05/08/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5



Item 29.1:

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

Emission Unit: 1-BOILR

Process: GAS

Source Classification Code: 1-02-006-01

Process Description:

THIS PROCESS IS NATURAL GAS COMBUSTION IN A BOILER. THIS PROCESS APPLIES TO UNIT E, AND UNIT F. APPLICABLE REQUIREMENTS SPECIFIED FOR THIS PROCESS APPLY TO EACH BOILER INDIVIDUALLY. UNIT E IS RATED AT 44.3 MMBTU/H R. UNIT F IS RATED AT 33.5 MMBTU/HR.

Emission Source/Control: UNITE - Combustion

Design Capacity: 44.3 million Btu per hour

Emission Source/Control: UNITF - Combustion

Design Capacity: 33.5 million BTUs per hour

Item 29.2:

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

Emission Unit: 1-PROCS

Process: PR1

Source Classification Code: 3-99-999-93

Process Description:

THIS PROCESS IS THE PRODUCTION AND STORAGE OF CHEMICALS AND ASSOCIATED ACTIVITIES. THIS PROCESS ACCOUNTS FOR ALL PRODUCTION RELATED ACTIVITIES AT THE FACILITY.

Emission Source/Control: PSCRB - Control

Control Type: PACKED-GAS ABSORPTION SYSTEM

Emission Source/Control: VSCRB - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: OOVEN - Process

Emission Source/Control: TANKS - Process

Emission Source/Control: VESSL - Process

New York State Department of Environmental Conservation

Permit ID: 8-4538-00003/00099

Facility DEC ID: 8453800003

