

Facility DEC ID: 9291100111

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility

Permit ID: 9-2911-00111/00105

Effective Date:

Expiration Date:

Permit Issued To: DUREZ CORPORATION
4400 Haggerty Road
Commerce Township, MI 48390

Contact: Michael Kifer
5000 Packard Road
Niagara Falls, NY 14304
(716) 471-4809

Facility: DUREZ NIAGARA
5000 Packard Rd
Niagara Falls, NY 14304

Contact: Jill Himes
5000 Packard Road
Niagara Falls, NY 14304
(716) 713-9708

Description:

This is a renewal of the Title V air permit issued to Durez Niagara (Durez) under DEC ID: 9291100111. Durez is a manufacturer of phenolic resins which are mainly used as glues (bonding agents) or coatings to protect surfaces. The site consists of two main resin production buildings, a waste water treatment plant (that treats all sanitary water, storm water, and non-hazardous process waste water), two tank farms containing bulk storage for raw materials, finished product and hazardous/non-hazardous waste waters and a process waste water hazardous waste incinerator.

Emission sources operated by Durez include seven (7) resin production kettles, a hazardous waste incinerator, nine (9) dust collectors associated with the processing of resin solids, and chemical storage tanks. Durez is required to obtain a Title V permit under 40 CFR 63 Subpart EEE (Subpart EEE) as the facility operates a hazardous waste incinerator. The Durez incinerator is an aqueous liquid disposal system consisting of a 20 million BTU/hour enclosed flame thermal oxidizer and waste heat boiler. The feed to the incinerator consists primarily of water (77 to 98 percent) with phenol, formaldehyde, solvents and trace quantities of other organics. The facility incinerates process

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wastewater from the Durez Niagara facility and non-hazardous waste from the company's facilities in Fort Erie, Ontario, Canada and Kenton, Ohio, as authorized by the facility's Part 373 Hazardous Waste Permit.

Comprehensive performance tests (CPT) are conducted every five years to demonstrate that emissions from the hazardous waste incinerator are within the limits for hazardous air pollutants established in Subpart EEE. The facility is also required to conduct a confirmatory performance test every two and a half years to demonstrate compliance with the dioxin emission standard and to verify the calibration of the required monitoring equipment. Subpart EEE requires that the facility continuously monitor various operating parameters to demonstrate that the hazardous waste incinerator and associated equipment is operating as it was during the most recent CPT. Operating parameter limits were established during the CPT performed in December 2024. Limits may be reestablished during future performance testing. Incinerator operating limits include maximum combustion zone pressure, minimum temperature in the combustion chamber, a range for atomization air pressure, and feed stream limits.

Incinerator feed stream limits are established under Subpart EEE for chlorine, ash, mercury, lead, cadmium, beryllium, arsenic, chromium, and total mass. Durez follows a Feedstream Analysis Plan (FAP) to monitor the feed stream into the incinerator. The FAP was accepted by NYSDEC on April 2, 2025. Durez maintains ELAP certification to test for chlorine content on-site. Sampling for ash, mercury, lead, cadmium, beryllium, chromium, and arsenic content is contracted out to a third-party lab and is performed monthly. Durez adjusts the waste feed rate to the incinerator as necessary to ensure the feed rate of hazardous air pollutants regulated under Subpart EEE does not exceed the mass fed during the most recent CPT.

Emissions from the hazardous waste incinerator are controlled by a wet electrostatic precipitator (WESP). WESP operating parameters are continuously monitored to demonstrate ongoing compliance with the requirements of Subpart EEE, including the effluent gas flow rate, inlet gas temperature, spray water flow, volumetric flow rate of sump blow down, pH of water exiting the WESP and secondary power. Wastewater from the WESP is treated on-site before being discharged to the sewer.

The facility operates an automatic waste feed cutoff device (AWFCO) to immediately stop waste feed to the incinerator should the incinerator fall outside

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of the established operating envelope, as required under 40 CFR 63.1206(c)(3). The AWFCO is required to be tested weekly to ensure it is operating properly.

Durez operates seven (7) kettles for resin production. Kettles 1- 6 are ducted to a regenerative thermal oxidizer (RTO) to reduce odorous emissions from the resin production process as part of a previous environmental benefit project agreement with NYSDEC. The RTO is continuously monitored and required to operate at 1300 F during operation of the kettles. Kettle 7 is ducted through a passive condenser that reduces the amount of VOCs from the air stream before being exhausted into atmosphere.

Durez operates nine (9) dust collectors that are associated with various processes, all of which are subject to the particulate matter emission limit of 0.050 grains per cubic foot of exhaust gas, as established in 6 NYCRR Part 212-2.4(b). Daily visible emission evaluations shall be conducted for each dust collector. The pressure drop across each dust collector shall be checked on a weekly basis. The pressure drop for each dust collector shall be maintained within a range of 1-15 inches w.c. to ensure the dust collectors are operating properly.

Durez maintains a Part 373 permit for chemical storage tanks that store hazardous waste (RCRA tanks). RCRA tanks on-site are equipped with a carbon adsorption system to minimize the emission of organic pollutants and maintain emissions of high toxicity air contaminants (HTACs) below the mass emission limits established in 6 NYCRR Part 212-2.2. On a weekly basis, the facility operator shall conduct emission monitoring on the RCRA tank carbon system utilizing a H-Nu meter. A reading in excess of 100 ppm of organics against the background concentration shall indicate breakthrough in the primary carbon canister. If breakthrough is observed, the canisters shall be replaced in a timely manner to ensure breakthrough does not occur in the secondary carbon canister.

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: MICHELLE R WOZNICK
NYSDEC - REGION 9
700 DELAWARE AVE

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BUFFALO, NY 14209

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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DEC GENERAL CONDITIONS

**** General Provisions ****

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department**Applicable State Requirement: ECL 19-0305****Item 1.1:**

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations**Applicable State Requirement: ECL 3-0301 (2) (m)****Item 2.1:**

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

Condition 3: Applications for permit renewals, modifications and transfers**Applicable State Requirement: 6 NYCRR 621.11****Item 3.1:**

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before 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

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submitted prior to actual transfer of ownership.

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9
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 9 Headquarters
Division of Environmental Permits
700 Delaware Ave.,
Buffalo, NY 14209
(716) 851-7130

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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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4400 Haggerty Road
Commerce Township, MI 48390

Facility: DUREZ NIAGARA
5000 Packard Rd
Niagara Falls, NY 14304

Authorized Activity By Standard Industrial Classification Code:
2821 - PLASTICS MATERIALS AND RESINS
2869 - INDUSTRIAL ORGANIC CHEMICALS, NEC

Permit Effective Date:

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- 40 45 40CFR 63.1207(e), Subpart EEE: Compliance Certification
- 40 46 40CFR 63.1219(a), Subpart EEE: Compliance Certification
- Emission Unit Level**
- 41 47 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
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EU=U-INCIN

- 54 49 40CFR 63, Subpart A: MACT General Provisions - emission unit level
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- 67 63 40CFR 63.1209(k)(1), Subpart EEE: Compliance Certification
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- 68 65 40CFR 63.1209(m)(1)(iv), Subpart EEE: Compliance Certification
- 69 66 40CFR 63.1209(m)(1)(iv), Subpart EEE: Compliance Certification
- 70 67 40CFR 63.1209(m)(1)(iv), Subpart EEE: Compliance Certification
- 71 68 40CFR 63.1209(m)(3), Subpart EEE: Compliance Certification
- 72 69 40CFR 63.1209(n)(2)(ii), Subpart EEE: Compliance Certification
- 74 70 40CFR 63.1209(n)(2)(ii), Subpart EEE: Compliance Certification

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- 77 71 ECL 19-0301: Contaminant List
- 78 72 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 79 73 6 NYCRR 201-1.4: Compliance Demonstration
- 80 74 6 NYCRR 211.1: Air pollution prohibited

Emission Unit Level

EU=U-INCIN

- 80 75 6 NYCRR 212-2.2: Compliance Demonstration

EU=U-KETTL

- 81 76 6 NYCRR 211.1: Compliance Demonstration

EU=U-TANKS

- 82 77 6 NYCRR 212-2.2: Compliance Demonstration

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/DRAFT

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

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)

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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 2: Acceptable Ambient Air Quality
Effective for entire length of Permit****Applicable Federal Requirement: 6 NYCRR 200.6****Item 2.1:**

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

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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 3: Fees
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (a) (7)

Item 3.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 4: Recordkeeping and Reporting of Compliance Monitoring
Effective for entire length of Permit

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

Item 4.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

Condition 5: Records of Monitoring, Sampling, and Measurement
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)

Item 5.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all

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reports required by the permit.

**Condition 6: Compliance Certification
Effective for entire length of Permit**

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

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

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

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

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

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

**Condition 7: Compliance Certification
 Effective for entire length of Permit**

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

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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and

- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

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

iii. Compliance certifications shall be submitted annually. Certification reports are due 60 days after the anniversary date of four consecutive calendar quarters. The first report is due 60 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

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

Chief – Air Compliance Branch
USEPA Region 2 DECA/ACB
290 Broadway, 21st Floor
New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
NYSDEC Region 9 Headquarters
700 Delaware Ave.,
Buffalo, NY 14209

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway

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only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.

(g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.

(h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

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

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

**Condition 10: Maintenance of Equipment
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

**Condition 11: Recycling and Salvage
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.7

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Item 11.1:

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

**Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

**Condition 13: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit**

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

Item 13.1:

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

**Condition 14: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit**

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

Item 14.1:

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

**Condition 15: Requirement to Provide Information
Effective for entire length of Permit**

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

Item 15.1:

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

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may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: Right to Inspect
Effective for entire length of Permit

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

Item 16.1:

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

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Right to Inspect
Effective for entire length of Permit

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

Item 17.1:

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

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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Condition 18: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 202-1.1

Item 18.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 19: Accidental release provisions.
Effective for entire length of Permit

Applicable Federal Requirement: 40 CFR Part 68

Item 19.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 20: Recycling and Emissions Reduction
Effective for entire length of Permit

Applicable Federal Requirement: 40 CFR 82, Subpart F

Item 20.1:

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

The following conditions are subject to annual compliance certification

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requirements for Title V permits only.

**Condition 21: Emission Unit Definition
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 21.1:

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

Emission Unit: 0-UMISC

Emission Unit Description:

This emission unit consists of all miscellaneous facility emission sources including: a welding booth, belt flaker cooling fans, a liquid resin filter changing booth, resin cooling floor fans, pilot plant resin production equipment, and a boiler.

Building(s): M1
M3
MSBR
W6

Item 21.2:

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

Emission Unit: U-INCIN

Emission Unit Description:

This emission unit consists of a hazardous waste incinerator. The facility incinerates process wastewater from the Durez Niagara facility and non-hazardous waste from the company's facilities in Fort Erie, Ontario, Canada and Kenton, Ohio. Emission point FBH20 is the vent for the distillate feed to the incinerator.

Building(s): BR

Item 21.3:

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

Emission Unit: U-KETTL

Emission Unit Description:

This emission unit includes all facility production kettles and their associated condensers, vacuum pumps, receivers, and agitators. The vacuum pumps associated with kettles #1-#6 vent to a regenerative thermal oxidizer (RTO) during normal operation, but a bypass is present for periods of malfunction. The bypass will only be used when a kettle has been charged and the regenerative thermal oxidizer is malfunctioning. Kettle 7 is ducted through a passive condenser that reduces the amount of VOCs from the air stream before being exhausted into atmosphere.

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Building(s): M3
M7
W2A

Item 21.4:

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

Emission Unit: U-SOLID

Emission Unit Description:

This emission unit includes all facility solid material handling units, dust collectors and ribbon mixers at resin grinding and drumming operations.

Building(s): M3
M4
M5
M6
M7
W1
W6

Item 21.5:

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

Emission Unit: U-TANKS

Emission Unit Description:

This emission unit consists of all facility process tanks including: storage tanks, weigh tanks, filter tanks, drums, and tank wagons.

Building(s): -
M3
M7
W6

**Condition 1: Progress Reports Due Semiannually
Effective for entire length of Permit**

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

Item 1.1:

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

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 22: Operational Flexibility
Effective for entire length of Permit**

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Applicable Federal Requirement:6 NYCRR 201-6.4 (f)**Item 22.1:**

A permit modification is not required for changes that are provided for in the permit. Such changes include approved alternate operating scenarios and changes that have been submitted and approved pursuant to an established operational flexibility protocol and the requirements of this section. Each such change cannot be a modification under any provision of Title I of the Clean Air Act or exceed, or cause the facility to exceed, an emissions cap or limitation in the permit. The facility owner or operator must incorporate all changes into any compliance certifications, record keeping, and/or reporting required by the permit.

**Condition 23: Compliance Certification
Effective for entire length of Permit****Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (2)****Item 23.1:**

The Compliance Certification activity will be performed for the Facility.

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to maintain operational flexibility, Durez has requested the ability to change their chemical bulk storage based on production demand and market forces. Such changes may include storing reagents in drums, totes, or bulk tanks as the facility's production needs change. Durez must comply with all applicable bulk storage requirements established in 6 NYCRR Part 598 and 6 NYCRR Part 613.

This condition authorizes Durez to change the type and/or quantity of materials stored in the facility's bulk storage tanks, drums, totes, and weigh tanks (U-TANKS) provided that:

1. The change does not cause the facility to exceed an applicable emission standard or threshold in an applicable requirement or this permit;
2. The change does not cause the facility to become subject to a new applicable requirement; and
3. The change is not a modification as defined in Title I of the Clean Air Act.

Durez shall evaluate each change made pursuant to this

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protocol for compliance with the conditions stated above. A record of each such change must be made and must be maintained at the facility for a period of at least five years. Records kept pursuant to this condition must contain the following information at a minimum:

1. The date of each change;
2. The material(s) to be stored (including CAS number and chemical name) and the location where they will be stored (e.g. emission source ID, tank number, etc.);
3. The amount that will be stored, including an estimate of the emissions that will result from working/breathing losses associated with storage and use; and
4. A copy of any additional information or data used to demonstrate compliance with this protocol.

The Department may require a permit modification for any change made pursuant to this protocol that the Department determines, in its sole discretion, does not meet the criteria described above.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 24: Non Applicable requirements
Effective for entire length of Permit**

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

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6 NYCRR Part 219

Reason: This facility is not subject to 6 NYCRR Part 219 because it does not apply to hazardous waste incinerators.

40 CFR Part 60, Subpart Kb

Reason: 40 CFR 60 Subpart Kb applies to certain bulk storage tanks with capacities greater than 75 cubic meters installed after July 23, 1984. This facility includes three tanks that are potentially subject to 40 CFR 60 Subpart Kb. Those tanks are:

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Tanks 32 and 65, storing phenol (vapor pressure 0.848 kPa), installed in August 1986; and

Tank 61, storing formalin (vapor pressure 2.93 kPa), installed in August 1986.

Each tank has a volume less than 39,900 gallons (151 cubic meters), and is storing a liquid with a maximum true vapor pressure less than 15 kilopascals. As a result, 40 CFR 60 Subpart Kb does not apply to these tanks as described in 40 CFR 60.110b(b).

40 CFR Part 63, Subpart OOO

Reason: Durez Niagara has submitted a series of emissions calculations to the Department demonstrating that the facility was not a major facility at any point since the promulgation of 40 CFR 63 Subpart OOO. The Department has reviewed these calculations in detail, and agrees with their results. Accordingly, 40 CFR 63 Subpart OOO does not apply to their resin production operations as described in Section 63.1400(a) because Durez Niagara is not a major source as defined in 40 CFR 63.2

40 CFR Part 64

Reason: Durez Niagara has supplied the Department with a series of emissions calculations that demonstrate that the facility's emissions do not exceed the major facility thresholds. Accordingly, the facility is not subject to the Compliance Assurance Monitoring requirements of 40 CFR 64.

**Condition 25: Statement dates for emissions statements.
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR 202-2.4 (a) (3)

Item 25.1:

This facility is required to submit an annual emission statement electronically and these emissions statements must be submitted to the department as per the following schedule:

- (i) March 15th of each year for facilities with three or fewer processes listed in their Title V permit:
- (ii) March 31st of each year for facilities with four to six processes listed in their Title V permit:
- (iii) April 15th of each year for facilities with 7 to 12 processes listed in their Title V permit:
- (iv) April 30th of each year for facilities with 13 or more processes listed in their Title V permit.

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Condition 26: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 211.2

Item 26.1:

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 27: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212-1.6

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This facility is subject to the opacity limitations of 6 NYCRR Part 212-1.6(a) and shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except only the emission of uncombined water. The New York State Department of Environmental Conservation (NYSDEC) reserves the right to perform or require the performance of an EPA Method 9 opacity evaluation at any time during facility operation.

The facility shall conduct periodic visual observations of all of its emission points, at a minimum of once a month while the processes are in operation. Normal operation of these processes should not result in visible emissions. If visible emissions (other than condensing moisture or steam) are observed, the facility shall investigate and make any necessary corrections in a timely manner. After corrective actions are complete, an additional visual observation of the emission point shall be made the following calendar day to see if visible emissions are still occurring. If visible emissions (other than condensing moisture or steam) are observed for 2

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consecutive calendar days, a Method 9 test shall be conducted within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity. The facility shall notify NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site and include the date, time, observer's name, weather conditions and a description of the observations (steam, visible emissions, etc.). These records shall be kept on site for a period of 5 years from the date of the last entry. Should NYSDEC determine that the record keeping format is inadequate to demonstrate compliance, it shall provide written notice stating the inadequacies, the facility shall have 90 days to revise its prospective record keeping format in a manner acceptable to NYSDEC.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9

Monitoring Frequency: MONTHLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 28: Compliance Certification
Effective for entire length of Permit

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

Item 28.1:

The Compliance Certification activity will be performed for the Facility.

Item 28.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This facility operates nine (9) dust collectors, all of which are subject to the particulate matter emission limit of 0.050 grains per cubic foot of exhaust gas, as established in 6 NYCRR Part 212-2.4(b).

The facility owner or operator shall conduct daily visible emissions evaluations of each dust collector and shall monitor the pressure drop across each dust collector on a weekly basis. Pressure drop for each dust collector shall

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be maintained within a range of 1-15 inches w.c..

The facility owner or operator shall compile a record of each observation made in accordance with this condition. Such records shall include the following information at a minimum: the date of each observation, the visible emissions and/or pressure drop observed, and a description of any corrective action taken.

Records must be maintained on site for a period of at least five years and be made available to NYSDEC upon request.

NYSDEC reserves the right to require emission testing to demonstrate compliance with this condition.

Parameter Monitored: PRESSURE DROP
 Lower Permit Limit: 1 inches of water
 Upper Permit Limit: 15 inches of water
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED RANGE AT ANY TIME
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 226-1.3

Item 29.1:
 The Compliance Certification activity will be performed for the Facility.

Item 29.2:
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

- Owners or operators conducting solvent cleaning processes must:
- (a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;
 - (b) maintain equipment to minimize leaks and fugitive emissions;
 - (c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
 - (d) keep the degreaser cover closed except when parts are

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being placed into or being removed from the degreaser, the cover needs to be open in order to remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning parts in a cold cleaning degreaser;

(e) create and maintain a record of solvent consumption for five years. This record must be retained for five years and made available to the department upon request;

(f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and

(g) if using a cold cleaning degreaser that is subject to paragraph 6 NYCRR 226-1.4(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, bill of sale, a certificate covering multiple sales, manufacturers published information, or other appropriate documentation acceptable to the Department may be used to comply with this requirement:

- (1) name and address of the solvent supplier;
- (2) the type of solvent including the product or vendor identification number; and
- (3) the VOC content of the cleaning solution in grams per liter (gm/l) to verify compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 30: Applicability of General Provisions of 40 CFR 61 Subpart A Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 61, NESHAP Subpart A

Item 30.1: This emission source is subject to the applicable General Provisions of 40 CFR 61. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

Condition 31: Compliance Certification Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 61, NESHAP Subpart FF

Item 31.1:
The Compliance Certification activity will be performed for the Facility.

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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Monitoring Description:

The facility owner or operator must submit an updated summary of compliance status whenever a change in facility operations causes, or has the potential to cause, an increase in the amount of benzene contained in the wastes, products, byproducts, or intermediates processed at the facility to 1.1 tons per year or more. Such a report must be submitted within 30 days of the change(s) it describes, and shall contain the information described in 40 CFR 61.357(a) at a minimum.

The facility owner or operator shall periodically measure and record the benzene concentration of the combined process waste streams in each incinerator feed tank (T-80, T-81, and T-82) prior to firing in the incinerator. Such measurements shall be added to any other benzene containing materials processed at the facility in order to determine the annual benzene quantity.

In addition to the measurement and reporting requirements above, the facility owner or operator must maintain the following records:

1. An identification of each waste stream and whether or not it is a process wastewater stream;
2. A record of all test results, measurements, and calculations used to determine:
 - a. The water content of each waste stream;
 - b. The annual quantity of waste processed;
 - c. The range of benzene concentrations in each waste stream;
 - d. The annual flow-weighted benzene concentration; and
 - e. The annual benzene quantity processed at the facility.

Records compiled pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to the Department upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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Condition 32: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1206(c), Subpart EEE

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period, the facility must:

(1) Within 45 days of the 10th exceedance, complete an investigation of the cause of each exceedance and evaluation of approaches to minimize the frequency, duration, and severity of each exceedance, and revise the start up, shutdown, and malfunction plan as warranted by the evaluation to minimize the frequency, duration, and severity of each exceedance;

(2) Record the results of the investigation and evaluation in the operating record, and include a summary of the investigation and evaluation, and any changes to the start up, shutdown, and malfunction plan, in the excess emissions report required under § 63.10(e)(3); and

(3) Submit a report to NYSDEC for each set of 10 exceedances of an emission standard or operating requirement while hazardous waste remains in the combustion chamber (i.e., when the hazardous waste residence time has not transpired since the hazardous waste feed was cutoff) during a 60-day block period. Each written report must be submitted within 5 calendar days of the 10th exceedance during any 60-day block period, and must document the exceedances, results of the investigation into their cause, and any corrective measures taken.

On a case-by-case basis, NYSDEC may require excessive exceedance reporting when fewer than 10 exceedances occur

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during a 60-day block period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 5 days after the reporting period.

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

Condition 33: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1207(b)(1), Subpart EEE

Item 33.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007439-97-6 MERCURY

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the mercury emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 130 micrograms per dry standard
cubic meter (corrected to 7% oxygen)

Reference Test Method: EPA Reference Test Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 34: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1207(b)(1), Subpart EEE

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

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Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007440-41-7	BERYLLIUM
CAS No: 007440-47-3	CHROMIUM
CAS No: 007440-38-2	ARSENIC

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the combined arsenic, beryllium and chromium emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 92 micrograms per dry standard cubic meter (corrected to 7% oxygen)

Reference Test Method: EPA Reference Test Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 35: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1207(b)(1), Subpart EEE

Item 35.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the

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particulate matter emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 0.013 grains per dry standard cubic foot (corrected to 7% O₂)

Reference Test Method: EPA Reference Test Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 36: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1207(b)(1), Subpart EEE

Item 36.1:

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

Emission Unit: U-INCIN

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility owner or operator must conduct comprehensive performance testing to periodically verify compliance with the hydrocarbon (expressed as propane) emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

If a destruction and removal efficiency (DRE) test performed pursuant to 40 CFR 63.1207(c)(2) is acceptable as documentation of compliance with the DRE standard, the facility owner or operator may use the highest hourly rolling average hydrocarbon level achieved during the DRE test runs to document compliance with the hydrocarbon standard. An acceptable DRE test is any test for which the data and results were collected pursuant to a Department approved testing protocol and are determined by the Department to meet quality assurance objectives such that the results adequately demonstrate compliance with the DRE standard.

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If the facility owner or operator did not obtain hydrocarbon emissions data during the acceptable DRE test sufficient to document compliance with the hydrocarbon emission standard, the facility owner or operator must either:

(1) Conduct, as part of the comprehensive performance test, an equivalent DRE test as described in 40 CFR 63.1206(b)(6)(ii)(A); or

(2) Perform a DRE test as part of the comprehensive performance test.

Parameter Monitored: CONCENTRATION

Upper Permit Limit: 10 parts per million by volume (dry, corrected to 7% O₂)

Reference Test Method: EPA Reference Test Method

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 37: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1207(b)(1), Subpart EEE

Item 37.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the dioxin and furan emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 0.40 nanogram toxicity equivalence

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per dry standard cu meter, corrected
to 7% O2

Reference Test Method: EPA Reference Test Method 0023A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 38: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1207(b)(1), Subpart EEE

Item 38.1:

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

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007439-92-1	LEAD
CAS No: 007440-43-9	CADMIUM

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the combined cadmium and lead emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 230 micrograms per dry standard
cubic meter (corrected to 7% oxygen)

Reference Test Method: EPA Reference Test Method 29

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 39: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1207(b)(1), Subpart EEE

Item 39.1:

Permit ID: 9-2911-00111/00105

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

Emission Unit: U-INCIN

Regulated Contaminant(s):
 CAS No: 000630-08-0 CARBON MONOXIDE

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the carbon monoxide emission limit contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 100 parts per million by volume
 (dry, corrected to 7% O₂)

Reference Test Method: EPA Reference Test Method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 40: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1207(b)(1), Subpart EEE

Item 40.1:

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

Emission Unit: U-INCIN

Regulated Contaminant(s):
 CAS No: 000108-90-7 CHLOROBENZENE
 CAS No: 000108-95-2 PHENOL

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Compliance with the required destruction and removal efficiency (DRE) of 99.99% for each principle organic

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hazardous constituent (POHC) must be demonstrated during the comprehensive performance test. The POHCs for this facility are phenol and chlorobenzene. The DRE for each POHC must be calculated using the following formula:

$$\text{DRE} = [1 - (\text{Wout} / \text{Win})] \times 100\%$$

Where:

Win = mass feed rate of one POHC in a waste feed stream;
and

Wout = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere.

Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

The facility owner or operator must document compliance with the DRE standard only once provided that the incinerator is not modified after the DRE test in a manner that could affect its ability to meet the DRE standard, as determined by the NYSDEC. Compliance with the DRE requirement was demonstrated during the 2014 Comprehensive Performance Test. The facility owner or operator may use any DRE test data that demonstrates that the facility meets the required level of DRE provided:

(1) The design or operation of the incinerator has not been modified in a manner that could affect its ability to meet the DRE standard since the DRE test was performed;
and

(2) The DRE test data meets quality assurance objectives and was collected pursuant to a Department approved testing protocol.

Lower Permit Limit: 99.99 percent

Reference Test Method: SW 846 Method 0010

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 41: Compliance Certification
Effective for entire length of Permit

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Applicable Federal Requirement:40CFR 63.1207(b)(1), Subpart EEE

Item 41.1:

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

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE
CAS No: 007647-01-0 HYDROGEN CHLORIDE

Item 41.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct comprehensive performance testing to periodically verify compliance with the total chlorine (combined hydrogen chloride and chlorine gas) emission limit, expressed as a chloride (Cl(-)) equivalent, contained in 40 CFR 63.1219. Comprehensive performance testing must be conducted no later than 61 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 32 parts per million by volume (dry,
corrected to 7% O₂)

Reference Test Method: EPA Reference Test Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 42: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1207(b)(2), Subpart EEE

Item 42.1:

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

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 001746-01-6 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

Item 42.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility must conduct confirmatory performance testing to periodically verify compliance with the dioxin/furan emission limit contained in 40 CFR 63.1219. Confirmatory performance testing must be conducted no later than 31 months from the date of the previous comprehensive performance test, and in accordance with a testing protocol approved by the Department.

Upper Permit Limit: 0.40 nanogram toxicity equivalence per dry standard cu meter, corrected to 7% O₂

Reference Test Method: EPA Reference Test Method 0023A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 43: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1207(e), Subpart EEE

Item 43.1:

The Compliance Certification activity will be performed for the Facility.

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per 40 CFR 63.1207(e)(2), the facility owner or operator must make each site-specific test plan and continuous monitoring system (CMS) performance evaluation test plan available to the public for review no later than 60 calendar days before the initiation of the test. Such a notice must meet the criteria of 40 CFR 63.1207(e)(2) at a minimum. A public notice shall be issued to all persons on the facility/public mailing list (developed pursuant to 40 CFR 70.7(h), 71.11(d)(3)(i)(E) and 124.10(c)(1)(ix)) announcing the availability of the test plans and the location where the test plans are available for review. The test plans must be accessible to the public for 60 calendar days, beginning on the date that public notice is issued. The location must be unrestricted and provide access to the public during reasonable hours and provide a means for the public to obtain copies. The notification must include the following information at a minimum:

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- (i) The name and telephone number of the source's contact person;
- (ii) The name and telephone number of the regulatory agency's contact person;
- (iii) The location where the test plans and any necessary supporting documentation can be reviewed and copied;
- (iv) The time period for which the test plans will be available for public review; and
- (v) An expected time period for commencement and completion of the performance test and CMS performance evaluation test.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 44: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1207(e), Subpart EEE

Item 44.1:

The Compliance Certification activity will be performed for the Facility.

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per 40 CFR 63.1207(e)(1)(ii), the facility owner or operator must notify NYSDEC of the intention to conduct a confirmatory performance test and continuous monitoring system (CMS) performance evaluation 60 days prior to the date of the performance test and performance evaluation are scheduled to begin. Such a notification shall include a site-specific test plan and CMS performance evaluation test plan that meets the criteria of 40 CFR 63 Subpart EEE at a minimum. The facility owner or operator must submit a notification of the intention to conduct the comprehensive performance test at least 60 days before the test is scheduled to begin. Test plans must be approved by NYSDEC before testing commences.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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Condition 45: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1207(e), Subpart EEE

Item 45.1:

The Compliance Certification activity will be performed for the Facility.

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per 40 CFR 63.1207(e)(1)(i), the facility owner or operator must notify NYSDEC of the intention to conduct a comprehensive performance test (CPT) and continuous monitoring system (CMS) performance evaluation one year prior to the date of the performance test and performance evaluation are scheduled to begin. Such a notification shall include a site-specific test plan and CMS performance evaluation test plan that meets the criteria of 40 CFR 63 Subpart EEE at a minimum. Test plans must be approved by NYSDEC before testing commences.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

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

Condition 46: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1219(a), Subpart EEE

Item 46.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-INCN

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously monitor the carbon monoxide concentration of the incinerator flue gas to demonstrate compliance with the emission limit established

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in 40 CFR 63.1219(a)(2). In addition, the facility must operate a monitoring system for oxygen and use the recorded values to continuously correct the measured carbon monoxide concentration to 7% oxygen. Data from the continuous monitoring system shall be sent to the automatic waste feed cutoff, and feed to the incinerator shall be immediately terminated if the carbon monoxide concentration exceeds the upper limit based on a 1-hour average rolled each minute.

Carbon monoxide averages must be calculated as described in 40 CFR 63 Subpart 1209(a). The oxygen and carbon monoxide CEMS must be installed, calibrated, maintained, and continuously operated as described in Performance Specification 4B in 40 CFR 60 Appendix B. Deviations must be reported in the semiannual compliance report.

Manufacturer Name/Model Number: Thermo Scientific TEI 48iQ Dual Range or equivalent

Upper Permit Limit: 100 parts per million by volume
(dry, corrected to 7% O₂)

Reference Test Method: EPA Reference Method 10

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Condition 47: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 47.1:

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

Emission Unit: 0-UMISC

Emission Point: 0B011

Height (ft.): 30	Diameter (in.): 24	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: MSBR

Emission Point: 0FL02

Height (ft.): 23	Diameter (in.): 14	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: W6

Emission Point: 0FL03

Height (ft.): 42	Length (in.): 10	Width (in.): 14	Removal Date: 05/07/2021
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NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: W6
Emission Point: 0MS21		
Height (ft.): 16	Diameter (in.): 24	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: MSBR
Emission Point: 0PB08		
Height (ft.): 40	Diameter (in.): 6	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0VF01		
Height (ft.): 10	Length (in.): 36	Width (in.): 72
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0WH40		
Height (ft.): 25	Diameter (in.): 7	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M1
Emission Point: FFR04		
Height (ft.): 20	Diameter (in.): 10	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: MPB30		
Height (ft.): 55	Diameter (in.): 32	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	
Emission Point: TM103		
Height (ft.): 21	Diameter (in.): 2	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M1

Item 47.2:

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

Emission Unit: U-INCIN		
Emission Point: 0IN01		
Height (ft.): 55	Diameter (in.): 16	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: BR
Emission Point: FBH20		
Height (ft.): 70	Diameter (in.): 10	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: BR

Item 47.3:

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

Emission Unit: U-KETTL		
Emission Point: 0LR21		
Height (ft.): 52	Diameter (in.): 13	
NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M7

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Emission Point: 0LR22	Height (ft.): 58	Diameter (in.): 16	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M7
Emission Point: 0LR25	Height (ft.): 20	Diameter (in.): 3	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M7
Emission Point: 0LR26	Height (ft.): 50	Diameter (in.): 7	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M7
Emission Point: 0PB07	Height (ft.): 42	Diameter (in.): 6	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB22	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB24	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB25	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB26	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB27	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB29	Height (ft.): 52	Diameter (in.): 8	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0PB30	Height (ft.): 55	Diameter (in.): 32	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: W2A
Emission Point: 0PR30	Height (ft.): 43	Diameter (in.): 16	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3
Emission Point: 0V315	Height (ft.): 9	Diameter (in.): 3	
	NYTMN (km.): 4779.7	NYTME (km.): 174.3	Building: M3

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Point: 0V316
 Height (ft.): 9 Diameter (in.): 3
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M3

Emission Point: PB-30
 Height (ft.): 55 Diameter (in.): 32
 NYTMN (km.): 4779.82 NYTME (km.): 174.229 Building: W2-A

Item 47.4:

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

Emission Unit: U-SOLID

Emission Point: 0FL01
 Height (ft.): 21 Diameter (in.): 14
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: W6

Emission Point: 0WH51
 Height (ft.): 71 Diameter (in.): 14
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M7

Emission Point: 0WH53
 Height (ft.): 46 Diameter (in.): 14
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M5

Emission Point: 0WH55
 Height (ft.): 20 Diameter (in.): 3
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M5

Emission Point: 0WH60
 Height (ft.): 28 Length (in.): 10 Width (in.): 10
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M6

Emission Point: 0WH61
 Height (ft.): 33 Length (in.): 8 Width (in.): 8
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M3

Emission Point: DC801
 Height (ft.): 9 Length (in.): 34 Width (in.): 29
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M7

Emission Point: DM604
 Height (ft.): 40 Diameter (in.): 4
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M6

Emission Point: DM605
 Height (ft.): 40 Diameter (in.): 4
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M6

Item 47.5:

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

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Unit: U-TANKS

Emission Point: OST71

Height (ft.): 19 Diameter (in.): 2
 NYTMN (km.): 4779.7 NYTME (km.): 174.3

Emission Point: OST73

Height (ft.): 19 Diameter (in.): 2
 NYTMN (km.): 4779.7 NYTME (km.): 174.3

Emission Point: FM322

Height (ft.): 57 Length (in.): 24 Width (in.): 24
 NYTMN (km.): 4779.7 NYTME (km.): 174.3 Building: M3

Emission Point: RCRAV

Height (ft.): 9 Diameter (in.): 3
 NYTMN (km.): 4779.7 NYTME (km.): 174.3

**Condition 48: Process Definition By Emission Unit
 Effective for entire length of Permit**

Applicable Federal Requirement: 6 NYCRR Subpart 201-6

Item 48.1:

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

Emission Unit: 0-UMISC

Process: 004

Source Classification Code: 3-01-018-05

Process Description:

All miscellaneous facility sources involved in the production of phenolic resins. Includes a welding booth, belt flaker, cooling fans, a liquid resin filter changing booth fan, resin cooling floor ventilation fans, pilot plant resin production equipment, and a boiler. Phenol emissions from the flaker belt are ducted to the regenerative thermal oxidizer through an old wet scrubber that has been removed from service but not physically removed from the system.

Emission Source/Control: 0B011 - Combustion

Emission Source/Control: 0FL02 - Process

Emission Source/Control: 0FL03 - Process

Emission Source/Control: 0MS21 - Process

Emission Source/Control: 0PB08 - Process

Emission Source/Control: 0VF01 - Process

Emission Source/Control: 0WH40 - Process

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: FFR04 - Process

Emission Source/Control: TM103 - Process

Item 48.2:

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

Emission Unit: U-INCIN
 Process: 005 Source Classification Code: 3-01-018-05
 Process Description:
 This process includes the incineration of the facility's process wastewater in a hazardous waste incinerator.

Emission Source/Control: 0IN02 - Control
 Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 0IN01 - Incinerator
 Waste Feed Method: LIQUID FEED WITH A SPRAY NOZZLE
 Waste Type: HAZARDOUS WASTE

Emission Source/Control: FB205 - Process

Item 48.3:

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

Emission Unit: U-KETTL
 Process: 006 Source Classification Code: 3-01-018-05
 Process Description:
 Kettle 1 (0PB22) and Kettle 4 (0PB26). These kettles are used only to make liquids (there is no drop floor available). Steam is used as the heat source on the reactor jacket. Phenolic compounds, formaldehyde, and a catalyst (e.g. caustic, ammonium hydroxide) are added to the reactor to make a phenolic resin. Water or a solvent (i.e. methanol, ethanol, butanol, acetone, etc.) are added to make a liquid. The resin is filtered (PB-08) and then sent to a resin storage tank (ST-74, 77, 78), or placed in drums or totes.

When acetone is used as the solvent, acetone vapors are collected and fed to a refrigerated condenser (RF-M301) to be recovered for reuse.

Emission Source/Control: 0PB22 - Process

Emission Source/Control: 0PB26 - Process

Item 48.4:

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

Emission Unit: U-KETTL

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Process: 007

Source Classification Code: 3-01-018-05

Process Description:

Kettle 2 (0PB24) and Kettle 3 (0PB25). These kettles are typically used for solids, but they can also be used for liquids. Steam is used as the heat source on the reactor jacket. Phenol, bis-phenol A, or para tertiary butyl phenol and formaldehyde with a catalyst (i.e. caustic, ammonium hydroxide) are added to the reactor to make a phenolic resin. For solid phenolic resin, the resin is placed on the cooling floor (0VF01). Kettle 2 and Kettle 3 are also used to produce phenolic resin that uses toluene as a solvent to thin the viscosity during the reaction and processing steps

Emission Source/Control: 0PB24 - Process

Emission Source/Control: 0PB25 - Process

Item 48.5:

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

Emission Unit: U-KETTL

Process: 008

Source Classification Code: 3-01-018-05

Process Description:

Kettle 5 (0PB27). This kettle is not used to produce liquid resins. Hot oil is used as a heat source on the reactor jacket. Phenol, formaldehyde, and a catalyst (i.e. sulfuric acid, oxalic acid) are added to the reactor to make phenolic resin. The phenolic resin material is sent to a holding tank, the belt flaker, or to the cooling floor.

Emission Source/Control: 0PB27 - Process

Design Capacity: 2,800 gallons

Emission Source/Control: 0V315 - Process

Design Capacity: 300 gallons

Item 48.6:

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

Emission Unit: U-KETTL

Process: 009

Source Classification Code: 3-01-018-05

Process Description:

Kettle 6 (0PB29). This kettle is used to produce liquid resins and cannot be put to the cooling floor. Steam is used as a heat source on the reactor jacket. Phenol, formaldehyde, and a catalyst (i.e. sulfuric acid, oxalic acid) are added to the reactor to make phenolic resin. The liquid phenolic resin material is sent to a storage tank or transport tanker.

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: 0PB29 - Process
 Design Capacity: 7,800 gallons

Item 48.7:

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

Emission Unit: U-KETTL
 Process: 010 Source Classification Code: 3-01-018-05
 Process Description:

Kettle 7 (0LR21, 0LR22, 0LR25, and 0LR26). This kettle is used only to produce liquids. There is no drop floor available. Kettle 7 is the only kettle to use allyl chloride. Steam is used as the heat source on the reactor jacket. Phenol, formaldehyde, and a catalyst (i.e. caustic, ammonium hydroxide) are added to the reactor to make a phenolic resin. Water or a solvent (i.e. methanol, ethanol, butanol, etc.) are added to make a liquid. The resin is filtered and then sent to a resin storage tank (ST-74, 77, 78), or placed in drums.

Emission Source/Control: 0LR21 - Process
 Design Capacity: 6,850 gallons

Emission Source/Control: 0LR22 - Process
 Design Capacity: 55 gallons

Emission Source/Control: 0LR25 - Process

Emission Source/Control: 0LR26 - Process

Emission Source/Control: TM701 - Process
 Design Capacity: 4,512 gallons

Emission Source/Control: TM702 - Process

Item 48.8:

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

Emission Unit: U-KETTL
 Process: 011 Source Classification Code: 3-01-018-05
 Process Description:

Vacuum pumps for kettles 1 through 6. These pumps are tied to the regenerative thermal oxidizer.

Emission Source/Control: 0PB30 - Control
 Control Type: THERMAL OXIDATION

Emission Source/Control: 0PB07 - Process

Emission Source/Control: 0PR30 - Process
 Design Capacity: 55 gallons

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Item 48.9:

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

Emission Unit: U-SOLID

Process: 003

Source Classification Code: 3-01-018-05

Process Description:

Flaker drumming with dust collector.

Molten phenolic resin is cooled on a stainless steel conveyor belt. This thin sheet of phenolic resin is broken up into flakes by a rotating crusher. The flakes are conveyed by a bucket elevator to a hopper that fills drums or super sacks. The flaker dust collector pulls any nuisance dust created by the breaking of the brittle phenolic resin or when drumming or filling super sacks.

Emission Source/Control: DCF01 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: 0FL01 - Process

Item 48.10:

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

Emission Unit: U-SOLID

Process: 013

Source Classification Code: 3-01-018-05

Process Description:

#3 crusher with dust collector. Brittle phenolic resin is reduced in size by a crusher and placed in a hopper where the material is either drummed off or placed in bags as final product. Nuisance dust is pulled into the dust collector at the crusher and packaging areas.

Emission Source/Control: DC502 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: 0WH53 - Process

Item 48.11:

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

Emission Unit: U-SOLID

Process: 014

Source Classification Code: 3-01-018-05

Process Description:

Resin drumming with dust collector. The powdered material from the mixer in process 012 is conveyed to a drum filling station, super sack filler, or bag filling station where a dust collector pulls any nuisance dust while packaging the final product.

Emission Source/Control: DC303 - Control

Control Type: DUST COLLECTOR

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: 0WH60 - Process

Item 48.12:

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

Emission Unit: U-SOLID

Process: 015

Source Classification Code: 3-01-018-05

Process Description:

This process consists of vacuum resin transport operations.

Emission Source/Control: DC601 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: DM604 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: DM605 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: 0WH51 - Process

Item 48.13:

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

Emission Unit: U-SOLID

Process: 12A

Source Classification Code: 3-01-018-05

Process Description:

#5 grinder crusher with dust collector. Drums or super sacks of phenolic resin are put through a crusher to break up the resin before pulverizing it into a powder. Nuisance dust is pulled into the dust collector.

Emission Source/Control: DC603 - Control

Control Type: DUST COLLECTOR

Emission Source/Control: 0WH61 - Process

Item 48.14:

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

Emission Unit: U-SOLID

Process: 12B

Source Classification Code: 3-01-018-05

Process Description:

#5 Grinder with dust collector. The crushed resin from process 12A is passed through a grinder which pulverizes the crushed resin into a powder. The powder is pneumatically conveyed to a product dust collector and then sent to one of two mixers. The mixers have bin vents on them to collect any nuisance dust.

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: DC601 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: DM604 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: DM605 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: 0WH51 - Process

Item 48.15:

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

Emission Unit: U-SOLID
Process: 16A Source Classification Code: 3-01-018-05
Process Description:

Vacuum system with dust collector. Dust collector vacuum system is used for housekeeping in the solids crushing and grinding area. Dust collected is weighed and reused.

Emission Source/Control: DC503 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: 00VAC - Process

Item 48.16:

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

Emission Unit: U-SOLID
Process: 17A Source Classification Code: 3-01-018-05
Process Description:

Solid raw material is air-conveyed by a system in the storage warehouse to M7 Building for use in Kettle 7. Any generated dust is controlled with dust collector. Dust collected is weighed and used in production.

Emission Source/Control: DC801 - Control
Control Type: DUST COLLECTOR

Emission Source/Control: 000W8 - Process

Item 48.17:

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

Emission Unit: U-TANKS
Process: 001 Source Classification Code: 3-01-018-11
Process Description:

All facility process tanks used in the production of phenolic resin. Includes storage tanks, weigh tanks, filter tanks, drums, and tank wagons.

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: 0CBRC - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0CV32 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV61 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV64 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV65 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV66 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV67 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV68 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV72 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV74 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV75 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV77 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV78 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV88 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0CV89 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 0NB64 - Control
Control Type: NITROGEN BLANKET

Emission Source/Control: 0VB61 - Control
Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: 0VB70 - Control

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Control Type: VAPOR LOCK BALANCE RECOVERY SYSTEM

Emission Source/Control: CB703 - Control
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0ST32 - Process

Emission Source/Control: 0ST42 - Process

Emission Source/Control: 0ST61 - Process

Emission Source/Control: 0ST63 - Process

Emission Source/Control: 0ST64 - Process

Emission Source/Control: 0ST65 - Process

Emission Source/Control: 0ST66 - Process

Emission Source/Control: 0ST67 - Process

Emission Source/Control: 0ST68 - Process

Emission Source/Control: 0ST69 - Process

Emission Source/Control: 0ST70 - Process

Emission Source/Control: 0ST71 - Process

Emission Source/Control: 0ST72 - Process

Emission Source/Control: 0ST73 - Process

Emission Source/Control: 0ST74 - Process

Emission Source/Control: 0ST75 - Process

Emission Source/Control: 0ST77 - Process

Emission Source/Control: 0ST78 - Process

Emission Source/Control: 0ST88 - Process

Emission Source/Control: 0ST89 - Process

Emission Source/Control: 0ST90 - Process

Emission Source/Control: 0TW01 - Process

Emission Source/Control: 0TW02 - Process

Emission Source/Control: 0TW03 - Process

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Source/Control: 0TW04 - Process

Emission Source/Control: 0V703 - Process

Emission Source/Control: 0WT01 - Process

Emission Source/Control: 0WT02 - Process

Emission Source/Control: 0WT04 - Process

Emission Source/Control: FM322 - Process

Emission Source/Control: OOT80 - Process

Emission Source/Control: OOT81 - Process

Emission Source/Control: OOT82 - Process

Emission Source/Control: OOT83 - Process

Emission Source/Control: TM312 - Process

Emission Source/Control: TM313 - Process

**Condition 49: MACT General Provisions - emission unit level
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63, Subpart A

Item 49.1:

This Condition applies to Emission Unit: U-INCIN

Item 49.2:

This emission unit is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

**Condition 50: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement:40CFR 63.1206(b)(5), Subpart EEE

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 50.2:

Compliance Certification shall include the following monitoring:

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility changes the design, operation, or maintenance practices of the source in a manner that may adversely affect compliance with any emission standard that is not monitored with a CEMS, the facility must:

- 1) Notify NYSDEC at least 60 days prior to the change, unless the circumstances are documented that dictate why such prior notice is not reasonably feasible. The notification must include a description of the changes and which emission standards may be affected and a comprehensive performance test schedule and test plan under the requirements of §63.1207(f) that will document compliance with the affected emission standard.
- 2) Conduct a performance test under the requirements of §63.1207(f)(1) and (g)(1) to document compliance with the affected emission standard(s) and establish operating parameter limits as required in §63.1209, and submit to NYSDEC a Notification of Compliance under §63.1207(j) and §63.1210(d).
- 3) The facility may not burn hazardous waste for more than 720 hours after the change and prior to submittal of the notification of compliance. Burning hazardous waste may only be performed for the purposes of pretesting or comprehensive performance testing. The facility may petition NYSDEC to obtain written approval to burn hazardous waste in the interim prior to submitting a Notification of Compliance for purposes other than testing or pretesting. The facility must specify operating requirements, including limits on operating parameters, that is determined will ensure compliance with the emission standards of 40 CFR 63 Subpart EEE based on available information.

If the facility determines that a change will not adversely affect compliance with the emission standards or operating requirements, the facility must document the change in the operating record upon making such change. The facility must revise as necessary the performance test plan, Documentation of Compliance, Notification of Compliance, and startup, shutdown, and malfunction plan to reflect these changes.

For purposes of this condition, "change" means any change in design, operation, or maintenance practices that were documented in the comprehensive performance test plan, Notification of Compliance, or startup, shutdown, and malfunction plan.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1206(c)(3), Subpart EEE

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The hazardous waste incinerator must only operate in conjunction with an automatic waste feed cutoff (AWFCO) system. The AWFCO must follow the requirements established under 40 CFR 63.1206(c)(3).

The AWFCO must immediately and automatically cut off the hazardous waste incinerator feed:

- (A) When any of the following are exceeded: Operating parameter limits specified under § 63.1209; an emission standard monitored by a CEMS; or the allowable combustion chamber pressure;
- (B) When the span value of any CMS detector, except a CEMS, is met or exceeded;
- (C) Upon malfunction of a CMS monitoring an operating parameter limit specified under § 63.1209 or an emission level; or
- (D) When any component of the automatic waste feed cutoff system fails.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement:40CFR 63.1206(c)(3)(vii), Subpart EEE

Item 52.1:

The Compliance Certification activity will be performed for:

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Emission Unit: U-INCIN

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The automatic waste feed cutoff (AWFCO) system and associated alarms must be tested at least weekly to verify operability.

If the facility determines and documents that performing the weekly inspection will unduly restrict or upset operations, the facility may forgo weekly inspections. At a minimum, the facility must conduct operability testing at least monthly.

The facility shall maintain records of AWFCO operability test procedures and results. These records shall be maintained on-site for 5 years and be made available to NYSDEC upon request.

Monitoring Frequency: WEEKLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 53: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1206(c)(5), Subpart EEE

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 53.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must keep the combustion zone sealed at all times to prevent leaks.

The incinerator pressure shall be continuously maintained, monitored, and recorded using a continuous monitoring system. Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and hazardous waste feed to the incinerator must be immediately terminated if the limit is exceeded.

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Facility DEC ID: 9291100111

In addition, the facility owner or operator must ensure that hazardous waste is not present in the combustion chamber for the duration of each soot blowing operation.

Parameter Monitored: PRESSURE
 Upper Permit Limit: 12 inches of water
 Monitoring Frequency: CONTINUOUS
 Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -
 SEE MONITORING DESCRIPTION
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification
 Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 54.1:
 The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 54.2:
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility must ensure that the maximum total organic content fed to the incinerator does not exceed 8 pounds per minute on an hourly rolling average basis. The feed rate shall be monitored using a continuous monitoring system. Deviations shall be reported in semiannual compliance reports.

An operating parameter may be applicable to multiple standards. As discussed in 40 CFR 63.1209(i), if the performance tests for such standards are not performed simultaneously, the most stringent limit for a parameter derived from independent performance tests applies. Total organic content feed rate limits are established under 40 CFR 63.1209(j)(3) and 40 CFR 63.1209(k)(4).

Parameter Monitored: MASS FLOW RATE
 Upper Permit Limit: 8 pounds per minute
 Monitoring Frequency: CONTINUOUS
 Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1
 MINUTE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

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

**Condition 55: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 55.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall continuously monitor, maintain, and record the wet electrostatic precipitator (WESP) secondary power using a continuous monitoring system. Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and the hazardous waste feed to the incinerator must be immediately terminated if the secondary power falls below the limit specified by this condition.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the minimum secondary power specified by this condition is sufficient to ensure acceptable operation of the wet electrostatic precipitator. Durez established the minimum secondary power limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be included in each semiannual and annual compliance report.

The minimum WESP secondary power requirements are established under 40 CFR 63.1209 (m)(1)(iv) and (n)(3).

Parameter Monitored: POWER

Lower Permit Limit: 11.5 kilowatts

Monitoring Frequency: CONTINUOUS

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 56: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 56.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall continuously maintain, monitor, and record the temperature of the combustion chamber at a location that best represents the bulk gas temperature in the combustion zone. Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and the hazardous waste feed to the incinerator shall be immediately terminated if the minimum temperature specified below is not met.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the minimum temperature listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the minimum combustion temperature limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be included in each semiannual compliance report.

Minimum combustion temperature limits are established under 40 CFR 63.1209 (j)(1) and (k)(2).

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1662 degrees Fahrenheit

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1
MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 57: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 57.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall continuously maintain, monitor, and record the flow rate of gases exiting the wet electrostatic precipitator (stack gas flow rate). Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and the hazardous waste feed to the incinerator shall be immediately terminated if the maximum flow rate specified below is exceeded.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum stack gas flowrate listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum stack gas flowrate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be reported in each semiannual compliance report.

Maximum stack gas flowrate limits are established under 40 CFR 63.1209 (j)(2), (k)(3), (m)(2), (n)(5), and (o)(2).

Parameter Monitored: VOLUMETRIC FLOW RATE

Upper Permit Limit: 6380 cubic feet per minute

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Monitoring Frequency: CONTINUOUS
 Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

**Condition 58: Compliance Certification
 Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 58.1:
 The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 58.2:
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must ensure that the total hazardous waste feed rate fed to the incinerator does not exceed 44 pounds per minute on an hourly rolling average basis. The hazardous waste feed rate shall be monitored using a continuous monitoring system. Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and the hazardous waste feed to the incinerator must be immediately terminated if the limit specified below is exceeded.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum waste feed rate listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum feed rate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be included in each semiannual compliance report.

Maximum waste feed rate limits are established under 40 CFR 63.1209 (j)(3) and (k)(4).

Parameter Monitored: MASS FLOW RATE

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Upper Permit Limit: 44 pounds per minute
 Monitoring Frequency: CONTINUOUS
 Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

**Condition 59: Compliance Certification
 Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209, Subpart EEE

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 007782-50-5	CHLORINE

Item 59.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must control emissions of chlorine from the incineration unit by limiting the total feed rate of chlorine (both organic and inorganic) from all waste streams to less than 19.6 pounds per 12 hours on a 12-hour rolling average basis. When more than one feed stream is fed to the incinerator, the facility owner or operator must calculate the total contribution of chlorine from all sources (wastes, fuel, and any other materials) being fed to the incinerator. These values must be obtained and calculated in accordance with the feed stream analysis plan approved by NYSDEC on April 2nd, 2025.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum total feed rate of chlorine listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum chlorine feed rate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

test results.

Deviations shall be included in each semiannual compliance report.

Maximum chlorine feedrate limits are established under 40 CFR 63.1209 (n)(4) and (o)(1).

Parameter Monitored: MASS FLOW RATE
Upper Permit Limit: 19.6 pounds per 12 hours
Monitoring Frequency: CONTINUOUS
Averaging Method: 12-HOUR ROLLING AVERAGE, CALCULATED EVERY MINUTE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

**Condition 60: Compliance Certification
Effective for entire length of Permit**

Applicable Federal Requirement: 40CFR 63.1209(a)(2), Subpart EEE

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The oxygen and carbon monoxide CEMS used to monitor incinerator flue gas must be installed, calibrated, maintained, and continuously operated as described in Performance Specification 4B in 40 CFR 60 Appendix B.

Records of each daily system audit, calibration drift check, zero drift check, annual relative accuracy test audit, quarterly absolute calibration audit, and interference response test must be maintained at the facility for a period of at least 5 years and made available to NYSDEC upon request.

The facility shall submit a copy of each annual relative accuracy test audit and quarterly absolute calibration audit to the NYSDEC within 30 days of the completion of the analysis.

Manufacturer Name/Model Number: Thermo Scientific TEI 48iQ Dual Range
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 3 calendar month(s).

Condition 61: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(c), Subpart EEE

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall maintain a feed stream analysis plan (FAP) that includes the requirements of 40 CFR 63.1209(c)(2)(i)-(vi). A FAP for this facility was approved by NYSDEC on April 2, 2025. A copy of the document shall be maintained on-site and be made available to NYSDEC upon request.

Per 40 CFR 63.1209(c)(4), the facility must monitor, and record incinerator feed rates as follows:

- Determine and record the value of the parameter for each feed stream by sampling and analysis or other method;
- Determine and record the mass or volume flowrate of each feed stream by a continuous monitoring system (CMS). If the facility determines flowrate of a feed stream by volume, the facility must determine and record the density of the feed stream by sampling and analysis (unless the facility reports the constituent concentration in units of weight per unit volume (e.g., mg/l)); and
- Calculate and record the mass federate of the parameter per unit time.

The facility shall demonstrate compliance with the requirements of 40 CFR 63.1209(c)(4) by following the FAP approved by NYSDEC. Deviations to feed rate limits established during the latest comprehensive performance test shall be included in the semi-annual compliance report.

Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to NYSDEC upon request.

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Monitoring Frequency: CONTINUOUS
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(j)(4), Subpart EEE

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 62.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall ensure that the hazardous waste firing system is maintained in good operating condition by monitoring the atomization air pressure of the system. Atomization air pressure measurements shall be made and recorded on an hourly basis. The continuous monitoring system shall be designed and operated such that an audible alarm sounds when the atomizing air pressure specified by this condition falls outside the stated range. The stated range is based on manufacturer's specifications.

The facility owner or operator shall maintain a record indicating the date, duration, and cause of each alarm as well as any corrective action taken. Such records shall be maintained at the facility for a period of at least five years, and must be made available to the Department upon request. Deviations shall be included in each semiannual compliance report.

The atomizing pressure range is a manufacturer's specification to be maintained throughout incinerator operations, and is sufficient to ensure acceptable operation of the nozzles.

Parameter Monitored: PRESSURE

Lower Permit Limit: 11 inches of water

Upper Permit Limit: 36 inches of water

Monitoring Frequency: HOURLY

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 63: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(k)(1), Subpart EEE

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Item 63.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall continuously monitor, maintain, and record the inlet temperature to the wet electrostatic precipitator (WESP) using a continuous monitoring system. Data from the continuous monitoring system shall be sent to the automatic waste feed cut off, and feed to the incinerator shall be immediately terminated if the limit is exceeded. The maximum allowable temperature of 220 degree F is based on manufacturer's specifications and below the dioxin formation range of 450 to 850 degrees F.

Deviations shall be included in the semiannual compliance reports.

The maximum WESP inlet temperature limit is established under 40 CFR 63.1209 (n)(1), n(3), and (m)(1)(iv).

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 220 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1
MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 64: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(l)(1), Subpart EEE

Item 64.1:

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Facility DEC ID: 9291100111

precipitator sump blow down using a continuous monitoring system. The continuous monitoring system shall be designed and operated such that an audible alarm sounds when the minimum sump blow down listed in this condition is not met.

The facility owner or operator shall maintain a record indicating the date, duration, and cause of each alarm as well as any corrective action taken. Such records shall be maintained at the facility for a period of at least five years, and must be made available to the Department upon request. Deviations shall be included in the semiannual and annual compliance reports.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the minimum sump blow down listed in this condition is sufficient to ensure acceptable operation of the wet electrostatic precipitator. Durez established the minimum sump blow down during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Parameter Monitored: VOLUMETRIC FLOW RATE
 Lower Permit Limit: 7.2 gallons per minute
 Monitoring Frequency: CONTINUOUS
 Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1 MINUTE
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(m)(1)(iv), Subpart EEE

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007647-01-0	HYDROGEN CHLORIDE
CAS No: 0NY075-00-0	PARTICULATES

Item 66.2:

Compliance Certification shall include the following monitoring:

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

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

Monitoring Description:

The facility owner or operator shall continuously monitor, maintain, and record the pH of the sump liquor exiting the wet electrostatic precipitator using a continuous monitoring system. The continuous monitoring system shall be designed and operated such that an audible alarm sounds when the pH falls below the value specified by this condition.

The facility owner or operator shall maintain a record indicating the date, duration, and cause of each alarm as well as any corrective action taken. Such records shall be maintained at the facility for a period of at least five years and must be made available to the Department upon request. Deviations shall be included in each semiannual and annual compliance report.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the minimum sump liquor pH listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the minimum pH of the sump liquor limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Parameter Monitored: PH

Lower Permit Limit: 6.5 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1
MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 67: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(m)(1)(iv), Subpart EEE

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Item 67.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator shall continuously monitor, maintain, and record the flow rate of spray water to the conditioning section of the wet electrostatic precipitator using a continuous monitoring system. The continuous monitoring system shall be designed and operated such that an audible alarm sounds when the spray water flow rate listed in this condition falls below the stated value.

The facility owner or operator shall maintain a record indicating the date, duration, and cause of each alarm as well as any corrective action taken. Such records shall be maintained at the facility for a period of at least five years and must be made available to NYSDEC upon request. Deviations shall be included in the semiannual and annual compliance reports.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the spray water flow rate listed in this condition is sufficient to ensure acceptable operation of the wet electrostatic precipitator. Durez established the minimum spray water flow limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 224 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR ROLLING AVERAGE ROLLED EVERY 1
MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 68: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(m)(3), Subpart EEE

Item 68.1:

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 68.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must control emissions of particulate matter from the incineration unit by limiting the total feed rate of ash from all waste streams to no more than 42.5 pounds per 12 hours on a 12-hour rolling average basis. When more than one feed stream is fed to the incinerator, the facility owner or operator must calculate the total contribution of ash from all sources (wastes, fuel, and any other materials) being fed to the incinerator. These values must be obtained and calculated in accordance with the feed stream analysis plan approved by NYSDEC on April 2nd, 2025.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum feed rate of ash listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum feed rate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be included in each semiannual and annual compliance report.

Parameter Monitored: MASS FLOW RATE

Upper Permit Limit: 42.5 pounds per 12 hours

Monitoring Frequency: CONTINUOUS

Averaging Method: 12-HR ROLLING AVG, CALCULATED EA. HR
AS THE AVG OF THE PAST 12 OPERATING
HRS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 69: Compliance Certification
Effective for entire length of Permit**

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Applicable Federal Requirement: 40CFR 63.1209(n)(2)(ii), Subpart EEE

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007440-43-9 CADMIUM

CAS No: 007439-92-1 LEAD

Item 69.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must control emissions of cadmium and lead from the incineration unit by limiting the combined total feed rate of cadmium and lead from all waste streams to less than 0.0233 pounds per 12 hours on a 12-hour rolling average basis. When more than one feed stream is fed to the incinerator, the facility owner or operator must calculate the total contribution of arsenic, beryllium, and chromium from all sources (wastes, fuel, and any other materials) being fed to the incinerator. These values must be obtained and calculated in accordance with the feed stream analysis plan approved by NYSDEC on April 2nd, 2025.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum total feed rate of cadmium and lead listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum feed rate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

Deviations shall be included in each semiannual and annual compliance report.

Parameter Monitored: MASS FLOW RATE

Upper Permit Limit: 0.0233 pounds per 12 hours

Monitoring Frequency: CONTINUOUS

Averaging Method: 12-HOUR ROLLING AVERAGE, CALCULATED
EVERY MINUTE

Permit ID: 9-2911-00111/00105

Facility DEC ID: 9291100111

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 6 calendar month(s).

Condition 70: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 63.1209(n)(2)(ii), Subpart EEE

Item 70.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-INCIN

Regulated Contaminant(s):

CAS No: 007440-38-2	ARSENIC
CAS No: 007440-47-3	CHROMIUM
CAS No: 007440-41-7	BERYLLIUM

Item 70.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must control emissions of arsenic, beryllium, and chromium from the incineration unit by limiting the combined total feed rate of arsenic, beryllium, and chromium from all waste streams to less than 0.0072 pounds per 12 hours on a 12-hour rolling average basis. When more than one feed stream is fed to the incinerator, the facility owner or operator must calculate the total contribution of arsenic, beryllium, and chromium from all sources (wastes, fuel, and any other materials) being fed to the incinerator. These values must be obtained and calculated in accordance with the feed stream analysis plan approved by NYSDEC on April 2nd, 2025.

In addition to the monitoring required above, the facility owner or operator must verify, as part of the comprehensive performance test (CPT), that the maximum total feed rate of arsenic, beryllium, and chromium listed in this condition is sufficient to ensure acceptable operation of the incinerator. Durez established the maximum feed rate limit during the CPT performed in December 2024. The limit shall be confirmed or reestablished during subsequent performance tests. If a new limit is established, based on acceptable performance test results, it will apply from that day NYSDEC accepts performance test results.

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Deviations shall be included in each semiannual and annual compliance report.

Parameter Monitored: MASS FLOW RATE

Upper Permit Limit: .0072 pounds per 12 hours

Monitoring Frequency: CONTINUOUS

Averaging Method: 12-HOUR ROLLING AVERAGE, CALCULATED
EVERY MINUTE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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Facility DEC ID: 9291100111

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 in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

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

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all

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Facility DEC ID: 9291100111

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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

**Condition 71: Contaminant List
Effective for entire length of Permit**

Applicable State Requirement: ECL 19-0301

Item 71.1:

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

CAS No: 000108-90-7
Name: CHLOROBENZENE

CAS No: 000108-95-2
Name: PHENOL

CAS No: 000630-08-0
Name: CARBON MONOXIDE

CAS No: 001746-01-6
Name: 2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN

CAS No: 007439-92-1
Name: LEAD

CAS No: 007439-97-6
Name: MERCURY

CAS No: 007440-38-2

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Name: ARSENIC

CAS No: 007440-41-7

Name: BERYLLIUM

CAS No: 007440-43-9

Name: CADMIUM

CAS No: 007440-47-3

Name: CHROMIUM

CAS No: 007647-01-0

Name: HYDROGEN CHLORIDE

CAS No: 007782-50-5

Name: CHLORINE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY100-00-0

Name: TOTAL HAP

**Condition 72: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 72.1:

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

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department

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describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility 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 73: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 73.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 73.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall ensure that the regenerative thermal oxidizer (RTO) bypass stack is not used except during periods of RTO malfunction when a kettle has already been charged and a polymerization reaction is ongoing. The facility shall compile and maintain a record of each such use, as described in 6 NYCRR 201-1.4, that includes the following information at a minimum:

- (a) The date, time, and duration of bypass stack operation;
- (b) The cause of the malfunction and a description of any corrective action taken, if applicable; and
- (c) An estimate of emissions during the malfunction period.

The facility owner or operator shall notify the department within two working days after the event occurred and provide the information in (a) through (c).

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Records created pursuant to this condition shall be included in the semiannual compliance reports, and must be maintained at the facility for a period of at least five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 74: Air pollution prohibited
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.1

Item 74.1:

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 75: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 212-2.2

Item 75.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-INCIN

Item 75.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To demonstrate compliance with the mass emission limits in Table 2 of 6 NYCRR Part 212-2.2 -High Toxicity Air Contaminant List, the facility shall ensure that the following waste streams are not fed to the incineration unit:

-polychlorinated biphenyls (PCBs)

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-EPA waste codes F020, F021, F022, F023, F026, or F027

-radioactive materials which are source, special nuclear, or by-product material as defined by the Atomic Energy Act of 1954, as amended, or, regulated by 6 NYCRR 380

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 76: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.1

Item 76.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-KETTL

Item 76.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The facility owner or operator must continuously operate the regenerative thermal oxidizer (RTO) whenever process materials are present in reaction kettles 1-6, acetone is being routed to the refrigerated condenser, or the belt flaker is in use. The facility owner or operator shall maintain a log of the date and time of each startup and shutdown of the RTO.

In addition, the facility owner or operator must continuously monitor and record the temperature in the RTO in order to demonstrate proper operation. Records kept pursuant to this condition must be maintained at the facility for a period of at least five years, and must be made available to NYSDEC upon request. Deviations from the temperature limit specified in this condition must be reported in the semiannual compliance report.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 1300 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

**Condition 77: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement: 6 NYCRR 212-2.2

Item 77.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-TANKS

Item 77.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

On a weekly basis, the facility operator shall utilize an H-Nu meter, or equivalent, to conduct emission monitoring on the carbon system associated with the RCRA storage tanks (Tanks ST-63, OOT-80, OOT-81, OOT-82, and OOT-83). Sampling shall be conducted between the primary and secondary carbon canisters to minimize emissions to the environment through the secondary canister. A reading in excess of 100 ppm of organics against the background concentration shall indicate breakthrough in the primary carbon canister. If breakthrough is observed, the canisters shall be replaced in a timely manner to ensure breakthrough does not occur in the secondary carbon canister.

The facility operator shall maintain a record of each observation, including the date, measured concentration, background concentration and whether or not breakthrough was observed. Such records shall also indicate the date of canister replacement, if applicable. Records shall be maintained for at least five years, and must be made available to NYSDEC upon request.

Manufacturer Name/Model Number: H-Nu Meter or equivalent
Parameter Monitored: CONCENTRATION
Upper Permit Limit: 100 parts per million (by volume)
Monitoring Frequency: WEEKLY
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

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