



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 9-2936-00017/02003  
Mod 0 Effective Date: 04/03/2008 Expiration Date: 04/02/2018  
Mod 1 Effective Date: 05/05/2011 Expiration Date: 04/02/2018  
Mod 2 Effective Date: 07/16/2014 Expiration Date: 04/02/2018

Permit Issued To:FMC CORP  
1735 MARKET ST  
PHILADELPHIA, PA 19103

Facility: FMC CORP AGRICULTURAL PRODUCTS GROUP  
100 NIAGARA ST  
MIDDLEPORT, NY 14105

Contact: NOEL PARKER  
FMC CORP- AGRICULTURAL PRODUCTS  
100 NIAGARA ST  
MIDDLEPORT, NY 14105  
(716) 736-6314

Description:

FMC Agricultural Products located in Middleport, N.Y. blends and packages insecticides, fungicides and herbicides as liquids or powders for agricultural use.

This Air State Facility application incorporates monitoring conditions for the emissions control equipment associated with the various formulation processes. Emissions occurring from the mixing, blending and packaging operations can be volatile and particulate compounds. Emissions of organic vapors and particulate pesticides, except for the inert particulates subject to 212.4(c), are subject to the control requirements of 6NYCRR, Part 212.4(b) and Table 2 of 6NYCRR, Part 212.9 and are assigned an environmental rating of 'A' requiring 99% control. These emissions are controlled by baghouses and activated carbon, often in series.

The facility will keep records of pressure drop readings and maintenance required for readings outside of stated ranges, if an inspection determines such maintenance is required. The facility is required to document dates of carbon



changes and to monitor the pressure drop across the control device(s) where applicable.

An annual exception report shall be submitted identifying corrective action as a result of deviations from pressure drops.

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:            DOUGLAS E BORSCHEL  
   270 MICHIGAN AVE  
   BUFFALO, NY 14203-2915

Authorized Signature: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS



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

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



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

**Item 4.1:**

The Department reserves the right to 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.

**Condition 2-1: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 2-1.1:**

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.

**Condition 1-1: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-1.1:**

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

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;



e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: 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  
270 Michigan Avenue  
Buffalo, NY 14203-2999  
(716) 851-7165

**Condition 1-2: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS**

**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 1-2.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 9 Headquarters  
Division of Environmental Permits  
270 Michigan Avenue  
Buffalo, NY 14203-2915  
(716) 851-7165

**New York State Department of Environmental Conservation**

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: FMC CORP  
1735 MARKET ST  
PHILADELPHIA, PA 19103

Facility: FMC CORP AGRICULTURAL PRODUCTS GROUP  
100 NIAGARA ST  
MIDDLEPORT, NY 14105

Authorized Activity By Standard Industrial Classification Code:  
2879 - AGRICULTURAL CHEMICALS, NEC

Mod 0 Permit Effective Date: 04/03/2008

Permit Expiration Date: 04/02/2018

Mod 1 Permit Effective Date: 05/05/2011

Permit Expiration Date: 04/02/2018

Mod 2 Permit Effective Date: 07/16/2014

Permit Expiration Date: 04/02/2018





**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 2-1 6 NYCRR 211.1: Air pollution prohibited
- 2-2 6 NYCRR 212.4 (b): Compliance Demonstration
- 2-3 6 NYCRR 212.6 (a): Compliance Demonstration

**Emission Unit Level**

**EU=0-00231,EP=00231,Proc=WET**

- 2-4 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00231,EP=00235,Proc=235**

- 2-5 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00231,EP=00236,Proc=236**

- 2-6 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00231,EP=07210,Proc=ECF**

- 2-7 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00313,EP=00313,Proc=TAN**

- 2-8 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00313,EP=00314,Proc=314**

- 2-9 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00313,EP=00712,Proc=H71**

- 2-10 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00654,EP=00654,Proc=CAR**

- 2-11 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00702,EP=00702,Proc=PES**

- 2-12 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00704,EP=00704,Proc=TWO**

- 2-13 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00704,EP=07020,Proc=PKG**

- 2-14 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00711,EP=00535,Proc=PAC**

- 2-15 6 NYCRR 212.4 (b): Compliance Demonstration

**EU=0-00741,EP=00801,Proc=LIM**

- 1-19 6 NYCRR 212.4 (c): Compliance Demonstration

**EU=0-02314**

- 1-20 6 NYCRR 212.4 (b): Compliance Demonstration



**EU=0-0CLAY,EP=00705**

- 2-16 6 NYCRR 212.4 (c): Compliance Demonstration
- 2-17 6 NYCRR 212.4 (c): Compliance Demonstration

**EU=0-RAPID,Proc=RPD**

- 2-18 6 NYCRR 212.4 (b): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 17 ECL 19-0301: Contaminant List
- 2-19 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 18 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 1-21 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 2-20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 2-21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 2-22 6 NYCRR 201-5.4: Compliance Demonstration
- 20 6 NYCRR 211.2: Air pollution prohibited
- 1-23 6 NYCRR 211.2: Visible Emissions Limited
- 21 6 NYCRR 211.2: Compliance Demonstration

**Emission Unit Level**

- 22 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 23 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

**EU=0-00741,EP=00741,Proc=AIR**

- 2-23 6 NYCRR 212.4 (b): Compliance Demonstration



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

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

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

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



required to operate such device effectively.

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

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

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

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

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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



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

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

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

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

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

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

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

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

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

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



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

**Item K: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item L: Permit Exclusion - ECL 19-0305**

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

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

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

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 2-1: Air pollution prohibited**



Effective between the dates of 07/16/2014 and 04/02/2018

Applicable Federal Requirement:6 NYCRR 211.1

**Item 2-1.1:**

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

**Condition 2-2: Compliance Demonstration**

Effective between the dates of 07/16/2014 and 04/02/2018

Applicable Federal Requirement:6 NYCRR 212.4 (b)

**Item 2-2.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2-2.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

This permit describes various monitoring requirements for process emission sources associated with the formulation and packaging of insecticides and herbicides. Contaminants having an emission rate potential from a source in excess of 1 pound per hour of volatile and/or particulate matter (unless otherwise noted in a specific monitoring condition) are assigned an 'A' environmental rating and require a minimum of 99% control.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 99 percent reduction

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-3: Compliance Demonstration**

Effective between the dates of 07/16/2014 and 04/02/2018

Applicable Federal Requirement:6 NYCRR 212.6 (a)

**Item 2-3.1:**

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

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Emission Unit: 0-00231

Emission Unit: 0-00313

Emission Unit: 0-00654

Emission Unit: 0-00702

Emission Unit: 0-00704

Emission Unit: 0-00711

Emission Unit: 0-02314

**Item 2-3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any emission source or point are prohibited, except only emissions of uncombined water.

FMC shall document and evaluate any observed visible emissions or fallout and initiate corrective action. Records shall be maintained and made available to Department representatives on request.

The Department has the right to request or conduct a Method 9 opacity observation at any time.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 2-4: Compliance Demonstration**  
Effective between the dates of 07/16/2014 and 04/02/2018

**Applicable Federal Requirement: 6 NYCRR 212.4 (b)**

**Item 2-4.1:**

The Compliance Demonstration activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Emission Unit: 0-00231  
Process: WET

Emission Point: 00231

Regulated Contaminant(s):

CAS No: 052645-53-1      PERMETHRIN

CAS No: 082657-04-3      BIFENTHRIN

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

**Item 2-4.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Formulation of wettable powders containing Bifenthrin, Permethrin or Cypermethrin insecticides in building 23. Active ingredients are added to inert clays and wetting powders and blended and milled to achieve proper assay and particle size. Emissions of particulates are collected by a primary and secondary dust collector followed by an activated carbon Glide Pack to remove organic vapors prior to discharge to emission point 00231. The particle collector captures 99% of product and returns to formulation process.

A primary and secondary baghouse are used to control emissions of particulate material containing insecticides such as Bifenthrin, Permethrin or Cypermethrin. A Tribuflo particulate detector will sound an alarm if baghouse breakthrough occurs. In the event of breakthrough, the equipment will be shut-down until the baghouse is inspected and the appropriate repairs/bag replacement completed.

Each baghouse is equipped with a magnehelic gauge with a normal pressure drop range  $\Delta P$  of 1 to 7 inches of water. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before production can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever the production line is in operation.

The end of line Carbon Glide Pack unit will be changed annually.

New York State Department of Environmental Conservation

Permit ID: 9-2936-00017/02003

Facility DEC ID: 9293600017



Records of carbon change along with primary and secondary pressure drop readings are to be kept on-site in an accessible format for a period of five years and made available to Department representatives on request.

In addition, an annual report indicating any deviations from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-5: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Emission Point: 00235

Process: 235

Regulated Contaminant(s):

CAS No: 052645-53-1

PERMETHRIN

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 064742-94-5

NAPHTHA HEAVY AROMATIC

CAS No: 064742-95-6

NAPHTHA, LIGHT AROMATIC

CAS No: 082657-04-3

BIFENTHRIN

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

**Item 2-5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Liquid pesticides are formulated in a mixing tank



located in building 23 using active and inert ingredients-water, solvents such as Aromatic 100 and 200 (aromatic naphthas) and emulsifiers. Volatile emissions associated with the holding tank and packing line are vented to the FARR Glide Pack activated carbon filter and emission point 00235. The carbon filter is to be replaced on an annual basis.

The facility shall keep records of the carbon replacement date on-site for a period of 5 years and make these records available to Department representatives on request.

An annual report shall be submitted to this Department indicating the date of the last carbon change.

Monitoring Frequency: ANNUALLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

**Condition 2-6: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-6.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231                      Emission Point: 00236  
Process: 236

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

**Item 2-6.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Dry materials enter a mixing tank through a hopper that vents to a baghouse emission point 236. The magnehelic readings are to be recorded daily when operational. Readings outside the normal operating range will require inpection and maintenance procedures for the baghouse be implemented.

Records of pressure drop readings and maintenance performed are to be kept on-site for a period of 5 years and made available to Department representatives on

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request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: DAILY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED

RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-7: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00231

Emission Point: 07210

Process: ECF

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 2-7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Solvent based insecticide emulsifiable concentrates (EC) formulation are mixed and packaged. Solvent is added to the mixing tank from two outside storage tanks, tote bins or drums. Insecticides and emulsifiers are added from drums or totes. Solvent vapors from various mixing, packaging operations and work areas are directed to a Calgon High Velocity carbon unit and emission point 7210.

Emissions of volatile organic compounds from the insecticide emulsifier formulation and packaging process will be directed to a Calgon High Velocity carbon unit. The carbon unit will be changed annually and records of the change-out are to be kept on-site and made available to Department representatives on request.

An annual report shall be submitted to this Department indicating the date of the last carbon change.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.



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

**Condition 2-8: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00313 Emission Point: 00313  
Process: TAN

Regulated Contaminant(s):  
CAS No: 081777-89-1  
2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

**Item 2-8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The ventilation for the Clomazone storage tank will run through two in-line Vent Sorb activated carbon drums (emission point 00313). Monthly testing of the drums over a time period of one year showed no indication of breakthrough. Therefore, every six months the second unit will be moved to the lead unit and a new carbon unit be installed as the polish (i.e. second) unit to ensure adequate protection in the event of a release.

The facility shall keep records of all carbon drum change-out on-site for a period of 5 years and make this information available to Department representatives on request.

An annual report shall be submitted to this Department indicating the date of the last carbon change.

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

**Condition 2-9: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-9.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: 0-00313  
Process: 314

Emission Point: 00314

Regulated Contaminant(s):  
CAS No: 064742-94-5 NAPHTHA HEAVY AROMATIC

**Item 2-9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Volatile Organic Compounds (VOC) emitted from the Aromatic 200 storage tank are directed to three activated carbon drums in series. These drums are to be replaced on an annual basis.

Records of all carbon change-out shall be kept on-site for a period of 5 years and made available to Department representatives on request.

In addition, an annual report shall be submitted to this Department listing the dates of all carbon changes at the facility.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-10: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement: 6 NYCRR 212.4 (b)**

**Item 2-10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00313  
Process: H71

Emission Point: 00712

Regulated Contaminant(s):  
CAS No: 081777-89-1  
2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

**Item 2-10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This method described will be used to monitor for





discharged through a baghouse for collection of particulate material. A Tribuflo particulate detector will sound an alarm if particulate breakthrough occurs. In the event of breakthrough, the equipment will be shut-down until the baghouse is inspected and the appropriate repairs/bag replacement completed.

The baghouse is equipped with a magnehelic gauge to measure the pressure drop  $\Delta P$  which has a normal operating range of 1 to 7 inches of water. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds prior to discharge through emission point 00654. The carbon will be changed annually.

Records of carbon change along with pressure drop readings on the baghouse and Glide Pack are to be kept in an accessible format on-site for a period of five years and made available to Department representatives on request.

In addition, an annual report indicating any deviations from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP  
Lower Permit Limit: 1 inches of water  
Upper Permit Limit: 7 inches of water  
Monitoring Frequency: PER SHIFT  
Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED RANGE EXCEPT DURING STARTUP/SHUTDOWN  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

**Condition 2-12: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement: 6 NYCRR 212.4 (b)**





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from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-13: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-13.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00704

Emission Point: 00704

Process: TWO

Regulated Contaminant(s):

CAS No: 001563-66-2

2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

CAS No: 082657-04-3

BIFENTHRIN

**Item 2-13.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Carbofuran and Bifenthrin-based products are formulated in this area. A baghouse is used for collection of particulate material followed by a Tribuflo particulate detector. The detector will sound an alarm if baghouse breakthrough occurs. In the event of breakthrough, the equipment will be shut-down until the baghouse is inspected and the appropriate repairs/bag replacement completed.

The baghouse is equipped with a magnehelic gauge which has a normal operating range (  $\Delta p$  ) of 1- 7 inches of water. Readings outside this range will require the baghouse to be inspected and corrective action taken if required,



before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

An end of line Carbon Glide Pac unit will be used to remove organic compounds prior to discharge to emission point 00704. The carbon Glide Pac will be changed annually.

Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

In addition, an annual report indicating any deviations from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-14: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00704

Emission Point: 07020

Process: PKG

Regulated Contaminant(s):

CAS No: 064742-95-6

NAPHTHA, LIGHT AROMATIC

CAS No: 064742-94-5

NAPHTHA HEAVY AROMATIC

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**Item 2-14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A TIGG NIX TOX activated carbon adsorption system is used to remove organic vapors emitted from the various EC and EW packaging lines and the packout tank (located in building 70) prior to discharge to emission point 07020. Carbon will be replaced on an annual basis.

The facility shall maintain records of the carbon replacement date on-site for a period of 5 years and submit the date of the last carbon change in an annual report to this Department.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-15: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (b)**

**Item 2-15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00711

Emission Point: 00535

Process: PAC

Regulated Contaminant(s):

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

CAS No: 052645-53-1 PERMETHRIN

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 067375-30-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-ALPHA

CAS No: 082657-04-3 BIFENTHRIN

CAS No: 0NY075-00-0 PARTICULATES

CAS No: 000115-29-7

1-4-5-6-7-7 HEXACHLORO-5-NORBORENE-2-3DIMETHANOL CYCLIC

SULF

**Item 2-15.2:**

Compliance Demonstration shall include the following monitoring:



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

Monitoring Description:

Formulated powder material is dumped into a hopper and packaged into small (1 oz-1 lb) packages. The dust from the hopper is captured by a primary and secondary baghouse. A Tribuflor particulate detector which alarms if excessive particulates are detected in the secondary baghouse outlet. In the event of breakthrough, the equipment will be shut-down until the baghouse is inspected and the appropriate repairs/bag replacement completed.

Each baghouse is equipped with a magnehelic gauge which has a normal operating pressure drop range ( $\Delta P$ ) of 1" to 7" of water. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs initiated as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever the process is in operation.

An end of line 3 CF Carbon Glide Pack unit will be used to remove organic compounds and then exhausted to emission point 00535. The unit will be changed annually.

Records of carbon change along with baghouse pressure drop readings are to be kept on-site in an accessible format for a period of five years and made available to Department representatives on request.

In addition, an annual report indicating any deviations from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

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**Condition 1-19: Compliance Demonstration**

Effective between the dates of 05/05/2011 and 04/02/2018

Applicable Federal Requirement:6 NYCRR 212.4 (c)

**Item 1-19.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00741

Emission Point: 00801

Process: LIM

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 1-19.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from the lime addition system shall not exceed 0.05 gr/dscf. Visible emissions or dust fallout will require the facility to inspect, clean, and if required change cartridge filters.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-20: Compliance Demonstration**

Effective between the dates of 05/05/2011 and 04/02/2018

Applicable Federal Requirement:6 NYCRR 212.4 (b)

**Item 1-20.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-02314

Regulated Contaminant(s):

CAS No: 001563-66-2

2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

CAS No: 007664-38-2

PHOSPHORIC ACID

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

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CAS No: 082657-04-3      BIFENTHRIN  
CAS No: 0NY998-00-0      VOC  
CAS No: 095465-99-9      CADUSAFOS

**Item 1-20.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

A dry and liquid microencapsulating operation has both a baghouse for dust and ventsorb activated carbon unit for VOC emissions. Cadusafos(Rugby) is the final product packaged.

The baghouse is equipped with a magnehelic gauge which has an upper limit of 7 and lower limit of 1. If readings are outside this range, the baghouse is to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

A Vent Sorb carbon unit (three in series) will remove volatile emissions from the liquid line. The carbon will be changed semi-annually. Records of carbon change along with pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-16: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement:6 NYCRR 212.4 (c)**

**Item 2-16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0CLAY

Emission Point: 00705

Regulated Contaminant(s):

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Facility DEC ID: 9293600017



CAS No: 0NY075-00-0 PARTICULATES

**Item 2-16.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Particulate emissions from the blending and handling operations of clays and inert materials directed to emission point 705 are not to exceed 0.05 gr/dscf. A baghouse will control emissions and pressure drops will be recorded and monitored.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-17: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement: 6 NYCRR 212.4 (c)**

**Item 2-17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-0CLAY

Emission Point: 00705

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 2-17.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Clays and wetting agents are blended as a diluent for products in this area. A fabric filter is used for the collection of particulate material prior to exhausting to emission point 00705. A Tribuflor particulate detector will sound an alarm if baghouse breakthrough occurs. In the event of breakthrough, the equipment will be shut-down until the baghouse is inspected and the appropriate repairs/bag replacement completed.

The baghouse is equipped with a magnehelic gauge to





measure the pressure drop ( $\Delta P$ ) which has a normal operating range of 1 to 7 inches of water. Readings outside this range will require the baghouse to be inspected and corrective action taken if required, before the line can resume. The pressure drop is to be monitored and recorded per shift along with maintenance or repairs taken as the result of readings outside the specified range.

The magnehelic gauge must be functioning whenever process is in operation.

Records of pressure drop readings are to be kept on-site for a period of five years and made available to Department representatives on request.

In addition, an annual report indicating any deviations from normal operating parameters and corrective action completed as a result of those deviations shall be submitted to this Department along with the date of the last carbon change.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 7 inches of water

Monitoring Frequency: PER SHIFT

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 2-18: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable Federal Requirement: 6 NYCRR 212.4 (b)**

**Item 2-18.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-RAPID

Process: RPD

Regulated Contaminant(s):

CAS No: 052315-07-8

CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

CAS No: 055285-14-8

CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 082657-04-3 BIFENTHRIN

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CAS No: 008003-34-7 PYRETHRUM

**Item 2-18.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Volatile emissions from the rapid response packaging areas located in buildings 65 and 71 are directed through their respective Calgon High Flow Ventsorb activated carbon unit (HVC). The carbon in the HVC canister will be replaced annually. Records of carbon change will be recorded and kept on-site for a period of five years and made to Department representatives on request.

This permit reflects pre-approval for the proposed rapid response line in building 71.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



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

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**



**Condition 17: Contaminant List**

Effective between the dates of 04/03/2008 and 04/02/2018

**Applicable State Requirement: ECL 19-0301**

**Item 17.1:**

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

CAS No: 000067-66-3

Name: CHLOROFORM

CAS No: 000071-43-2

Name: BENZENE

CAS No: 000075-09-2

Name: DICHLOROMETHANE

CAS No: 000115-29-7

Name: 1-4-5-6-7-7 HEXACHLORO-5-NORBORENE-2-3DIMETHANOL

CYCLIC SULF

CAS No: 001563-66-2

Name: 2,3-DIHYDRO-2,2-DIMETHYL-7-BENZOFURANYL

METHYLCARBAMATE

CAS No: 007664-38-2

Name: PHOSPHORIC ACID

CAS No: 008003-34-7

Name: PYRETHRUM

CAS No: 052315-07-8

Name: CYCLOPROPANECARBOXYLIC

ACID,3-(2,2-DICHLOROETHENYL)-2,2-DIME

CAS No: 052645-53-1

Name: PERMETHRIN

CAS No: 055285-14-8

Name: CARBAMIC ACID,

((DIBUTAM)THIO)ME23DIHYD22DIME7BENZFURANYL

CAS No: 064742-94-5

Name: NAPHTHA HEAVY AROMATIC

CAS No: 064742-95-6

Name: NAPHTHA, LIGHT AROMATIC

CAS No: 067375-30-8



Name: CYCLOPROPANECARBOXYLIC  
ACID,3-(2,2-DICHLOROETHENYL)-ALPHA

CAS No: 081777-89-1

Name:  
2-(2-CHLOROPHENYL)METHYL-4,4-DIMETHYL-3-ISOXAZOL-IDINONE

CAS No: 082657-04-3

Name: BIFENTHRIN

CAS No: 095465-99-9

Name: CADUSAFOS

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

**Condition 2-19: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 2-19.1:**

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

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

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

(d) The department may also require the owner or operator to include, in reports described





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

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 1-21: Unavoidable noncompliance and violations**  
**Effective between the dates of 05/05/2011 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 1-21.1:**

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

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

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

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



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

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 19: Emission Unit Definition**  
**Effective between the dates of 04/03/2008 and 04/02/2018**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 19.1(From Mod 2):**

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

Emission Unit: 0-00231

Emission Unit Description:

Emulsifiable concentrates (EC). Formulation of liquid and wettable powder insecticides located in building 23 and including emission points 00235, 00231, 00236. Also, includes EC formulation in building 72 to include emission point 07210.

Building(s): 23  
70  
72

**Item 19.2(From Mod 2):**

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

Emission Unit: 0-00313

Emission Unit Description:

The Command 3ME herbicide formulation process. Ventilation is provided for the mixing tanks, the packaging lines and work areas. A Tigg NB 15 canister containing 12000 lbs of activated carbon scrubs the ventilation air and exhausts through emission point 00712 located outside building 71.

Storage tank ventilation (emission point 00313) for Command technical tank located outside building 23. Two activated carbon ventsorb drums absorb residual vapors from the clomazone storage tank, breathing ventilation only.

This emission unit also describes a 10,000 gallon Aromatic 200 storage tank and three associated carbon drums vented to emission point 00314 located in building 23.





Building(s): 23  
23-Outside  
71

**Item 19.3(From Mod 2):**

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

Emission Unit: 0-00654

Emission Unit Description:

Carbofuran technical handling system. Tote bins of Carbofuran are dumped into one of two hoppers located in Building 65, then conveyed to the processing area. Ventilation air for the system is discharged through a fabric collector and Glide Pack carbon filter and then discharged to emission point 654.

Building(s): 65

**Item 19.4(From Mod 2):**

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

Emission Unit: 0-00702

Emission Unit Description:

Main pesticide formulation area includes general ventilation recycle area, flowable mixing area, east and west product line areas, and Raymond mill. Ventilation from each area is ducted to a main plenum and then to emission point 702.

General ventilation air from carbofuran and bifenthrin formulation areas in Building 70, including the flowable mixing room, dry rooms and recycle area discharges to a dust collector/baghouse (EMTROL jet dust collector model #EMT-80-M1) and then flows to an Airguard filter unit (Model 10 SA 07-26-02) that contains both fabric filters and activated carbon. The filtered air is then discharged through the EP 702 stack.

Ventilation air from the east and west product lines (carbofuran and bifenthrin filling and packaging operations) discharge to respective east and west dust collectors/baghouses and then flow through an (2) Airguard filter unit (model 07 SA 02-26-02) that contains both fabric filters and activated carbon prior to discharge through EP 702.

Ventilation air from the Carbofuran milling area (Raymond-carbofuran milling operations) flows through a separate Airguard filter unit (model 04 SA 02-26 02) that contains both fabric filters and activated carbon prior to discharge through EP 702.

Building(s): 70

**Item 19.5(From Mod 2):**



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

Emission Unit: 0-00704

Emission Unit Description:

Two areas, export packaging and flowable milling areas are associated with Carbofuran and Bifentrin based materials. Emission are directed to a fabric filter and carbon glide pack and exhausted to emission point 000704 located outside buildings 70 and 73.

Two 12,500 gallon solvent storage tanks containing Aromatic 100 (T-7810) and Aromatic 200 (T-7820) are located outside. One 12,500 gallon product holding tank (T-7830) is located in the eastside of the Furdan packaging room. Solvent vapors are captured by activated carbon TIGG NIX TOX unit, EP 7020.

Building(s): 70  
72

**Item 19.6(From Mod 2):**

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

Emission Unit: 0-00711

Emission Unit Description:

Form fill and seal ventilation system. Packaging of powders only. There is a primary and secondary dust collector followed by a Glide Pack carbon filter and vented to emission point 00535 located in building 71.

Building(s): 71

**Item 19.7(From Mod 2):**

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

Emission Unit: 0-00741

Emission Unit Description:

Groundwater Extraction Wells. Extraction of groundwater contaminated with methylene chloride from ten extraction wells via a low profile air stripper located in Building 74 (emission point 00741) and then directed to the on-site Water Treatment Plant.

This emission unit also includes the lime dump hopper vent located in building 80- water treatment plant. Dust is controlled by a fabric filter and vented to emission point 00801.

Building(s): 74  
80

**Item 19.8(From Mod 2):**

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

Emission Unit: 0-02314

Emission Unit Description:

Formulation of Cadusafos (Rugby TM) liquid,



microencapsulated product. Particulate emission of dry product are controlled by a fabric filter and directed to emission point 02314 located in building 23. Volatile organic compound emissions are controlled by three vent fed FARR activated carbon glide pack.

Building(s): 23

**Item 19.9(From Mod 2):**

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

Emission Unit: 0-0CLAY

Emission Unit Description:

Clay handling system for Carbofuran manufacturing area. Emissions are directed to a fabric filter dust collector emission point 00705.

Building(s): 70

**Item 19.10(From Mod 2):**

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

Emission Unit: 0-RAPID

Emission Unit Description:

Rapid Response Packaging. Room ventilation for the 300 gallon holding tank, the product fill lines and from the general work area is directed to a high velocity carbon unit, emission point 00651 located outside building 65. A second Rapid Response line will be added and located in building 71. Emissions from this line will also be directed to a high velocity carbon unit before discharge to emission point 71651.

Building(s): 65  
71

**Item 19.11(From Mod 0):**

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

Emission Unit: 0-00314

Emission Unit Description:

Ventilation

Building(s): 23

**Item 19.12(From Mod 1):**

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

Emission Unit: 0-00651

Emission Unit Description:

Packaging of products into containers. The emission point 00651 provides room ventilation for the 300 gallon holding tank, the product fill lines and from the general work area.

Building(s): 65

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Facility DEC ID: 9293600017



**Item 19.13(From Mod 1):**

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

Emission Unit: 0-00705

Emission Unit Description:

Clay handling system for Carbofuran manufacturing area.

Emissions are directed to a fabric filter dust collector emission point 00705.

Building(s): 70

**Item 19.14(From Mod 0):**

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

Emission Unit: 0-00801

Emission Unit Description:

DUST HOUSE FROM LIME ADDITION TO WATER TREATMENT PLANT.

Building(s): 80

**Condition 2-20: Renewal deadlines for state facility permits**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

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

**Item 2-20.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

**Condition 2-21: Compliance Demonstration**  
**Effective between the dates of 07/16/2014 and 04/02/2018**

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

**Item 2-21.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2-21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 9  
270 Michigan Ave.



Buffalo, NY 14203

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 2-22: Compliance Demonstration**  
Effective between the dates of 07/16/2014 and 04/02/2018

**Applicable State Requirement:6 NYCRR 201-5.4**

**Item 2-22.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2-22.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

FMC formulates and packages liquid and powdered pesticides. Processes consist of mixing and blending and packaging. Emissions consist of particulate and organic compounds and are controlled by baghouses and activated carbon.

For the evaluation of Part 212 sources:

1. The facility may initiate new product formulations and construct new process emission sources involving mixing and blending and packaging without a permit modification provided:

(a) Changes do not cause emissions to exceed any emission limitation contained in regulations or applicable requirements.

(b) Changes do not cause the source to become subject to any additional regulations or requirements.

(c) Changes do not seek to establish or modify a federally-enforceable emission cap or limit.

(d) Changes do not require additional controls to achieve compliance.

These changes may be constructed without prior approval. However, a change that meets these criteria and also involves relocation of emission points, emission of any air pollutant not previously authorized or emitted, or installation or alteration of any air cleaning device will require a 30 day letter submitted to the Region 9 Buffalo office at 270 Michigan Avenue, Buffalo, 14203.



2. FMC will be allowed to proceed with the new product formulation/emission source/emission point without re-opening the permit by submitting the following information 30 days prior to such changes and shall include:

(a) A detailed process description of the process and control equipment involved and process flow diagram and the date on which the change will occur.

(b) The facility shall identify the type of contaminants emitted, provide calculations of emission rate potentials, hourly actual emissions, and projected annual emissions for the proposed product/process.

(c) Submit all stack parameters for the emission point as required on the permit application.

(d) A revised facility site map showing the location of the new emission source/point, distance to property line and nearest off-site receptor.

3. An Air Guide-1 evaluation of annual and short term emission impacts shall be conducted using the potential hourly and annual emissions and stack data and site location information as submitted in Item 2.

4. Modification of existing permit terms and conditions will require a permit modification.

5. For inert particulate materials such as lime or clay, emissions will be subject to the 0.05 grain/dscf limit.

6. Particulate (powdered) pesticide products are assigned an 'A' environmental rating and an hourly emission rate potential in excess of 1 pound per hour will require a minimum of 99% control. Use of a fabric filter followed by activated carbon is an acceptable demonstration of the required control efficiency.

7. Potential emissions of any individual hazardous air pollutant (HAP) in excess of 10 tons and total HAP in excess of 25 ton will require a federally enforceable emission cap to limit those emissions to less than major source thresholds.

At any time, the Department may require a permit modification to impose additional permit requirements or special conditions if as a result of the proposed changes if it is determined that there is an air quality impact



which triggers additional requirements.

Records of all changes and the date(s) those changes were instituted shall be kept on-site and made available to Department representatives on request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 20: Air pollution prohibited**  
**Effective between the dates of 04/03/2008 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 20.1:**

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

**Condition 1-23: Visible Emissions Limited**  
**Effective between the dates of 05/05/2011 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 1-23.1:**

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 21: Compliance Demonstration**  
**Effective between the dates of 04/03/2008 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 21.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

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

**Condition 22: Emission Point Definition By Emission Unit  
Effective between the dates of 04/03/2008 and 04/02/2018**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 22.1(From Mod 2):**

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

Emission Unit: 0-00231

Emission Point: 00231

Height (ft.): 46	Diameter (in.): 24	
NYTMN (km.): 4789.6	NYTME (km.): 218.1	Building: 23

Emission Point: 00235

Height (ft.): 46	Diameter (in.): 18	
NYTMN (km.): 4789.7	NYTME (km.): 218.1	Building: 23

Emission Point: 00236

Height (ft.): 30	Diameter (in.): 8	
NYTMN (km.): 4789.65	NYTME (km.): 218.1	Building: 23





Emission Point: 07210  
Height (ft.): 39 Diameter (in.): 6  
NYTMN (km.): 4789.758 NYTME (km.): 218.03 Building: 72

**Item 22.2(From Mod 2):**

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

Emission Unit: 0-00313

Emission Point: 00313  
Height (ft.): 16 Diameter (in.): 3  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 23-Outside

Emission Point: 00314  
Height (ft.): 39 Diameter (in.): 24  
NYTMN (km.): 4789.7 NYTME (km.): 218.1 Building: 23

Emission Point: 00712  
Height (ft.): 15 Diameter (in.): 22  
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 71

**Item 22.3(From Mod 2):**

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

Emission Unit: 0-00654

Emission Point: 00654  
Height (ft.): 60 Diameter (in.): 24  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 65

**Item 22.4(From Mod 2):**

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

Emission Unit: 0-00702

Emission Point: 00702  
Height (ft.): 42 Diameter (in.): 66  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

**Item 22.5(From Mod 2):**

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

Emission Unit: 0-00704

Emission Point: 00704  
Height (ft.): 42 Diameter (in.): 30  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

Emission Point: 07020  
Height (ft.): 39 Diameter (in.): 6  
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 70



**Item 22.6(From Mod 2):**

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

Emission Unit: 0-00711

Emission Point: 00535

Height (ft.): 44 Diameter (in.): 20  
NYTMN (km.): 4789.6 NYTME (km.): 218.1 Building: 71

**Item 22.7(From Mod 2):**

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

Emission Unit: 0-00741

Emission Point: 00741

Height (ft.): 35 Diameter (in.): 8  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 74

Emission Point: 00801

Height (ft.): 35 Diameter (in.): 12  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 80

**Item 22.8(From Mod 2):**

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

Emission Unit: 0-02314

Emission Point: 02314

Height (ft.): 44 Diameter (in.): 19  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 23

**Item 22.9(From Mod 2):**

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

Emission Unit: 0-0CLAY

Emission Point: 00705

Height (ft.): 34 Diameter (in.): 20  
NYTMN (km.): 4789.649 NYTME (km.): 218.105 Building: 70

**Item 22.10(From Mod 2):**

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

Emission Unit: 0-RAPID

Emission Point: 00651

Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4789.65 NYTME (km.): 218.1 Building: 65

Emission Point: 71651

Height (ft.): 36 Diameter (in.): 6  
NYTMN (km.): 4789.758 NYTME (km.): 218.03 Building: 71



**Condition 23: Process Definition By Emission Unit**  
Effective between the dates of 04/03/2008 and 04/02/2018

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 23.1(From Mod 2):**

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

Emission Unit: 0-00231

Process: 235

Source Classification Code: 3-01-033-11

Process Description:

Liquid insecticides are formulated in a mixing tank using water, non-flammable solvents and emulsifiers. Volatile emissions from the mixing tank, packaging lines and room ventilation of the work area are vented a through FARR activated carbon Glide pack and to emission point 00235. Dry materials are captured by a baghouse and directed to emission point 236 (process 236).

Emission Source/Control: 0235B - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00235 - Process

**Item 23.2(From Mod 2):**

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

Emission Unit: 0-00231

Process: 236

Source Classification Code: 3-01-033-11

Process Description:

Dry materials dump hopper. A baghouse (emission point 236) provides dust control during the addition of dry raw materials through a hopper into a mixing tank located in building 23. The primary purpose is to minimize worker exposure to dusts when dumping raw materials.

Emission Source/Control: 0236C - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00236 - Process

**Item 23.3(From Mod 2):**

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

Emission Unit: 0-00231

Process: ECF

Source Classification Code: 3-01-033-11

Process Description:

Insecticide emulsifiable concentrates (EC) formulation area: mixes and packages solvent-based insecticides. Solvent is added to the mixing tank from two 9600 gallon (tanks 7810 & 7820) inside Aromatic 100 and Aromatic 200





Process: 314 Source Classification Code: 4-07-016-12

Process Description:

Aromatic 200 solvent is stored in a 10,000 gallon storage tank. Emissions travel through a closed-loop system and pass through three activated carbon drums in series and back to the tank. There is a conservation vent that allows air into or out of the tank as necessary identified as emission point 00314. The carbon consists of three 55 gallon Vent Sorb drums.

Emission Source/Control: 0A314 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0B314 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0C314 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00314 - Process

**Item 23.6(From Mod 2):**

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

Emission Unit: 0-00313  
Process: H71 Source Classification Code: 3-01-033-11

Process Description:

Formulation of Command 3ME herbicide. The process microencapsulates the herbicide molecule. The process includes mixing tanks, packaging lines, and general work areas. Emissions are controlled by a 12,000 pound TIGG NB 15 activated carbon unit emission point 00712.

Emission Source/Control: 00712 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0712B - Process

**Item 23.7(From Mod 2):**

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

Emission Unit: 0-00313  
Process: TAN Source Classification Code: 3-01-033-11

Process Description:

Clomazone Tank & Unloading. Two 55 gallon activated carbon Vent Sorb units absorb residual vapors from the heated clomazone storage tank. Air is displaced to vent identified as emission point 00313 while filling the storage tank from tanker trucks.

Emission Source/Control: 00313 - Control  
Control Type: ACTIVATED CARBON ADSORPTION



Emission Source/Control: 0B313 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0A313 - Process

**Item 23.8(From Mod 2):**

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

Emission Unit: 0-00654  
Process: CAR Source Classification Code: 3-01-033-11  
Process Description:

Carbofuran Technical Dump. Technical carbofuran from tote bins is charged into one of two hoppers located in building 65 and transported by way of bucket elevators and a series of screw conveyors to a ribbon blender located in the Furadan processing area. From this blender the material is discharged to existing carbofuran technical handling systems which feed the various processing system. Particulates pass through a fabric filter and any volatile compounds removed by carbon Glide pack (EP 654).

Emission Source/Control: 00654 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00655 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0A654 - Process

**Item 23.9(From Mod 2):**

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

Emission Unit: 0-00702  
Process: PES Source Classification Code: 3-01-033-11  
Process Description:

Pesticide formulation area. General ventilation air from the carbofuran and bifenthrin formulation areas in building 70 including the flowable mixing room, dry rooms and recycle area discharge to a dust collector and then to an Airguard filter unit (10 SA 07-26-02) that contains fabric filters and activated carbon and then to emission point 702. The product formulated is furadan (carbofuran) dust base.

Ventilation air from the East and West product lines (carbofuran and bifenthrin filling and packaging operations) discharge to an east and west dust collector and then through Airguard filter unit (07 SA 02-26-02) and then to emission point 00702.

Raymond mill for carbofuran milling discharges to Airguard

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filter (04 SA 02-26-02) and then to EP 00702.

Emission Source/Control: 0A702 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0B702 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0D702 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 0F702 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00702 - Process

Emission Source/Control: 0C702 - Process

Emission Source/Control: 0E702 - Process

**Item 23.10(From Mod 2):**

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

Emission Unit: 0-00704

Process: PKG

Source Classification Code: 3-01-033-11

Process Description:

Liquid insecticide formulation and packaging line for 9600 gallon product storage tank. Solvent vapors are controlled by activated carbon TIGG NIX TOX 400XP unit, EP 07020. Two 12,500 gallon Aromatic 100 and Aromatic 200 storage tanks are located outside and directly vented to atmosphere.

Emission Source/Control: 07020 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 7020A - Process  
Design Capacity: 10,000 gallons

Emission Source/Control: 7020B - Process  
Design Capacity: 10,000 gallons

Emission Source/Control: 7020C - Process  
Design Capacity: 9,600 gallons

**Item 23.11(From Mod 2):**

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

Emission Unit: 0-00704

Process: TWO

Source Classification Code: 3-01-033-11

Process Description:



Packaging line to fill small containers of formulated liquid pesticide product. Products are placed into a 3000 gallon holding tank. Product from the holding tank goes to a 50 gallon head tank from which containers are filled. Solvent vapors are captured by activated carbon Glide Pack EP 00704.

Emission Source/Control: 00700 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00704 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0A704 - Process

**Item 23.12(From Mod 2):**

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

Emission Unit: 0-00711  
Process: PAC Source Classification Code: 3-01-033-11  
Process Description:

Form fill and seal packaging ventilation system. Powders (formulated material) are dumped into a hopper and packaged into small (1 oz-1 lb) packages. The dust from the hopper is captured by a primary and secondary baghouse followed by 3CF Glide Pack carbon filter (emission point 00535).

Emission Source/Control: 00710 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: 00711 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0B711 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0A711 - Process

**Item 23.13(From Mod 2):**

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

Emission Unit: 0-00741  
Process: AIR Source Classification Code: 5-04-104-09  
Process Description:

Five tray low profile air stripper (EP 741) to remove methylene chloride, benzene and other organic compounds from groundwater and breakpoint chlorination process to convert ammonia to nitrogen. Water from the ten groundwater extraction wells is collected into the air stripper influent tank.





Emission Source/Control: 00741 - Process

**Item 23.14(From Mod 2):**

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

Emission Unit: 0-00741

Process: LIM

Source Classification Code: 3-01-033-11

Process Description:

Lime is dumped into hopper at water treatment system.  
Lime dust controlled by a fabric filter, model Dracco MBII  
32 fabric collector is vented to emission point 801.  
Approximately 400 lbs of lime per day is used when  
treating water.

Emission Source/Control: 00801 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 0A801 - Process

**Item 23.15(From Mod 2):**

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

Emission Unit: 0-02314

Process: CAD

Source Classification Code: 3-01-033-11

Process Description:

Cadusatos liquid formulation and packaging in building  
23. Microencapsulation of Cadusatos insecticide.  
Particulate emissions are collected by fabric filter and  
volatile emissions through three carbon vent-sorb drums.  
(emission point 2314)

Emission Source/Control: 02314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: B2314 - Control

Control Type: FABRIC FILTER

Emission Source/Control: C2314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: D2314 - Control

Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: A2314 - Process

**Item 23.16(From Mod 2):**

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

Emission Unit: 0-0CLAY

Process: CLA

Source Classification Code: 3-01-033-11

Process Description:

Clay handling system. Inert clays and wetting agents are

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blended as a diluent for product. Emissions are directed to a fabric filter dust collector (emission point 00705).

Emission Source/Control: 00705 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 0A705 - Process

**Item 23.17(From Mod 2):**

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

Emission Unit: 0-RAPID  
Process: RPD Source Classification Code: 3-01-033-11  
Process Description:

Formulated product is packaged in containers ranging from one pint to thirty gallons. The products packaged include carbofuran, clomazone, bifenthrin, permethrin and cypermethrin.

Emission Source/Control: RPD01 - Control  
Control Type: ACTIVATED CARBON ADSORPTION

Emission Source/Control: RPD02 - Process

**Item 23.18(From Mod 1):**

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

Emission Unit: 0-00651  
Process: NEW Source Classification Code: 3-01-033-11  
Process Description:

Formulated product is packaged in containers ranging from one pint to thirty gallons. The products packaged include carbofuran, clomazone, bifenthrin, permethrin and cypermethrin.

Emission Source/Control: 00651 - Control  
Control Type: VAPOR RECOVERY SYSTEM (VAPOR ADSORPTION/ABSORPTION UNIT)

Emission Source/Control: 0A651 - Process

Emission Source/Control: 0B651 - Process

**Condition 2-23: Compliance Demonstration**

**Effective between the dates of 07/16/2014 and 04/02/2018**

**Applicable State Requirement:6 NYCRR 212.4 (b)**

**Item 2-23.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: 0-00741

Emission Point: 00741

Process: AIR

Regulated Contaminant(s):

CAS No: 000067-66-3

CHLOROFORM

CAS No: 000075-09-2

DICHLOROMETHANE

CAS No: 000071-43-2

BENZENE

**Item 2-23.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Under the requirements of a RCRA Administrative Order on Consent, entered into by FMC, NYSDEC and USEPA, groundwater containing various site-related constituents is extracted and directed to an air stripper. This system includes extraction of groundwater from ten extraction wells that are primarily impacted with methylene chloride. A low-profile air stripper located at Building 74 removes volatile organic compounds before directing the groundwater to the wastewater treatment plant at the west end of the property. A flow rate monitor records the GPM through the air stripper.

The air stripper was replaced in May of 2006. An Air Guide-1 analysis was conducted at that time using concentrations from a grab sample taken from the air stripper influent tank. The results indicated that based on continuous operation of the air stripper with a 45 gallons per minute (gpm) influent flow rate and at the specified concentration, the potential annual impacts for chloroform, methylene chloride, and benzene exceed their respective AGC's. However, the 45 gpm rate is a maximum instantaneous and the short term concentrations based on that flow were not exceeded for any contaminant of concern.

At the average (24-hour average) flow rate of 10 gpm to the stripper influent tank, the annual impacts were not exceeded. However, at 12 gpm, modeling showed the impacts approaching the AGC for chloroform and methylene chloride.

At the end of each calendar year, FMC shall determine the average annual flow rate and take a water grab sample for analysis from the stripper influent tank. If the extraction well yields increase and the average annual flow rate exceeds 12 gpm, or the influent concentrations increase from those in Table 1 of the May 11, 2006 letter, the ambient impacts are to be re-evaluated and submitted to this Department.

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Results of the sampling along with the average annual flow rate shall be submitted to this Department at 270 Michigan Avenue, Buffalo, NY 14202, at the end of each calendar year until it is determined that annual sampling is no longer required.

Parameter Monitored: FLOW RATE  
Upper Permit Limit: 12 gallons per minute  
Monitoring Frequency: ANNUALLY  
Averaging Method: 24-HOUR AVERAGE  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

