Facility DEC ID: 9563200007

# PERMIT Under the Environmental Conservation Law (ECL)

#### IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 9-5632-00007/00045

Effective Date: 12/05/2016 Expiration Date: 12/04/2026

Permit Issued To:MORTON SALT INC

45 RIBAUD AVE

SILVER SPRINGS, NY 14550

Contact: JAY G TANGEMAN

MORTON SALT PO BOX 342

SILVER SPRINGS, NY 14550-0342

(585) 493-2511

Facility: MORTON SALT INC

45 RIBAUD AVE E

SILVER SPRINGS, NY 14550

#### Description:

- (1) Morton Salt, Inc. produces, packages, and ships evaporated sodium chloride salt products from the facility located at 45 Ribaud Avenue, Silver Springs, New York.
- (2) This permit action is being completed to change the permit type from a Title V permit to an Air State Facility permit. This permit change can be completed because the facility emissions have been reduced below major source thresholds following conversion of the coal-fired boiler to a natural gas-fired boiler. A new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters replaced an existing 138 MMBtu/hr coal boiler and an existing 92.5 MMBtu/hr natural gas boiler.
- (3) Morton Salt must maintain the facility oxides of nitrogen (NOx) emission limit created during the netting analysis of the boiler conversion project. The total NOx emissions from Emission Unit M-BG003 including the 148 MMBtu/hr natural gas boiler and the eight (8) new direct fired building heaters shall not exceed 47.2 tons per year (tpy) NOx on a rolling 12-month basis.
- (4) Morton Salt must maintain the boiler conversion project permit conditions related to the netting analysis. Morton Salt used 7.5 tpy NOx Emission Reduction Credits (ERCs) during the netting analysis of the boiler conversion project that cannot be used again.
- (5) The new large boiler is subject to the relevant presumptive RACT emission limit of 0.06 pounds NOx per million Btu burning only natural gas. The 6NYCRR Part 227-2 NOx limit is achieved by the use of low NOx burners, flue gas recirculation and an oxygen trim system.



- (6) The new large boiler is subject to 40 CFR 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Morton Salt installed and operates a predictive emission monitoring system (PEMS) for measuring NOx and O2 (or CO2) emissions discharged to the atmosphere.
- (7) The new large boiler is subject to 40 CFR 63 Subpart DDDDD—National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters. For a new affected source, the first 5-year tune-up must be no later than 61 months after the initial startup of the new boiler. Each subsequent 5-year tune-up must be conducted no more than 61 months after the previous tune-up.

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: LISA M CZECHOWICZ

NYSDEC - REGION 9 270 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

Facility Level

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.

#### Item3.2:

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

#### **Item 3.3**

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



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

#### Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 9 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

#### Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 9 Headquarters Division of Environmental Permits 270 Michigan Avenue Buffalo, NY 14203-2915 (716) 851-7165



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Permit Under the Environmental Conservation Law (ECL)

### ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY

### **PERMIT**

### **IDENTIFICATION INFORMATION**

Permit Issued To:MORTON SALT INC 45 RIBAUD AVE SILVER SPRINGS, NY 14550

Facility: MORTON SALT INC

45 RIBAUD AVE E

SILVER SPRINGS, NY 14550

Authorized Activity By Standard Industrial Classification Code: 2899 - CHEMICAL PREPARATIONS, NEC

Permit Effective Date: 12/05/2016 Permit Expiration Date: 12/04/2026



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#### LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### **Facility Level**

- 1 6 NYCRR 211.1: Air pollution prohibited
- 2 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 3 6 NYCRR 212-2.4 (b): Compliance Demonstration

#### **Emission Unit Level**

#### EU=M-BG003

- 4 6 NYCRR 231-11.1: Compliance Demonstration
- 5 6 NYCRR 231-11.1: Compliance Demonstration
- 6 6 NYCRR 231-11.1: Compliance Demonstration
- 7 6 NYCRR Subpart 231-12: Compliance Demonstration

#### EU=M-BG003,Proc=BLR

- 8 6 NYCRR 227-1.3: Compliance Demonstration
- 9 6 NYCRR 227-2.4 (a) (1) (ii): Compliance Demonstration
- 10 6 NYCRR 227-2.6 (b): Compliance Demonstration
- 11 40CFR 60.44b, NSPS Subpart Db: Compliance Demonstration
- 12 40CFR 60.46b, NSPS Subpart Db: Compliance Demonstration
- 13 40CFR 60.48b, NSPS Subpart Db: Compliance Demonstration
- 14 40CFR 60.49b, NSPS Subpart Db: Compliance Demonstration
- 15 40CFR 60.49b(h), NSPS Subpart Db: Compliance Demonstration
- 16 40CFR 63.7500, Subpart DDDDD: Compliance Demonstration
- 17 40CFR 63.7515(d), Subpart DDDDD: Compliance Demonstration
- 18 40CFR 63.7540(a), Subpart DDDDD: Compliance Demonstration
- 19 40CFR 63.7550(c), Subpart DDDDD: Compliance Demonstration

# STATE ONLY ENFORCEABLE CONDITIONS Facility Level

- 20 ECL 19-0301: Contaminant List
- 21 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 22 6 NYCRR Subpart 201-5: Emission Unit Definition
- 23 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 24 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 25 6 NYCRR 211.2: Visible Emissions Limited

#### **Emission Unit Level**

- 26 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 27 6 NYCRR Subpart 201-5: Process Definition By Emission Unit



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# 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,



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required to operate such device effectively.

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

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

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

### Item E: Recycling and Salvage - 6 NYCRR 201-1.7

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

# Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

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

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

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

#### Item H: Proof of Eligibility for Sources Defined as Trivial



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### Activities - 6 NYCRR 201-3.3 (a)

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

#### Item I: Required Emission Tests - 6 NYCRR 202-1.1

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

#### Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

#### Item K: Permit Exclusion - ECL 19-0305

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

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

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

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

**Condition 1:** Air pollution prohibited

Effective between the dates of 12/05/2016 and 12/04/2026

**Applicable Federal Requirement: 6 NYCRR 211.1** 

#### Item 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:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

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

#### Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

#### Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

OPACITY LIMIT SALT PRODUCTION SOURCES



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- (1) No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except for the emission of uncombined water.
- (2) Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions whenever a process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation.
- (3) Records of the visible emission survey shall be maintained and be made available upon request.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION** 

Averaging Method: 6-MINUTE AVERAGE (METHOD 9) Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 3: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

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

#### Item 3.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

#### Item 3.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

PARTICULATE EMISSION LIMIT SALT PRODUCTION SOURCES

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require



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the performance of a Method 5 emissions evaluation at any time.

Parameter Monitored: PARTICULATES Upper Permit Limit: 0.05 grains per dscf Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

**DESCRIPTION** 

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

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

**Condition 4: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

**Applicable Federal Requirement:6 NYCRR 231-11.1** 

#### Item 4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Regulated Contaminant(s):

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

#### Item 4.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

NEW BOILER PROJECT MODIFICATION NETTING ANALYSIS PROJECT PTE EMISSION LIMIT OF 47.2 TPY NOx

- (1) The new boiler project includes conversion of the main power plant from coal to natural gas. A new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters will replace an existing 138 MMBtu/hr coal boiler and an existing 92.5 MMBtu/hr natural gas boiler.
- (2) The potential to emit (PTE) of combustion emissions from the new sources, alone, are as

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	PTE	THRESHOLD
NOx	47.2 tpy	40 tpy
SOx	0.4 tpy	40 tpy
PM	1.4 tpy	25 tpy
CO	61 tpy	100 tpy

- (3) NOx is the only contaminant exceeding the significant project threshold from §231-13.3 Table 3. Since the project PTE of 47.2 tpy NOx is greater than the significant project threshold of 40 tpy, a netting analysis was completed to avoid a New Source Review (NSR) major modification.
- (4) In accordance with §231-6.2, a net emission increase determination was completed based on the future shutdown of the existing coal and natural gas boilers. Emission Reduction Credits (ERCs) for the shutdown of these two sources were determined in accordance with §231-10.2 and quantified as the baseline actual emissions of the existing boilers. A baseline period of October 2012 through September 2014 was used. The baseline actual emissions were estimated based on NOx RACT emission levels of 0.2 lbs NOx/MMBtu for the coal boiler and 0.05 lbs NOx/MMBtu for the gas boiler. The ERCs created by the shutdown of the two boilers include 111.9 tpy NOx for the coal boiler and 0.4 tpy NOx from the gas boiler. The total amount of ERCs created is 112.3 tpy NOx.
- (5) The results of the netting analysis demonstrate the proposed modification does not result in a significant net emission increase since the projected PTE of the new project (47.2 tpy NOx) is less than the baseline actual emissions of 112.3 tpy NOx.
- (6) In accordance with §231-6.2(b)(1), a facility owner or operator which proposes a modification that does not result in a significant net emission increase, must apply for and obtain a permit which establishes an emission limit that equals the PTE of the modification of each nonattainment contaminant(s) which exceed(s) the applicable significant project threshold. As such, the total NOx emissions from Emission Unit M-BG003 including the 148 MMBtu/hr natural gas boiler and the eight (8) new direct fired building heaters shall not exceed 47.2 tpy NOx on a rolling 12-month basis.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 47.2 tons per year Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



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Reports due 30 days after the reporting period. The initial report is due 1/30/2017. Subsequent reports are due every 6 calendar month(s).

**Condition 5: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 6 NYCRR 231-11.1

#### Item 5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Regulated Contaminant(s):

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

#### Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW BOILER PROJECT MODIFICATION NETTING ANALYSIS SHAKEDOWN PERIOD

- (1) The new boiler project includes conversion of the main power plant from coal to natural gas. A new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters will replace an existing 138 MMBtu/hr coal boiler and an existing 92.5 MMBtu/hr natural gas boiler.
- (2) In order to avoid NNSR/PSD review for the new natural gas (NG) boiler and 8 building heaters, in Step 2 of the major modification NNSR/PSD applicability test, Morton proposes to use 7.5 tons of the 111.9 tpy NOx as actual emission reductions (ERC).
- (3) Decreases in actual emissions (or ERC) used in the netting must be contemporaneous with the particular modification.
- (4) Contemporaneous is defined as the period beginning five years prior to the scheduled commence construction date of the new or modified emission source, and ending with the scheduled commence operation date.
- (5) The commence operation or commencement of operation is defined as the date a proposed new or modified facility first emits or increases emissions of any regulated NSR

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contaminant; or the date on which the facility shakedown period ends for a proposed modified facility which utilizes future ERC for netting.

- (6) In order to ensure the 7.5 tons of NOx, used by Morton as actual emission decreases (ERC), will occur within the contemporaneous period, the shutdown of the existing coal-fired boiler (EU: M-BC001) must occur prior to the commencement of operation date, as the term is defined in 6NYCRR 231-4.1(b) (12), of the new NG boiler and 8 new NG building heaters (EU: M-BG003). The facility must maintain and submit appropriate records to the NYSDEC for demonstrating compliance with this applicable requirement.
- (7) The facility is allowed a shakedown period that should meet all applicable provisions of 6NYCRR 231-3.8. The facility must maintain and submit appropriate records to the NYSDEC for demonstrating compliance with this applicable requirement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

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

**Condition 6: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 6 NYCRR 231-11.1

#### Item 6.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Regulated Contaminant(s):

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

#### Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

NEW BOILER PROJECT MODIFICATION NETTING ANALYSIS ERC USEAGE OF 7.5TPY NOx



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- (1) The new boiler project includes conversion of the main power plant from coal to natural gas. A new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters will replace an existing 138 MMBtu/hr coal boiler and an existing 92.5 MMBtu/hr natural gas boiler.
- (2) The potential to emit (PTE) of combustion emissions from the new sources, alone, are as follows:

	PTE	THRESHOLD
NOx	47.2 tpy	40 tpy
SOx	0.4 tpy	40 tpy
PM	1.4 tpy	25 tpy
CO	61 tpy	100 tpy

- (3) NOx is the only contaminant exceeding the significant project threshold from §231-13.3 Table 3. Since the project PTE of 47.2 tpy NOx is greater than the significant project threshold of 40 tpy, a netting analysis was completed to avoid a New Source Review (NSR) major modification. The results of the netting analysis demonstrate the proposed modification does not result in a significant net emission increase.
- (4) In accordance with §231-6.2(b)(2), a facility owner or operator which proposes a modification that does not result in a significant net emission increase must apply for and obtain a permit which establishes the ERCs relied on for the net emission increase determination, if the ERCs are not already approved by the department.
- (5) Morton Salt used 7.5 tpy NOx ERCs to reduce the project PTE below the significant net emission increase of 40 tpy NOx. The resulting total quantity of ERCs remaining after the netting analysis is 104.8 tpy NOx.
- (6) As specified in §231-10.1(h), an ERC, or portion thereof, which was used to avoid a determination of a significant net emission increase, cannot subsequently be used as an internal offset, emission offset, or in any subsequent netting determinations. Therefore, the 7.5 tpy NOx ERCs used in the netting analysis cannot be used again.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 7.5 tons per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION
Averaging Method: ANNUAL TOTAL

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

Reports due 30 days after the reporting period. The initial report is due 1/30/2017. Subsequent reports are due every 6 calendar month(s).

**Condition 7: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 6 NYCRR Subpart 231-12

#### Item 7.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Regulated Contaminant(s):

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

#### Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

# NEW BOILER PROJECT MODIFICATION AIR QUALITY MODELING ANALYSIS

- (1) An air quality impact analysis was completed for this project. The purpose of the analysis was to determine the potential impact of the new project relative to the 1-hour nitrogen dioxide (NO2) National Ambient Air Quality Standard (NAAQS) and annual PSD increment consumption for NO2.
- (2) Maximum annual NO2 impacts fell well below the significance level of 1 ug/m3.
- (3) Cumulative modeling was required for the 1-hour averaging period to incorporate impacts from nearby facilities. The maximum impact of 33.7 ug/m3 fell well below the NAAQS of 188 ug/m3, even after adding the conservative background value from Amherst, NY of 100.2 ug/m3.
- (4) No further reporting or monitoring is required for this condition.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026



Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

### Applicable Federal Requirement: 6 NYCRR 227-1.3

#### Item 8.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

#### Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW GAS BOILER §227-1.3 Opacity

- (1) No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.
- (2) The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

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

#### Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 9.2:

Compliance Demonstration shall include the following monitoring:

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Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM) Monitoring Description:

### NEW 148 MMBTU/HR GAS BOILER NOx RACT EMISSION LIMIT

- (1) The new large boiler will comply with the relevant presumptive RACT emission limit of 0.06 pounds NOx per million Btu burning only natural gas. The NOx limit will be achieved by the use of low NOx burners, flue gas recirculation and an oxygen trim system.
- (2) Compliance with the presumptive RACT emission limit will be demonstrated by the installation and operation of a NOx CEMS that meets the requirements of 40 CFR 60.48b(b)(1) and 6 NYCRR 227-2.6(b).

Manufacturer Name/Model Number: CEMS NOx Analyzer

Parameter Monitored: OXIDES OF NITROGEN Upper Permit Limit: 0.06 pounds per million Btus

Reference Test Method: CEMS/40 CFR 60 Monitoring Frequency: CONTINUOUS Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 10:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:6 NYCRR 227-2.6 (b)

#### Item 10.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM) Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER CEMS REQUIREMENTS



### New York State Department of Environmental Conservation Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

- (1) The owner or operator of an emission source that monitors NOx emissions with a CEMS or equivalent monitoring system must submit for department approval:
- (i) a CEMS plan as part of its application for a permit or permit modification if a CEMS has already been installed, or if a CEMS is in the process of being procured or installed;
- (ii) a CEMS plan at least 180 days prior to equipment installation. The department will notify the owner or operator of the acceptability of the plan, at least 60 days prior to equipment installation if it is not covered under subparagraph (i) of this paragraph; or
- (iii) a proposed plan for a monitoring system that is equivalent to a CEMS.
- (2) The owner or operator of an emission source that monitors NOx emissions with a CEMS must submit for department approval a CEMS certification protocol at least 60 days prior to compliance testing. The certification protocol must include the location of and specifications for each instrument or device, as well as procedures for calibration, operation, data evaluation, and data reporting.
- (3) The owner or operator of an emission source that monitors NOx emissions with a CEMS must install, calibrate, maintain, and operate a CEMS for measuring NOx at locations approved in the CEMS certification protocol under paragraph (2) of this subdivision, and must record the output of each such system. The following procedures and test methods must be used for determining compliance with the relevant NOx emission limit under section 227-2.4 of this Subpart:
- (i) With the exception of emission sources subject to paragraph (a)(4) of this section, the owner or operator of an emission source must:
- (a) calculate all 24-hour daily heat input-weighted average NOx emission rates from block hourly arithmetic emission rate averages calculated by the CEMS and expressed in terms of pounds of NOx per million Btu:
- (b) demonstrate compliance with the appropriate emission limit under section 227-2.4 of this Subpart by using a CEMS for measuring NOx and calculating a 24-hour daily heat input-weighted average NOx emission rate. Facilities that are subject to 40 CFR part 75 will calculate their



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NOx emission rate using part 75 monitoring requirements. Facilities that are not subject to 40 CFR part 75 may calculate their NOx emission rate using either 40 CFR part 60, appendix A, method 19 or 40 CFR part 75. A 30-day rolling heat input-weighted average emission rate may be used to demonstrate compliance with the appropriate emission limit under section 227-2.4 of this Subpart from October 1st to April 30th for emission sources other than combustion turbines; and

- (c) determine the 24-hour daily heat input-weighted average NOx emission rate based on the heat input-weighted average of the block hourly arithmetic average emission rates during each 24-hour daily period from 12:00 AM to 12:00 AM the following day using CEMS data. The block hourly heat input-weighted average emission rate must be calculated for each one-hour period starting with the period 12:00 AM to 1:00 AM and continuing through until the last period 11:00 PM to 12:00 AM; or, starting with the period 12:00 PM to 1:00 PM and continuing through the last period 11:00 AM to 12:00 PM. The 30-day rolling heat input-weighted average must be the average of the 24-hour daily heat input-weighted NOx emission rate.
- (ii) The owner or operator of an emission source subject to paragraph (a)(4) of this section must calculate:
- (a) block hourly arithmetic average emission rates using data points generated by CEMS and expressed in terms of parts per million on a dry volume basis, corrected to 15 percent oxygen; and
- (b) block hourly arithmetic average emission rates for the periods starting 12:00 AM to 1:00 AM, 1:00 AM to 2:00 AM, and so on.
- (iii) At a minimum, valid CEMS data must be obtained for 90 percent of the operating hours in each calendar quarter that the subject facility is operating.
- (iv) All valid CEMS data must be used in calculating emission rates even if the minimum data requirements of subparagraph (iii) of this paragraph are not met.
- (v) The procedures under 40 CFR part 60, appendix B, Performance Specification 2; and any additional criteria specified by the department must be followed for the installation, evaluation, and operation of the CEMS.
- (vi) Along with any specific additional data requirements mandated by the department for a particular



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emission source, annual recertifications, quarterly accuracy, and daily calibration drift tests must be performed in accordance with 40 CFR part 60, appendix F or 40 CFR part 75, as applicable.

- (vii) When NOx emissions data are not obtained because of CEMS downtime, emission data shall be obtained by using the 90th percentile value of all CEMS NOx emission data collected over the last 180 days. Alternatively the owner or operator of a facility subject to part CFR 75 may use 40 CFR part 75 data substitution procedures for periods when no valid CEMS data is available.
- (4) CEMS recordkeeping and reporting requirements.
- (i) The owner or operator of an emission source must notify the department of the planned initial start-up date of any new CEMS.
- (ii) Protocols, reports, summaries, compliance plans and schedules, and any other information required to be submitted to the department under provisions of this Subpart must be sent (in either hardcopy or electronically) as follows:
- (a) one copy to the Division of Air Resources, New York State Department of Environmental Conservation, 625 Broadway, Albany, NY 12233; and
- (b) one copy to the regional air pollution control engineer at the appropriate regional office of the department.
- (iii) Emissions, monitoring, and operating parameter records or measurements required by this Subpart, quarterly and annual summaries, and any additional parameters required by the department must be maintained for at least five years and made available to the department upon request.
- (iv) Following each calendar quarter, the owner or operator must tabulate and summarize applicable emissions, monitoring, and operating parameter measurements recorded during the preceding three months (including but not limited to type and amount of fuel burned on a daily basis, heat content of the fuel, total heating value of the fuel consumed on a daily basis, the actual NOx emission rate, the allowable NOx emission rate, and the summation of the emission sources included in a system averaging plan). These records must be submitted to the department within 30 days following the end of each calendar quarter in a format acceptable to the department

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and must include:

- (a) the average NOx emission rates as specified under paragraph (3) of this subdivision. (With the exception of emission sources subject to paragraph (a)(4) of this Section, emission sources are to record and tabulate block hourly average emission rates, but do not need to included the block hourly average emission rates in the quarterly summaries);
- (b) identification of the operating hours when NOx emissions data are not included in the calculation of the average emission rate and the reasons for not including that data; and
- (c) the results of accuracy assessments as required by 40 CFR part 60, appendix F and any additional data quality information required by the department.
- (v) The owner or operator of an emission source must submit the initial compliance test data, the performance evaluation of the CEMS found in 40 CFR part 60, appendix B, and the maximum heat input capacity.

Manufacturer Name/Model Number: CEMS NOx Analyzer

Parameter Monitored: OXIDES OF NITROGEN Upper Permit Limit: 0.06 pounds per million Btus Reference Test Method: CEMS/40 CFR 60

Monitoring Frequency: CONTINUOUS Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 3 calendar month(s).

#### **Condition 11: Compliance Demonstration**

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:40CFR 60.44b, NSPS Subpart Db

#### Item 11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 11.2:

Compliance Demonstration shall include the following monitoring:



Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM) Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER §60.44b - STANDARD FOR NITROGEN OXIDES (NOx)

§60.44b(a): No owner or operator of an affected facility that is subject to the provisions of this section and that combusts only natural gas shall cause to be discharged into the atmosphere from that affected facility any gases that contain NOx (expressed as NO2) in excess of the following emission limits:

Fuel type NOx emission limits (expressed as NO2) heat

input

ng/J

lb/MMBtu Natural gas

(i) Low heat release rate 43 0.10

(ii) High heat release rate 86

0.20

§60.44b(h): The NOx standards under this section apply at all times including periods of startup, shutdown, or malfunction.

§60.44b(i): Compliance with the emission limits under this section is determined on a 30-day rolling average basis.

Manufacturer Name/Model Number: CEMS NOx Analyzer

Parameter Monitored: OXIDES OF NITROGEN Upper Permit Limit: 0.1 pounds per million Btus Reference Test Method: CEMS/40 CFR 60 Monitoring Frequency: CONTINUOUS

Averaging Method: 30-DAY ROLLING AVERAGE Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 12:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:40CFR 60.46b, NSPS Subpart Db

#### Item 12.1:

The Compliance Demonstration activity will be performed for:



Permit ID: 9-5632-00007/00045 Facility DEC ID: 9563200007

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER §60.46b - COMPLIANCE AND PERFORMANCE TEST METHODS AND PROCEDURES FOR NITROGEN OXIDES (NOx)

§60.46b(a): The NOx emission standards under §60.44b apply at all times.

§60.46b(c): Compliance with the NOx emission standards under §60.44b shall be determined through performance testing under paragraph (e).

§60.46b(e)(1)&(4): To determine compliance with the emission limits for NOx required under §60.44b, the owner or operator of an affected facility shall conduct the performance test as required under §60.8 using the continuous system for monitoring NOx under §60.48(b).

- (1) For the initial compliance test, NOx from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the NOx emission standards under §60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.
- (4) Following the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, the owner or operator of an affected facility that has a heat input capacity of 73 MW (250 MMBtu/hr) or less and that combusts natural gas, distillate oil, gasified coal, or residual oil having a nitrogen content of 0.30 weight percent or less shall upon request determine compliance with the NOx standards in §60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, NOx emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling

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average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NOx emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NOx emission data for the preceding 30 steam generating unit operating days.

Manufacturer Name/Model Number: CEMS NOx Analyzer

Monitoring Frequency: CONTINUOUS

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 13:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:40CFR 60.48b, NSPS Subpart Db

#### Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER §60.48b EMISSION MONITORING FOR NITROGEN OXIDES (NOx)

§60.48b(b)(1): Install, calibrate, maintain, and operate CEMS for measuring NOx and O2 (or CO2) emissions discharged to the atmosphere, and shall record the output of the system.

§60.48b(c): The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

§60.48b(d): The 1-hour average NOx emission rates measured

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by the continuous NOx monitor shall be expressed in ng/J or lb/MMBtu heat input and shall be used to calculate the average emission rates under §60.44b. The 1-hour averages shall be calculated using the data points required under §60.13(h)(2).

§60.48b(e): The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems.

§60.48b(e)(2)(i): The NOx span values for natural gas is 500 ppm.

§60.48b(f): When NOx emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A of this part, Method 7A of appendix A of this part, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

§60.48b(g): The owner or operator of an affected facility that has a heat input capacity of 73 MW (250 MMBtu/hr) or less, and that has an annual capacity factor for residual oil having a nitrogen content of 0.30 weight percent or less, natural gas, distillate oil, gasified coal, or any mixture of these fuels, greater than 10 percent (0.10) shall:

- (1) Comply with the provisions of paragraphs (b), (c),
- (d), (e)(2), (e)(3), and (f) of this section; or
- (2) Monitor steam generating unit operating conditions and predict NOX emission rates as specified in a plan submitted pursuant to \$60.49b(c).

Manufacturer Name/Model Number: CEMS NOx Analyzer

Monitoring Frequency: CONTINUOUS

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 14:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:40CFR 60.49b, NSPS Subpart Db

#### Item 14.1:

The Compliance Demonstration activity will be performed for:



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Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER §60.49b REPORTING AND RECORDKEEPING REQUIREMENTS

§60.49b(a): The owner or operator of each affected facility shall submit notification of the date of initial startup, as provided by §60.7. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility;
- (3) The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired:

§60.49b(b): The owner or operator of each affected facility subject to the NOx emission limits under §§60.44b shall submit to the Administrator the performance test data from the initial performance test and the performance evaluation of the CEMS using the applicable performance specifications in appendix B of this part.

§60.49b(c): The owner or operator of each affected facility subject to the NOX standard in §60.44b who seeks to demonstrate compliance with those standards through the monitoring of steam generating unit operating conditions in the provisions of §60.48b(g)(2) shall submit to the Administrator for approval a plan that identifies the operating conditions to be monitored in §60.48b(g)(2) and the records to be maintained in §60.49b(g). This plan shall be submitted to the Administrator for approval within 360 days of the initial startup of the affected facility. If the plan is approved, the owner or operator shall maintain records of predicted nitrogen oxide emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan. The plan shall:

(1) Identify the specific operating conditions to be



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monitored and the relationship between these operating conditions and NOX emission rates (i.e., ng/J or lbs/MMBtu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas O2 level);

(2) Include the data and information that the owner or operator used to identify the relationship between NOX emission rates and these operating conditions; and (3) Identify how these operating conditions, including steam generating unit load, will be monitored under \$60.48b(g) on an hourly basis by the owner or operator during the period of operation of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the owner or operator under \$60.49b(g).

§60.49b(d)(1): The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 15:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 40CFR 60.49b(h), NSPS Subpart Db

#### Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

Regulated Contaminant(s):

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

#### Item 15.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER §60.49b REPORTING AND RECORDKEEPING REQUIREMENTS

§60.49b(h)(2)(ii): The owner or operator is required to submit excess emission reports for any excess emissions that occurred during the reporting period. If there are no excess emissions during the reporting period, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during that semiannual reporting period.

§60.49b(h)(4): For purposes of §60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average NOX emission rate, as determined under §60.46b(e), that exceeds the applicable emission limits in §60.44b.

Monitoring Frequency: SEMI-ANNUALLY Reporting Requirements: SEMI-ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2017. Subsequent reports are due every 6 calendar month(s).

**Condition 16:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 40CFR 63.7500, Subpart DDDDD

### Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

#### Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER § 63.7500 WORK PRACTICE STANDARDS

§63.7500(a)(1): You must meet the work practice standard in Table 3, Item 1, as follows:

For a new boiler with a continuous oxygen trim system that maintains an optimum air to fuel ratio and is designed to burn gas 1, you must conduct a tune-up of the boiler every 5 years as specified in § 63.7540.

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§63.7500(a)(3): At all times, you must operate and maintain any affected source (as defined in § 63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

§63.7500(f): These standards apply at all times the affected unit is operating, except during periods of startup and shutdown during which time you must comply only with Table 3 to this subpart.

Monitoring Frequency: Once every five years

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 17: Compliance Demonstration** 

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 40CFR 63.7515(d), Subpart DDDDD

#### Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

#### Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER § 63.7515(d) 5 YEAR TUNE-UP

You must conduct a 5-year performance tune-up according to § 63.7540(a)(12). Each 5-year tune-up specified in § 63.7540(a)(12) must be conducted no more than 61 months after the previous tune-up. For a new affected source (as defined in § 63.7490), the first 5-year tune-up must be no later than 61 months after the initial startup of the new boiler.

Monitoring Frequency: Once every five years

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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**Condition 18:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement: 40CFR 63.7540(a), Subpart DDDDD

#### Item 18.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

#### Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

NEW 148 MMBTU/HR GAS BOILER § 63.7540 CONTINUOUS COMPLIANCE WITH WORK PRACTICE STANDARDS

§63.7540(a)(12): If your boiler has a continuous oxygen trim system that maintains an optimum air to fuel ratio and the unit is designed to burn gas 1, you must conduct a tune-up of the boiler every 5 years as specified in paragraphs (i) through (vi) to demonstrate continuous compliance. You may delay the burner inspection specified in paragraph (i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months.

- (i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- (iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the



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inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

- (iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NOX requirement to which the unit is subject;
- (v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- (vi) Maintain on-site and submit, if requested by the Administrator, an annual report containing the information in paragraphs (vi)(A) through (C) of this section,
- (A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
- (B) A description of any corrective actions taken as a part of the tune-up; and
- (C) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

Monitoring Frequency: Once every five years

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

#### **Condition 19: Compliance Demonstration**

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable Federal Requirement:40CFR 63.7550(c), Subpart DDDDD

#### Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: M-BG003

Process: BLR

#### Item 19.2:



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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

> NEW 148 MMBTU/HR GAS BOILER § 63.7550 REPORTING

§ 63.7550(b): For units that are subject only to a requirement to conduct a 5-year tune-up according to § 63.7540(a)(12) and not subject to emission limits or operating limits, you may submit only a 5-year compliance report as specified in paragraphs (1) through (4), instead of a semi-annual compliance report.

- (1) The first compliance report must cover the 5 year period after the compliance date that is specified for your source in § 63.7495.
- (2) The first 5-year compliance report must be postmarked or submitted no later than January 31.
- (3) 5-year compliance reports must cover the 5-year periods from January 1 to December 31.
- (4) Each subsequent 5-year compliance reports must be postmarked or submitted no later than January 31.
- § 63.7550(c): A compliance report must contain the following information:
- (i) Company and Facility name and address.
- (ii) Process unit information, emissions limitations, and operating parameter limitations.
- (iii) Date of report and beginning and ending dates of the reporting period.
- (iv) The total operating time during the reporting period.
- (v) Include the date of the most recent tune-up for each unit subject to only the requirement to conduct a 5-year tune-up according to § 63.7540(a)(12). Include the date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.

Monitoring Frequency: Once every five years

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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

#### NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

#### Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) An emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;
- (3) During the period of the emergency the facility owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



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Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

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

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

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

# STATE ONLY APPLICABLE REQUIREMENTS The following conditions are state only enforceable.

**Condition 20:** Contaminant List

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable State Requirement: ECL 19-0301

#### Item 20.1:

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

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

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Condition 21: Malfunctions and start-up/shutdown activities

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable State Requirement: 6 NYCRR 201-1.4

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#### Item 21.1:

- (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 under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 22:** Emission Unit Definition

Effective between the dates of 12/05/2016 and 12/04/2026

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

#### Item 22.1:

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

Emission Unit: M-BG003 Emission Unit Description:

Emission Unit M-BG003 includes a new natural gas 148 MMBtu/hr steam boiler and eight (8) small direct fired building heaters.

The installation of this emission unit is expected to

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begin in September, 2015. This emission unit replaces the existing 138 MMBtu/hr coal boiler and the existing 92.5 MMBtu/hr natural gas boiler.

Building(s): 1

#### Item 22.2:

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

Emission Unit: M-BR004 Emission Unit Description:

Emission Unit M-BR004 includes bulk loading of salt (NaCl) into rail cars.

Building(s): 33

#### Item 22.3:

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

Emission Unit: M-ML005 Emission Unit Description:

Emission unit M-ML005 includes the bulk storage, screening, blocking, packaging, and bulk truck loading of salt (NaCl) products.

Building(s): 36

#### Item 22.4:

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

Emission Unit: M-PH006 Emission Unit Description:

Emission Unit M-PH006 includes wet dust collectors used in capturing salt (NaCl) dust from screw conveyors, belt conveyors, bucket elevators, screeners, silos, and rotary conditioner.

Building(s): 32 37

#### Item 22.5:

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

Emission Unit: M-PT003 Emission Unit Description:

Emission Unit M-PT003 includes the production and packaging of briquetted salt (NaCl) as a water conditioning recharge product. The system includes briquetting presses, screw conveyors, bucket elevators, screeners, packaging equipment, and dust collector.

Building(s): 33

Condition 23: Renewal deadlines for state facility permits
Effective between the dates of 12/05/2016 and 12/04/2026



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

#### Item 23.1:

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 24:** Compliance Demonstration

Effective between the dates of 12/05/2016 and 12/04/2026

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

#### Item 24.1:

The Compliance Demonstration activity will be performed for the Facility.

#### Item 24.2:

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 25:** Visible Emissions Limited

Effective between the dates of 12/05/2016 and 12/04/2026

**Applicable State Requirement: 6 NYCRR 211.2** 

#### Item 25.1:

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.

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

Condition 26: Emission Point Definition By Emission Unit Effective between the dates of 12/05/2016 and 12/04/2026



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

#### Item 26.1:

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

Emission Unit: M-BG003

Emission Point: 00028

Height (ft.): 70 Diameter (in.): 48

NYTMN (km.): 4726.8 NYTME (km.): 739.3 Building: 1

Item 26.2:

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

Emission Unit: M-BR004

Emission Point: 00025

Height (ft.): 64 Diameter (in.): 24

NYTMN (km.): 4727.352 NYTME (km.): 247.605 Building: 33

Item 26.3:

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

Emission Unit: M-ML005

Emission Point: 00002

Height (ft.): 60 Diameter (in.): 36

NYTMN (km.): 4727.42 NYTME (km.): 247.529 Building: 36

Emission Point: 00008

Height (ft.): 56 Diameter (in.): 21

NYTMN (km.): 4727.416 NYTME (km.): 247.624 Building: 8

Emission Point: 00009

Height (ft.): 54 Length (in.): 24 Width (in.): 36 NYTMN (km.): 4727.31 NYTME (km.): 247.557 Building: 36

Item 26.4:

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

Emission Unit: M-PH006

Emission Point: 00003

Height (ft.): 27 Length (in.): 12 Width (in.): 36 NYTMN (km.): 4727.391 NYTME (km.): 247.622 Building: 37

Emission Point: 00005

Height (ft.): 66 Diameter (in.): 24

NYTMN (km.): 4727.397 NYTME (km.): 247.64 Building: 32

Emission Point: 00010

Height (ft.): 27 Length (in.): 12 Width (in.): 36

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NYTMN (km.): 4727.407 NYTME (km.): 247.618 Building: 37

Emission Point: 00014

Height (ft.): 69 Diameter (in.): 18

NYTMN (km.): 4727.366 NYTME (km.): 247.579 Building: 32

Item 26.5:

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

Emission Unit: M-PT003

Emission Point: 00026

Height (ft.): 59 Diameter (in.): 34

NYTMN (km.): 4727.369 NYTME (km.): 247.596 Building: 33

**Condition 27:** Process Definition By Emission Unit

Effective between the dates of 12/05/2016 and 12/04/2026

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 27.1:

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

Emission Unit: M-BG003

Process: BLR Source Classification Code: 1-03-006-01

Process Description:

Process BLR includes a new 148 MMBtu/hr natural gas fired boiler - Cleaver Brooks Model NB-401D-90 industrial watertube boiler. The boiler utilizes low NOx burners, flue gas recirculation and an oxygen trim system.

Emission Source/Control: G0006 - Combustion Design Capacity: 148 million Btu per hour

Item 27.2:

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

Emission Unit: M-BG003

Process: HTR Source Classification Code: 1-05-001-06

**Process Description:** 

Process HTR includes eight (8) new direct fired building

heaters.

Emission Source/Control: HV001 - Combustion Design Capacity: 1.9 million Btu per hour

Emission Source/Control: HV002 - Combustion Design Capacity: 3 million Btu per hour

Emission Source/Control: HV003 - Combustion Design Capacity: 4.5 million Btu per hour



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Emission Source/Control: HV004 - Combustion

Design Capacity: 3 million Btu per hour

Emission Source/Control: HV005 - Combustion Design Capacity: 1.9 million Btu per hour

Emission Source/Control: HV006 - Combustion

Design Capacity: 3 million Btu per hour

Emission Source/Control: HV007 - Combustion

Emission Source/Control: HV008 - Combustion Design Capacity: 1.5 million Btu per hour

#### Item 27.3:

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

Emission Unit: M-BR004

Process: 007 Source Classification Code: 3-05-021-03

Process Description:

Process 007 includes the collection of salt (NaCl) dust from bulk railcar loading. The salt is removed from the air stream by a wet venturi scrubber. The effluent is recycled in the process system. Clean air is exhausted to the atmosphere.

Emission Source/Control: BRC07 - Control

Control Type: WET SCRUBBER

Emission Source/Control: BR007 - Process

#### Item 27.4:

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

Emission Unit: M-ML005

Process: 008 Source Classification Code: 3-05-021-01

Process Description:

Process 008 is the collection of salt (NaCl) dust from the salt handling equipment including screw conveyors, belt conveyors, bucket elevators, screeners, block press, and packaging equipment. The salt is removed from the air stream in a dry bag house. The salt is collected, dissolved, and returned to the manufacturing process The clean air is exhausted to the atmosphere.

Emission Source/Control: MLC08 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MLC10 - Control

Control Type: FABRIC FILTER

Emission Source/Control: MLC11 - Control



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Control Type: FABRIC FILTER

Emission Source/Control: ML008 - Process

Emission Source/Control: ML010 - Process

Emission Source/Control: ML011 - Process

#### Item 27.5:

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

Emission Unit: M-PH006

Process: 010 Source Classification Code: 3-05-021-01

Process Description:

Process 010 is the collection of salt (NaCl) dust from screw conveyors, scalping screens, belt conveyors, bucket elevators, storage silos, and rotary conditioner (unfired rotary kiln, ambient air). The effluent is recycled in the process system. The clean air is exhausted to the atmosphere.

Emission Source/Control: WCC13 - Control

Control Type: IMPINGEMENT PLATE SCRUBBER

Emission Source/Control: WCC14 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: WCC15 - Control

Control Type: IMPINGEMENT PLATE SCRUBBER

Emission Source/Control: WCC16 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: WC013 - Process

Emission Source/Control: WC014 - Process

Emission Source/Control: WC015 - Process

Emission Source/Control: WC016 - Process

#### Item 27.6:

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

Emission Unit: M-PT003

Process: 006 Source Classification Code: 3-05-021-01

**Process Description:** 

Process 006 is the collection of salt (NaCl) dust collected from pellet production equipment including: briquetters, screw conveyors, screeners, bucket elevators, bins, and packaging equipment. The salt is removed from the air stream by a wet venturi scrubber. The effluent is



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recycled in the process system. Clean air is exhausted to the atmosphere.

Emission Source/Control: PTC06 - Control

Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: PT006 - Process