New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 9-1464-00031/00292
Renewal Number: 2
01/31/2019

Facility Identification Data
Name: E I DUPONT YERKES PLANT
Address: 3115 RIVER RD
BUFFALO, NY 14207

Owner/Firm
Name: DUPONT SPECIALTY PRODUCTS USA, LLC
Address: 974 CENTRE RD
WILMINGTON, DE 19805, USA
Owner Classification: Corporation/Partnership

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project
The DuPont Yerkes site contains two independent businesses: Corian(R) and Tedlar (R). NAICS codes 326113 and 326191. This permit is the renewal of the Title V permit. Several notable additions to the permit follow:
-Integration of previous permit modifications such as applicability of the Federal Miscellaneous Organic NESHAP (MON), and upgrade of the Tedlar Thermal oxidizer.
-Dupont has committed to reduce vinyl fluoride emissions from the facility to meet the toxic exposure guideline values in 6 NYCRR part 212. Conditions for vinyl fluoride are listed under 201-7.
-A RACT variance is being approved for several sources due to unreasonable cost to control emissions. These sources are also regulated by the MON and no control is designated under the federal rule because of low concentration.
-A new pigment system and cold solvent bath subject to NESHAP subpart T has been included.
-A small boiler subject to the NESHAP, subpart DDDDD has been included.
Emissions from the additional sources are minor.

Attainment Status
E I DUPONT YERKES PLANT is located in the town of TONAWANDA in the county of ERIE.
The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status

Particulate Matter (PM)	ATTAINMENT
Particulate Matter< 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	MARGINAL NON-ATTAINMENT
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.
** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:
The Dupont Yerkes site contains two independent businesses.: Corian(R) and Tedlar (R). NAICS codes 326113 and 326191. Corian and Tedlar are manufactured at this facility.

Permit Structure and Description of Operations
The Title V permit for E I DUPONT YERKES PLANT
is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:
combustion - devices which burn fuel to generate heat, steam or power
incinerator - devices which burn waste material for disposal
control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

E I DUPONT YERKES PLANT is defined by the following emission unit(s):

Emission unit 000001 - Emission Unit 0-00001 includes a mold injection line for the production of Corian(R) shape products. The mold injection line is identified as Corian(R) Closed Mold Casting (CCMC). Molds are conditioned in a pre-conditioning tunnel. After filling, the molds move through a heat tunnel and then to an unload station. The mold is opened and the product removed. The product is sent to a finishing area. There are four processes associated with this emission unit. The processes include: 001- Manufacture of Corian(R) Closed Mold Casting (VOC sources); 01A- Insignificant activities involved in the manufacture of Corian(R) Closed Mold Castings; 01B-VOC process vessels greater than 750 gallons; and 01C- Manufacture of Corian(R) Closed Mold Casting (particulate sources).

Emission unit 000001 is associated with the following emission points (EP):
00032, 00097, 00099, 00121, 00163, 00165, 00200, 0031A
Process: 001 is located at CCMC, Building 300 - Process 001 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Closed Mold Casting (CCMC). The manufacturing process consists of combining methyl methacrylate with an inorganic filler and minor amounts of other chemicals. The material is then injected into molds and allowed to harden. The molds are opened, the sinks removed and sent to the finishing area.

Process: 01A is located at CCMC, Building 300 - Process 01A includes the insignificant activities associated with the manufacturing of Corian(R) Closed Mold Casting (CCMC). The sources include the preheat tunnel, curing tunnel, and other maintenance and storage areas.

In addition, this process includes "process vessels" which are used primarily for pigments. DuPont utilizes many small (i.e., less than 750 gallon) "process vessels" in the production process. The quantity and location of the small process vessels is continuously changing. As such, the small vessels have not been listed below. Instead, as per 6NYCRR Part 201-6.4(f), DuPont is required to maintain a site inventory to identify the number and location of the small process vessels.

Process: 01B is located at CCMC, Building 300 - VOC storage tanks associated with the Manufacture of Corian(R) Closed Mold Casting (CCMC)

Process: 01C is located at CCMC, Building 300 - Process 01C includes sources which emit particulate emissions during the manufacture of Corian(R) Closed Mold Casting (CCMC).

Emission unit 000002 - Emission unit 0-00002 is identified as Corian(R) Sheet Line #1. Corian is cast as a sheet. The sheet is trimmed, cut, and finished. There are four processes associated with this emission unit: 002- Manufacture of Corian(R) Sheet Line #1 (VOC Sources); 02A- Insignificant activities associated with Corian(R) Sheet Line #1; 02B-VOC process vessels greater than 750 gallons capacity; and, 02C - Manufacture of Corian(R) Sheet Line #1 (particulate sources).

Emission unit 000002 is associated with the following emission points (EP):
00007, 00008, 0007A, 00120, 00130, 00134, 00135, 00137, 00139, 00172, 00180, 00195, 00198, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00221, 00243, 00254, 00255, 00259, 00268
Process: 002 is located at Corian Sheet Line #1, Building 200 - Process 002 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Sheet Line #1. The manufacturing process consists of combining methyl methacrylate with an inorganic filler, pigment and initiator. The mixture is spread on the casting belt where the continuous sheet is allowed to polymerize and cool.

Process: 020 is located at Building 200 - Baghouse associated with the Sheetline #1. It is a source of particulate emissions.

Process: 02A is located at Corian Sheet Line #1, Building 200 - Process 02A includes the insignificant activities associated with the manufacturing of Corian(R) Sheet Line #1.

In addition, this process includes "process vessels"which are used primarily for pigments, additives and chemicals. DuPont utilizes many small (i.e., less than 750 gallon) "process vessels" in the production process. The quantity and location of the small process vessels is continuously changing. As such, the small vessels have not been listed below. Instead, as per 6NYCRR Part 201-6.4(f), DuPont is required to maintain a site inventory to identify the number and location of the small process vessels.

Process: 02B is located at Corian Sheet Line #1, Building 200 - VOC storage tanks associated with the Manufacture of Corian(R) Sheet Line #1

Process: 02C is located at Corian Sheet Line #1, Building 200 - Process 02C includes sources which emit particulate emissions during the manufacture of Corian(R) Sheet Line #1.

Emission unit 000003 - Emission unit 0-00003 is identified as Corian(R) Sheet Line #2. Corian is cast as a sheet. The sheet is trimmed, cut, and finished. There are four processes associated with this emission unit: 003- Manufacture of Corian(R) Sheet Line #2 (VOC Sources); 03A- Insignificant activities associated with Corian(R) Sheet Line #2; 03B- VOC process vessels greater than 750 gallons; and, 03C - Manufacture of Corian(R) Sheet Line #2 (particulate sources).

Emission unit 000003 is associated with the following emission points (EP):
00054, 00055, 00056, 00057, 00058, 00059, 00100, 00109, 00115, 00116, 00140, 00141, 00158, 00159, 00160, 00167, 00253, 00257
Process: 003 is located at Corian Sheet Line #2, Building 100 - Process 003 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Corian(R) Sheet Line #2. The manufacturing process consists of combining methyl methacrylate with an inorganic filler, pigment and initiator. The mixture is spread on the casting belt where the continuous sheet is allowed to polymerize and cool. This process also includes a batch cold degreaser and associated methylene chloride emissions.

Process: 03A is located at Corian Sheet Line #2, Building 100 - Process 03A includes the insignificant activities associated with the manufacturing of Corian(R) Sheet Line #2. The sources include: 2nd floor additives, tower, procedyne, essiential materials, PMA, and in-line trim saw.

In addition, this process includes "process vessels" which are used primarily for pigments, additives and chemicals. DuPont utilizes many small (i.e., less than 750 gallon) "process vessels" in the production process. The quantity and location of the small process vessels is continuously changing. As such, the small vessels have not been listed below. Instead, as per 6NYCRR Part 201-6.4(f), DuPont is required to maintain a site inventory to identify the number and location of the small process vessels.

Process: 03B is located at Corian Sheet Line #2, Building 100 - VOC storage tanks associated with the Manufacture of Corian(R) Sheet Line #2

Process: 03C is located at Corian Sheet Line #2, Building 100 - Process 03C includes sources which emit particulate emissions during the manufacture of Corian(R) on Sheet Line #2.

Emission unit 000004 - Emission unit 0-00004 is identified as the Corian(R) Sirup Process. During this process methyl methacrylate (cas # 80-62-6) is partially polymerized to polymethyl methacrylate (cas # 9011-14-7) in a continuous reactor. The sirup is stored for use in storage tanks. There is one process associated with this emission unit: - 04A- Insignificant activities associated with Corian(R) Sirup.

Emission unit 000004 is associated with the following emission points (EP):
00136, 00161
Process: 04A is located at Corian(R) Sirup, Building siruptower - Process 04A includes the insignificant activities associated with the manufacturing of Corian(R) Sirup. The sources include the sirup tower.

In addition, this process includes "process vessels" which are used primarily for pigments. DuPont utilizes many small (i.e., less than 750 gallon) "process vessels" in the production process. The quantity and location of the small process vessels is continuously changing. As such, the small vessels have not been listed below. Instead, as per 6NYCRR Part 201-6.4(f), DuPont is required to maintain a site inventory to identify the number and location of the small process vessels.

Emission unit 000005 - Emission unit 0-00005 is identified as Corian(R) Raw Materials. This emission unit includes the storage of materials for the manufacturing process. There are two processes associated with this emission unit: - 05B- VOC storage tanks associated with the Corian(R) Raw Materials Area, and 05C - particulate sources.

Emission unit 000005 is associated with the following emission points (EP):
00015, 00021, 00024, 00053, 00133, 00149, 00150, 00151, 00152
Process: 05A is located at Corian Raw Materials, Building RAW MAT. - Process 05A includes the insignificant activities associated with the manufacturing of Corian(R) Raw Materials Area.

Process: 05B is located at Corian Raw Materials, Building RAW MAT. - Process 05B includes VOC storage tanks associated with the manufacture of Corian(R) Raw Materials Area. This process includes five (5) VOC tanks with a capacity greater than 750 gallons which have been listed below in this permit.

Process: 05C is located at Corian Raw Materials, Building RAW MAT. - Process 05C includes sources which emit particulate emissions from the Corian Raw Materials Area.

Emission unit 000006 - Emission unit 0-00006 includes: (1) Research & Development , (2) Maintenance, and (3) Quality Laboratory Testing activities. These activites may be classified as exempt sources under 6 NYCRR Part 201-3.3; however, some sources may have an applicable requirement and associated monitoring. Thus, only the sources which are subject to an applicable requirement have been identified in the permit. However, emissions from all the exempt activities are included in the facility emission calculations.

There are three processes associated with this emission unit including: 06A-insignificant activities, 06B - storage tanks, and 06C- particulate sources.

Emission unit 000006 is associated with the following emission points (EP):
00114, 00199, 00215, 00264

Process: 06A is located at Building 100 - Process 06A includes the insignificant activities associated with the activities in: (1) Research & Development, (2) Maintenance, and (3) Quality Laboratories.

Process: 06C is located at Building 100 - Process 06C includes sources which emit particulate emissions from: (1) Research & Development, (2) Maintenance, and (3) Quality Laboratories.

Emission unit 000008 - Emission unit 0-00008 is identified as Tedlar(R) Polymer. Vinyl fluoride, produced off-site, is polymerized and the polymer is decanted, filtered, and dried. There are three processes associated with this emission unit including: 008- VOC sources, 08A- insignificant activities, and 08C-particulate sources.

Emission unit 000008 is associated with the following emission points (EP):
00005, 00020, 00030, 00107, 00125, 00126, 00183, 00184, 00185, 00186, 00260
Process: 008 is located at Tedlar(R) Polymer, Building 4140 - Process 008 includes the sources which result in volatile organic compound (VOC) emissions during the Tedlar(R) Polymer Process. This polymerization process begins with vinyl fluoride and uses a reactor to convert it to a slurry of polyvinyl fluoride, vinyl fluoride, and water. The slurry passes to high and low pressure separators and a flash tank. The slurry is then filtered, mixed with air, and heated in dryers. A baghouse separates the entrained air and water vapor from the polyvinyl fluoride. The polyvinyl fluoride is
packaged for distribution or stored.

Process: 08A is located at Tedlar (R) Polymer, Building 4140 - Process 08A includes the insignificant activities associated with the manufacturing of Tedlar(R) Polymer.

Process: 08C is located at Tedlar Polymer, Building 4140 - Process 08C includes sources which emit particulate emissions during the Tedlar Polymer Process.

Emission unit 000009 - Emission unit 0-00009 is identified as Tedlar(R) Oriented Line #1. Polymerized vinyl flouride is combined with dimethyl acetamide (cas # 127-19-5) and additives. The mixture is extruded through a die and stretched to form a film as the dimethyl acetamide is removed. The film is wound onto mill rolls. There are four processes associated with this emission unit: - 009- Manufacture of Tedlar(R) - Oriented Line #1 which includes mix tanks; - 09A- Insignificant activities associated with Tedlar(R) - Oriented Line #1; 09B- VOC storage tanks associated with the Manufacture of Tedlar(R) - Oriented Line #1, and 09C - particulate sources.

Emission unit 000009 is associated with the following emission points (EP):
00002, 00003, 00011, 00016, 00017, 00018, 00019, 00022, 00023, 0002A, 0003A, 0004A, 0004B, 00110, 00112, 00117, 00122, 00123, 00124, 00128, 00129, 00147, 00148
Process: 009 is located at Oriented Line #1, Building TEDLAR(R) - Process 009 includes the sources which result in volatile organic compound (VOC) emissions during the manufacturing of Tedlar(R) - Oriented Line #1. The Tedlar mixture (dimethylacetamide, pigments and additives) is extruded through a die to produce a sheet of Tedlar film. The film is cooled in a quench tank and enters a five zone oven to be heated, cooled, and upon exit is wound on rollers.

Process: 09A is located at Oriented Line #1, Building TEDLAR(R) - Process 09A includes the insignificant activities associated with Tedlar(R) - Oriented Line #1. The activites include a chipper, the chip room exhaust, the mix room exhaust, and the corona treating discharge.

Process: 09B is located at Oriented Line #1, Building TEDLAR(R) - Process 09B includes VOC storage tanks associated with the manufacture of Tedlar(R) - Oriented Line #1. This process includes eight (8) VOC tanks with a capacity of greater than 750 gallons which have been listed in the permit.

Process: 09C is located at Building TEDLAR(R) - Process 09C includes sources which emit particulate emissions during the Tedlar Process.

Emission unit 000010 - Emission unit 0-00010 is identified as the Tedlar(R) SP Line. A mixture of polymerized vinyl fluoride and additives are coated onto a continuous carrier web. The film is cured and the web may, or may not, be removed. There is one process associated with this emission unit: - 010- Manufacture of Tedlar(R) - SP Line.

Emission unit 000010 is associated with the following emission points (EP):
00157, 00166, 00252, 00258
Process: 010 is located at oriental line 1, Building TEDLAR(R) - Process 010 includes the sources which result in volatile organic compound (VOC) emissions from the manufacture of Tedlar(R) - SP Line. A variety of film products may be produced by this coating process. Additionally, this process may use a variety of raw materials that have the same applicable requirements. The emission rate potential and potential to emit information for this process was determined on a compound by compound basis. This was determined by taking the product with the largest potential to emit a given compound and then the potential to emit was estimated assuming the product was produced 8760 hours per year.

Emission unit 000261 - Emission unit is described as a backup diesel compressor used to generate compressed air when one of four main electrically powered compressors are down for maintenance.

Emission unit 000261 is associated with the following emission points (EP):
00261
Process: 261 is located at Building outside - Emergency generator

Title V/Major Source Status
E I DUPONT YERKES PLANT is subject to Title V requirements. This determination is based on the following information:
Dupont is a major source of Volatile Organic Compound Emissions (VOC) and Hazardous Air Pollutnats (HAP) emissions. Predominant emissions are Methyl Methacrylate, Dimethyl Acetamide and Vinyl Fluoride. Methy Methacrylate is a VOC and listed as one of 189 HPAs under the Clean Air Act of 1990.

Program Applicability
The following chart summarizes the applicability of E I DUPONT YERKES PLANT with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability

PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:
PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status
Facility is in compliance with all requirements.

SIC Codes
SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
3081	UNSUPPORTED PLASTICS FILM AND SHEET
3088	PLASTICS PLUMBING FIXTURES

SCC Codes
SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
2-02-001-02	INTERNAL COMBUSTION ENGINES - INDUSTRIAL INDUSTRIAL INTERNAL COMBUSTION ENGINE - DISTILLATE OIL(DIESEL) Reciprocating
3-01-018-08	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Monomer and Solvent Storage
3-01-018-09	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruder
3-01-018-10	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Conveying
3-01-018-14	CHEMICAL MANUFACTURING

	CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Extruder
3-01-018-17	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION General
3-01-018-18	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Reactor
3-01-018-22	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PLASTICS PRODUCTION Acrylic Resins
3-08-010-07	RUBBER AND MISCELLANEOUS PLASTICS PRODUCTS RUBBER AND MISC PLASTIC PRODUCTS - PLASTIC PRODUCTS MANUFACTURING PLASTIC PRODUCTS MFG: MOLDING MACHINE
4-02-021-40	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - FLATWOOD PRODUCTS SURFACE PREPARATION (INCL. TEMPERING,SANDING,BRUSHING,GROVE CUT)
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000872-50-4	1-METHYL-2-PYRROLIDONE				
000108-10-1	2-PENTANONE, 4-METHYL				
000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER				
000141-32-2	2-PROPENOIC				

	ACID, BUTYL ESTER		
000097-88-1	2-PROPENOIC ACID,2-METHYL-,1-BUTYL ESTER		
003290-92-4	2-PROPENOIC ACID,2-METHYL-,2-ETHYL-2-[[(2-METHYL-1-OXO-2-PRO		
000123-86-4	ACETIC ACID, BUTYL ESTER		
000123-81-9	ACETIC ACID, MERCAPTO-,1,2-ETHANEDIYL ESTER		
064741-84-0	ALIPHATIC NAPTHA		
000630-08-0	CARBON MONOXIDE		
000108-32-7	CARBONIC ACID, CYCLIC PROPYLENE ESTER		
000075-45-6	CHLORODIFLUORO-METHANE		
000075-09-2	DICHLOROMETHANE		
000067-64-1	DIMETHYL KETONE		
000075-02-5	ETHENE, FLUORO	15000	15000
000056-81-5	GLYCEROL		
000067-63-0	ISOPROPYL ALCOHOL		
000078-93-3	METHYL ETHYL KETONE		
000057-55-6	METHYLETHYL GLYCOL		
000127-19-5	N,N-DIMETHYL-ACETAMIDE		
0NY210-00-0	OXIDES OF NITROGEN		
010028-15-6	OZONE		
0NY075-00-0	PARTICULATES		
000127-18-4	PERCHLOROETHYLENE		
001931-62-0	PEROXYMALEATE, TERT-BUTYL		
007664-38-2	PHOSPHORIC ACID		
0NY075-00-5	PM-10		
000074-98-6	PROPANE		
000577-11-7	SODIUM DIOCTYL SULFOSUCCINATE C20H38O7S.NA		
000100-42-5	STYRENE		
007446-09-5	SULFUR DIOXIDE		
0NY100-00-0	TOTAL HAP		

000079-01-6	TRICHLOROETHYLENE
0NY998-00-0	VOC
001330-20-7	XYLENE, M, O & P MIXT.
000557-05-1	ZINC STEARATE

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)
The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

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

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

Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)
This Title V permit shall be reopened and revised under any of the following circumstances:

i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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_02

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	75	Powers and Duties of the Department with respect to air pollution control
0-00261	40CFR 63-A	62	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63-A.7	32	Performance Testing Requirements

FACILITY	40CFR 63-FFFF	33	National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
0-00003/00055	40CFR 63-FFFF.2450(a)	43	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - General Requirements
FACILITY	40CFR 63-FFFF.2450(c)(2	34	Miscellaneous Organic Chemical Mfg NESHAP - Combined Emission Streams
FACILITY	40CFR 63-FFFF.2480	35	Miscellaneous Organic Chemical Manufacturing NESHAP (MON) - Equipment leak provisions
0-00002	40CFR 63-FFFF.2520	42	Miscellaneous Organic Chemical Mfg NESHAP - Reporting
0-00010	40CFR 63-JJJJ.3330(a)	50	Compliance date for existing affected sources.
0-00010/00258	40CFR 63-JJJJ.3350(e)	56	Paper and Other Web Coating NESHAP - monitoring for a non-catalytic oxidizer
0-00010	40CFR 63-JJJJ.3350(f)	51	Paper and Other Web Coating NESHAP - Monitoring of capture systems
0-00010/00258	40CFR 63-JJJJ.3360(e)	57	Paper and Other Web Coating NESHAP - Performance tests to determine control device efficiency
0-00010/00258	40CFR 63-JJJJ.3360(f)	58	Paper and Other Web Coating NESHAP - Determination of capture efficiency
0-00010/00258	40CFR 63-JJJJ.3370(e)	59	Paper and Other Web Coating NESHAP - Compliance Demonstration - 95/98% control option
0-00010/-/010/S0258	40CFR 63-JJJJ.3370(g)	55	Paper and Other Web Coating NESHAP - compliance demonstration - mass fraction limit option
0-00010/00258/010/S0258	40CFR 63-JJJJ.3370(k)(1	60, 61	Initial compliance demonstration of capture and control device efficiency.
0-00010	40CFR 63-JJJJ.3400(c)	52	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report
0-00010	40CFR 63-JJJJ.3400(g)	53	Paper and Other Web Coating NESHAP -

			reporting - startup/shutdown/malfunction reports
0-00003/00058/003/S0058	40CFR 63-T.462(a)(2)	44	Subpart T - Requirements for immersion batch cold solvent cleaning machines
0-00003/00058/003/S0058	40CFR 63-T.468(c)	45	Subpart T- Reporting requirements
FACILITY	40CFR 63-ZZZZ	36	Reciprocating Internal Combustion Engine (RICE) NESHAP
0-00261/00261	40CFR 63-ZZZZ.6600(b)	65	Reciprocating Internal Combustion Engine (RICE) NESHAP - Emission limits and operating limits for new lean burn engines
0-00261/00261	40CFR 63-ZZZZ.6605(a)	66	Reciprocating Internal Combustion Engine (RICE) NESHAP - compliance
0-00261/00261	40CFR 63-ZZZZ.6610(a)	67	Reciprocating Internal Combustion Engine (RICE) NESHAP - Dates for Initial Compliance Demonstrations
FACILITY	40CFR 63-ZZZZ.6620(b)	37	Reciprocating Internal Combustion Engine (RICE) NESHAP - performance tests
0-00261/00261	40CFR 63-ZZZZ.6625(a)	68	Reciprocating Internal Combustion Engine (RICE) NESHAP - installation of continuous emission monitoring system (CEMS)
0-00261/00261	40CFR 63-ZZZZ.6625(b)	69	Reciprocating Internal Combustion Engine (RICE) NESHAP - installation of continuous parameter monitoring system (CPMS)
0-00261	40CFR 63-ZZZZ.6630(a)	63	Reciprocating Internal Combustion Engine (RICE) NESHAP - Initial Compliance Demonstration
0-00261/00261	40CFR 63-ZZZZ.6640	70	Reciprocating Internal Combustion Engine (RICE) NESHAP - Compliance Requirements
0-00261/00261	40CFR 63-ZZZZ.6650(b)	71	Reciprocating Internal Combustion Engine (RICE) NESHAP - reporting schedule
0-00261/00261	40CFR 63-ZZZZ.6650(c)	72	Reciprocating Internal Combustion Engine (RICE) NESHAP - contents of

			compliance reports
0-00261/00261	40CFR 63-ZZZZ.6650(d)	73	Reciprocating Internal Combustion Engine (RICE) NESHAP - deviation reports
0-00261/00261	40CFR 63-ZZZZ.6650(e)	74	Reciprocating Internal Combustion Engine (RICE) NESHAP - deviation reporting contained in compliance reports
FACILITY	40CFR 63-ZZZZ.6650(f)	38	Reciprocating Internal Combustion Engine (RICE) NESHAP - Title V and NESHAP reporting
0-00261	40CFR 63-ZZZZ.6650(h)	64	Reciprocating Internal Combustion Engine (RICE) NESHAP - emergency engine demand response reporting
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.3	21	False Statement.
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	76	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 39, 40	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4(c)(3)(ii	5	Reporting Requirements - Deviations and

FACILITY	6NYCRR 201-6.4(d)(4)	23	Noncompliance Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(1)	24	Operational Flexibility - Alternate Operating Scenarios
FACILITY	6NYCRR 201-6.4(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-7	41	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	25	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212.10	29	NOx and VOC RACT required at major facilities
0-00009/0002A/009/K002B	6NYCRR 212.11(b)(4)	48	Sampling and monitoring
0-00009/0002A/009/K002A	6NYCRR 212.11(b)(5)	47	Sampling and monitoring
0-00009/0004A/009/K004A	6NYCRR 212.11(b)(5)	49	Sampling and monitoring
FACILITY	6NYCRR 212.4(c)	26, 27	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	28	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 229.3(e)(2)(iv)	30	Volatile organic liquid storage tanks
FACILITY	6NYCRR 229.3(e)(2)(v)	31	Volatile organic liquid storage tanks

Applicability Discussion:
Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301
This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7
Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and

procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4
This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)
An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)
The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6
This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)
This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)
This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)
This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)
This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)
This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)
This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)
Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (f) (6)
This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6 NYCRR 202-1.1
This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

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.

40 CFR Part 68
This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F
Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements
In addition to Title V, E I DUPONT YERKES PLANT has been determined to be subject to the following regulations:
40 CFR 63.2450 (a)
40 CFR 63 .2430 thru 63.2550 refer to 40 cfr part 63, subpart FFFF, NESHAP for Miscellaneous Organic Chemical Manufacturing (MON) .This regulation required evaluating every source of HAP emissions and calculating Total Resource Effectiveness (TRE) value to determe if any additional monitoring or controls are required. The evaluation resulted in the control of emissions from the two corian casting pools with a Regenerative Thermal Oxidizer. In, addition the facility must perform Leak Detection and Repair (LDAR) for HAPequipment in service.The control equipment became operational by July 2010. Mehtyl Methacrylate is the only HAP at Dupont that is applicable to this regulation.

63.2450(a) contains the requirments for Stack Tsting vent 55 per the EPA consent order 1:13-cv-00810-WMS. This vent is for the uncontrolled emissions in corian sheel line 2.

40 CFR 63.2450 (c) (2)

This condition specifies the minimium operating temperature, record keeping and reporting requirements for the control equipment, the Regenerative Thermal Oxidizer controlling emissions from corian sheet

line pools #1 and #2, as required by the MON regulation.

40 CFR 63.2480

This section of the rule requires Leak Detection And Repair (LDAR) monitoring for all equipment leak components in "HAP" service. The 9/29/2009 initial compliance report identifies the affected process units, number of each equipment type, method of compliance with the standard, and planned schedule per 40 cfr 63.1039(a)(1)(i) thru (iv).

40 CFR 63.2520

This section of the rule details the compliance reporting requirements.

40 CFR 63.3330 (a)

The Tedlar line is subject to 40 cfr 63 subpart JJJJ, National Emission Standards for Hazardous air pollutants (NESHAP), Paper and other web coating. Compliance Date was December 5, 2005

40 CFR 63.3350 (e)

If the facility is using a non-catalytic oxidizer to comply with the emission limits in §63.3320, the facility must install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications.

40 CFR 63.3350 (f)

If the facility is complying with the emission limits in §63.3320 through the use of a capture system and control device for one or more coating lines, the facility must develop a site-specific monitoring plan

40 CFR 63.3360 (e)

Dupont is using an add-on control device to comply with the emission standards in §63.3320, the facility must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in §63.3360(e)(1) and (2).

40 CFR 63.3360 (f)

The regulation requires the facility must determine capture efficiency once.

40 CFR 63.3370 (e)
The facility must operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month per the regulation.

40 CFR 63.3370 (g)

option in the regulation if the facility chooses to comply with the 0.04 kg organic HAP emitted/kg coating material applied limit as listed in §63.3320(b)(2), the facility must operate a capture system and control device to meet the limit on a monthly average as-applied basis.

40 CFR 63.3370 (k) (1)
The rule stipulates a minimum operating temperature for the oixdizer of 800C (1472F) with a 3 hour temperature average period. Temperature is continuouisly recorded. The low set point is 1480F and when tripped will stop the web coating line operation.

40 CFR 63.3400 (c)
The regulation stipulates what must be included in thea semiannual compliance reports.

40 CFR 63.3400 (g)
The regulation requires the submission of startup, shutdown, and malfunction reports.

40 CFR 63.462 (a) (2)
This paragraph states that a tight fitting cover and a freeboard ratio of at least 0.75 must be used to minimize solvent loss unless complying with paragraph (a)(1) of this section.

40 CFR 63.468 (c)
This reference provides the compliance report requirements for batch cold solvent cleaning machines which are subject to this subdivision. For existing units, this report should have been submitted to the EPA within 150 days of the compliance date. For new units, this report must be submitted to the EPA within 150 days of startup or May1, 1995, whichever is later.

40 CFR 63.6600 (b)
This condition lists the emission limits and operating limits that a new or reconstructed engine that is 2-stroke lean burn, 4-stroke lean burn, or compression ignition reciprocating internal combustion engine (RICE) must meet.

The engine must meet either the concentration listed for the specific type of engine listed in table 2a or reduce the amount of formaldehyde being emitted from the engine by the percentage listed.

If the engine is using non-selective catalytic reduction to reduce the emission of formaldehyde from the engine, then the facility must monitor the pressure drop and temperature of the catalyst bed and keep it

within a certain range of what was measured during the performance test that the facility had to do to prove it was meeting the limits listed above for formaldehyde.

40 CFR 63.6605 (a)
This condition states that the facility must meet all emission limits and operating limits that this rule imposes at all times.

40 CFR 63.6610 (a)
This condition reduces emissions of hazardous air pollutants by requiring the owner or operator of a stationary RICE with a site rating of more than 500 brake horsepower located at a major source of HAP emissions to conduct a performance test proving that the engine(s) meet the emission limits in this rule within 180 days of the date that the facility must be in compliance.

40 CFR 63.6620 (b)
This condition reduces emissions of hazardous air pollutants by specifying which methods the facility must use in order to measure the amount of pollutants that are being emitted from the engine(s). This condition also lists other specifics that ensure that the measurements are correct, and this condition specifies how often the tests must be performed.

40 CFR 63.6625 (a)
This condition reduces the emission of hazardous air pollutants by providing specific regulations on how the facility operates and maintains any continuous emission monitoring systems (CEMS). The facility must meet the requirements in 40 CFR 63.8 to ensure that the monitoring systems are reading the correct information and that the engine(s) are continuously meeting the emission limits in this rule.

40 CFR 63.6625 (b)
This condition reduces the emission of hazardous air pollutants by providing specific regulations on how the facility operates and maintains any continuous parameter monitoring systems (CPMS). The facility must meet the requirements in 40 CFR 63.8 to ensure that the monitoring systems are reading the correct information and that the engine(s) are continuously meeting the emission limits in this rule.

40 CFR 63.6630 (a)
This condition reduces the emissions of hazardous air pollutants from reciprocating internal

combustion engines (RICE) by listing what the facility has to do to prove that it was initially meeting the emission limits listed in this rule.

The facility must conduct a performance test to measure the emissions of pollutants during normal engine operation, and either install a device to continuously measure these emissions or measure parameters which are representative of what the emissions would be during operation of the engine. Then this information must be submitted to the NYSDEC so that DEC can tell from the compliance reports whether the emission limits are being met.

40 CFR 63.6640
This condition reduces the emissions of hazardous air pollutants from reciprocating internal combustion engines (RICE) by listing what the facility has to do to prove that it is continuously meeting the emission limits listed in this rule.

When the facility conducted the performance test to measure the emissions of pollutants during normal engine operation, the facility had to either install a device to continuously measure these emissions or measure parameters which are representative of what the emissions would be during operation of the engine. Then this information must be submitted to the NYSDEC so that DEC can tell from the compliance reports whether the emission limits are being met.

40 CFR 63.6650 (b)
This regulation sets forth the reporting requirements for the owner or operators of stationary internal combustion engines at facilities with emissions of hazardous air pollutants.

40 CFR 63.6650 (c)
This condition lists what the facility needs to submit with the semiannual compliance report required in this rule.

40 CFR 63.6650 (d)
This condition lists what the facility needs to submit when a deviation occurs with respect to requirements in this rule.

40 CFR 63.6650 (e)
This condition lists what information the facility needs to submit for each deviation from an emission limit or operating limit.

40 CFR 63.6650 (f)

This condition states when information in the compliance report required by the NESHAP can be used for the semiannual monitoring report required for Title V.

40 CFR 63.6650 (h)

This condition states the reporting requirements for emergency engines that operate for demand response.

40 CFR 63.7

Section 63.7 covers performance testing requirements such as default notification and test deadlines; quality assurance programs; site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Deadlines (unless overridden by individual MACT rule): Performance test required within 180 days after compliance date of applicable NESHAP for an existing source. Applicant must submit a site specific performance test protocol within 60 days of test. Applicant must report results of performance test including analysis of samples, raw data and emissions determination within 60 days after each test is completed.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that descibe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

40 CFR Part 63, Subpart FFFF

This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous organic chemical manufacturing and is known as the MON MACT rule. The rule includes emission limits, operating limits and work practice standardards for applicable equipment identified under the rule as miscellaneous organic process units (MCPU).

40 CFR Part 63, Subpart ZZZZ

Statement that the facility must comply with the Recipricating Internal Combustion engine rule to minimimize HAP emissions.

6 NYCRR 200.3
No person shall make a false statement in connection with applications, plans, specifications and/or reports submitted pursuant to this Subchapter.

6 NYCRR 201-6.4 (f) (1)
This permit condition shall specify the conditions under which operational flexibility can be performed at the facility.

6 NYCRR 211.1
This regulation requires that 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.

6 NYCRR 212.10
This section describes the Reasonably Available Control Technology (RACT) requirements for emissions of oxides of nitrogen and/or volatile organic compounds from major facilities. Dupont has submitted a RACT plan for specific sources, listed in the permit, that justifies no control because of cost. This plan is approved by the State and will be submitted as a State implementation Plan revision for EPA approval.

6 NYCRR 212.11 (b) (4)
The regulation requires monitoring of outlet temperature from refrigerated condnesers to insure the control equipment is functioning properly. This emission source described in under this regulation is equipped with a refrigerated condenser with continuous temperature monitor and data recording for the outlet gas temperature. Continuous monitors must be operated at all times when the associated process equipment is operating except during any quality assurance and routine maintenance activities.

6 NYCRR 212.11 (b) (5)
This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources using continuos monitors.

6 NYCRR 212.4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 229.3 (e) (2) (iv)
This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap for Vinyl Fluoride emissions from the facility to meet the Division of Air Guidance document DAR1 for protection of public health. Dupont is making process changes to reduce emissions to meet the annual Guidline concnetration in DAR1.

Compliance Certification
Summary of monitoring activities at E I DUPONT YERKES PLANT:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	33	record keeping/maintenance procedures
0-00003/00055	43	record keeping/maintenance procedures
FACILITY	34	monitoring of process or control device parameters as surrogate
FACILITY	35	record keeping/maintenance procedures
0-00002	42	record keeping/maintenance procedures
0-00010/00258	56	monitoring of process or control device parameters as surrogate
0-00010	51	record keeping/maintenance procedures
0-00010/00258	57	record keeping/maintenance procedures
0-00010/00258	58	record keeping/maintenance procedures
0-00010/00258	59	record keeping/maintenance procedures
0-00010/-/010/S0258	55	record keeping/maintenance procedures
0-00010/00258/010/S0258	60	monitoring of process or control device parameters as surrogate
0-00010/00258/010/S0258	61	intermittent emission testing
0-00010	52	record keeping/maintenance procedures
0-00010	53	record keeping/maintenance procedures
0-00003/00058/003/S0058	44	record keeping/maintenance procedures
0-00261/00261	65	intermittent emission testing
0-00261/00261	69	record keeping/maintenance procedures
0-00261	63	record keeping/maintenance procedures
0-00261/00261	70	record keeping/maintenance procedures
0-00261	64	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	24	record keeping/maintenance procedures

0-00008	46	monitoring of process or control device parameters as surrogate
0-00010/-/010	54	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	29	record keeping/maintenance procedures
0-00009/0002A/009/K002B	48	monitoring of process or control device parameters as surrogate
0-00009/0002A/009/K002A	47	monitoring of process or control device parameters as surrogate
0-00009/0004A/009/K004A	49	monitoring of process or control device parameters as surrogate
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	30	record keeping/maintenance procedures
FACILITY	31	record keeping/maintenance procedures

Basis for Monitoring
6 NYCRR Part 212
The facility is subject to 6 NYCRRpart 212 for particulate emissions. Specific conditions for particulate include observation of opacity and monitoring of control equipment were applicable. The predominant control type used by Dupont for large sourcs of particulate is a baghouse and routine maintenance, monitoring of pressure drop across the baghouse, and routinely checking opacity insures complaince with the standards.

6 NYCRR Part 212-10
The facility emits greater than 50 tons per year VOC and is therfore also subject to 6 NYCRR part 212-10, Resonable Available Control Technology (RACT) for VOC emissions at emission points emitting greater than 3 pounds per hour. This portion of the regulation requires a minium capture and control of VOC emissions to be greater than 81% if cost is less than $3000 per ton based on 1997 dollars. Three sources are controlled under this regulation, 5 are not because of cost.
Emission Unit 0-00009, Emission Point 0002A ,Process 009, Emission Source K002B,
This emission source is equipped with a refrigerated condenser with continuous temperature monitor and data recording for the outlet gas temperature to control Dimethyl acetamide (DMAc) emissions. The solvent is recycled.
The Tedlar bead trim scrubber , emission unit 9, Emission point 4A, uitlizes a scrubber to remove DMAc per the requirements of 6NYCRR part 212-10. . Tedlar polyvinyl fluoride film is extruded and dried in an oven. The edge of the film is gripped by clips which prevent complete drying. The bead trim is collected, chipped and dried to remove the residual solvent, n, n-dimethylacetamide (DMA) DMAc is readily miscible with water producing high scrubber efficiencies. The average removal efficiency during the test the jan 26, 2012 performance test was 99.97%. The third source is emission unit 9, emission point 2A and is called the extruder and orienting line scrubber. It is the same technology as the bead trim scrubber. Water flow alarms and measuring DMAc in scrubber solution are used to monitor performance of the scrubbers. Only, n,n-dimethylacetamide (DMA) emissions is of concern because vinyl fluoride is already polymerized prior to use.
The 5 sources not controlled because of cost are: vents 7 and 221 (emissions not vented to control vent oout EP 7 and 221 in Corian sheet line 1), evaluated as one source; vent 55 (emissions not vented to control in sheet line 2) , vent 200 (room exhaust for filling and purge hoods for CCMC); vent 2, 3, and 3A (external exchaust for Tedla oriental film), evaluated as one source; and vent 5, (Vinyl Fluoride flash tank).

Details are included in the RACT plan.
Vinyl Fluoride (VF) emissions from the facility were evaluated for compliance with the Departments guidance document to protect public health Division of Air Resources policy document-DAR1, "Guidelines for the Control of Toxic Ambient Air Contaminants. The evaluation resulted in planned reduction of VF emissions thru process improvements to meet the annual guidline concentration for VF. 6NYCRR part 201-7 limits annual emissions of VF to 25000 pounds per year beginning January 1, 2015 and 15000 pounds per pear beginning January 1, 2016. Process monitoring and annual sampling will confirm compliance. Vent 5, regulated under 6 NYCRR part 212-10 as a VOC, is a source of VF emissions.

40 CFR part 63 subpart FFFF
In addition the facility is subject to MON

Some sources are subject to the Miscelaneous Organic NESHAP and monitoring is specified according to the rule. Other control equipment have monitoring conditions reflecting proper operation and maintenace and insuring compliance with the control requirements to emission limits.