



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. James Coutant, P.E.

Regional Air Pollution Control Engineer, Division of Air Resources

NYSDEC, Region 5

232 Golf Course Rd., Warrensburg, NY 12885

Re: Draft title V Operating Permit Renewal Hollingsworth & Vose Co
Permit ID # 5-5326-00004/00049, Easton, Washington County, NY

Dear Mr. Coutant:

Thank you for the opportunity to comment on the draft renewal title V operating permit for the Hollingsworth & Vose Co ("Hollingsworth or facility") that the New York State Department of Environmental Conservation Region 5 office (NYSDEC) issued for a 30-day public review on June 2, 2021. We reviewed the draft permit and permit review report (PRR) and have identified several concerns regarding the draft permit. To ensure that the draft permit complies with New York's approved title V Operating Permit Program, NYSDEC's air regulations and applicable Clean Air Act (CAA) requirements, and that the permit record adequately supports the NYSDEC's permit decision, EPA recommends that the NYSDEC address the following:

1. **Lack of Practical Enforceability for NO_x and SO₂ Emission Caps** - Conditions 25 and 27 of the draft permit cite to 6 NYCRR Part 201-7 to establish limits on the facility-wide potential to emit (PTE) of NO_x and SO₂ for the purpose of avoiding the applicability of 6 NYCRR Parts 227-2 and 231-2 and 40 CFR § 52.21. The above-mentioned conditions do not specify the emission sources covered under the two emission caps. Further, neither the two conditions nor other draft permit conditions include requirements for measuring and monitoring NO_x and SO₂ emissions resulting from the emissions sources at the facility. Instead, the two conditions simply require that the facility calculate the actual monthly NO_x and SO₂ emissions based on the amount of fuels combusted (i.e., residual fuel oil and natural gas) multiplied by some NO_x and SO₂ emission factors (perhaps AP-42 emission factors for boilers) corresponding to each type of fuel. Please address the following:
 - a. The above-mentioned conditions as well as Condition 26 (also cites to 6 NYCRR Part 201-7 regarding the NO_x and SO₂ emission caps) should specify all of the emission sources at the facility that are covered under the emission caps in order for the caps to be enforceable. Based on our review, such sources include two boilers fired on residual fuel oil and natural gas, natural gas heating units and dryers used in the manufacturing processes, and emergency engines referenced in the PRR).
 - b. In order for the two emission caps to be practically enforceable, the draft permit should require periodic testing for NO_x and SO₂ emissions from the two boilers, and potentially for other NO_x and SO₂ emission sources at the facility. Otherwise, the PRR should include the rationale for not requiring periodic testing for NO_x and SO₂ emissions for such emission sources at the facility.

- 2. Missing Applicable Requirements – 40 CFR 63 Subpart ZZZZ National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (NESHAP 4Z)** - As specified at CAA §§504(a) and (c), 40 CFR §70.6, and 6 NYCRR 201-6.4, each title V permit must include all emission limitations and standards, as well as operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. The permit must also include all necessary testing, monitoring, recordkeeping, and reporting requirements to demonstrate compliance with the emission limitations. As discussed below, the draft permit fails to include requirements from the NESHAP 4Z that apply to the emergency engines at the facility.

Based on the information found in the “Basis for Monitoring” section on page 32 of 33 of the PRR¹, although there are emergency engines at the facility, which are subject to NESHAP 4Z, the NESHAP 4Z requirements were not included in the draft permit because “...the NYS emergency engine definition is more stringent...” First, we note that while NESHAP 4Z (as well as NSPS 4J and 4I) does not limit the number of hours for emergency operation, it has more specific criteria for classifying an engine as an emergency engine. Such criteria define what constitutes an emergency and limit maintenance checks and readiness testing to 100 hours per calendar year. Within those 100 hours, 50 hours are for prescribed non-emergency uses. NESHAP 4Z contains specific compliance requirements for emergency engines; not complying with those requirements disqualifies the engine as an emergency engine under NESHAP 4Z. Thus, NYS’ definition for an emergency engine does not negate the need to include the NESHAP 4Z requirements. We see no legal and/or regulatory basis for omitting the NESHAP 4Z requirements from the draft permit. In order to comply with the CAA §§504(a) and (c), 40 CFR §70.6, and 6 NYCRR 201-6.4, all NESHAP 4Z requirements that apply to the emergency engines at Hollingsworth must be included in the draft permit. In addition, the emergency engines should be specified as emission sources in the draft permit.

- 3. 6 NYCRR Part 225-1.2(h) “Sulfur content of the distillate fuel oil fired in combustion sources”**
EPA notes that the draft permit does not establish a limit on the sulfur content of the distillate oil fired in the combustion sources, such as emergency engines, at the facility. Please update the draft permit, as necessary, by including this limit.

We look forward to working with you to address these comments. If you have any further questions or wish to discuss any of these issues, please feel free to contact Ms. Viorica Petriman at 212-637-4021 or petriman.viorica@epa.gov.

Sincerely,

Suilin W. Chan, Chief
Permitting Section
Air and Radiation Division

¹ “Applicable Requirement: 40 CFR 60 Subpart JJJJ/40 CFR 63 Subpart ZZZZ - The facility meets the exemption under Subpart ZZZZ for emergency engines, however, the NYS emergency engine definition is more stringent and thus no Subpart ZZZZ conditions have been added to the permit.”