



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 5-5205-00013/00058  
Mod 0 Effective Date: 02/28/2017 Expiration Date: 02/27/2022

Mod 1 Effective Date: Expiration Date:

Permit Issued To: LEHIGH NORTHEAST CEMENT COMPANY  
313 WARREN ST  
GLENS FALLS, NY 12801

Contact: Stephanie Rochow  
313 Warren St  
Glens Falls, NY 12801  
(518) 792-1137

Facility: LEHIGH NORTHEAST CEMENT COMPANY  
313 WARREN ST  
GLENS FALLS, NY 12801

Description:

The Lehigh Northeast Cement Company, located in Glens Falls, NY, consists of a Portland cement manufacturing operation and an associated quarry. Various types of Portland cements are produced using a combination of limestone, sand gypsum, and other materials of similar chemical composition. These materials are heated in the facility's rotary kiln to form cement clinker, which is cooled and ground to form cement.

Operations at the facility have been broken down into nine (9) emission units, each having related functions and processes, as follows:

- Stone quarrying and preliminary crushing (Emission Unit U-QUARY);
- Raw material storage and handling (Emission Unit U-RMHND);
- Raw material grinding (Emission Unit (U-RAWGR);
- Kiln or pyroprocessing system (Emission Unit U-KILN);
- Solid fuel (coal and DEC approved alternative fuels) (Emission Unit U-FUEL);
- Cement clinker transport and storage (Emission Unit U-CLTRN);
- Precrusher (Polycom) system (Emission Unit U-PLYCM);
- Finish mill/Product storage (Emission Unit U-FINML); and
- Product packing and loading (Emission Unit U-SHPNG).



Applicable Requirements at the facility-wide level include:

6 NYCRR 200	6 NYCRR 215.2
6 NYCRR 202-2	6 NYCRR 220-1.4(c)
6 NYCRR 211.2	40 CFR 82.106 (SubPart E)
6 NYCRR 211.3	40 CFR 63 Subpart LLL for
existing Area Sources	
40 CFR 60 Subpart F	6 NYCRR Part 212

Quarry Operations (Emission Unit U-QUARY) - Glens Falls owns and operates a quarry on property adjacent to the manufacturing facility. Limestone is mined from the quarry walls primarily by drilling and blasting into the stone. The fragmented stone loosened from the walls is loaded into large dump trucks using wheel loaders. The rock is transported to a crusher where the size of the mined stone is reduced. The crushed material is transported by conveyor to the stone storage building or storage piles to await further processing or direct sale. Applicable Requirements Include: 6 NYCRR Part 212-1.6 & Part 212-2.4(a).

Raw Material Handling (Emission Unit U-RMHND) - Raw materials (other than limestone) are delivered to the facility via trucks.. These materials are off-loaded for storage using a series of conveyors and wheel loaders and placed in piles. As previously mentioned, limestone and related raw material stone is stored in the stone storage building. A reclaimer is used to recover the piles within the storage building. A series of conveyors are used to transport the raw materials from storage to the raw grinding operation. Applicable Requirements Include: 6 NYCRR Part 220, 40 CFR 60 (SubPart F) & 40 CFR 63 (SubPart LLL) for area source.

Raw Material Grinding (Emission Unit U-RAWGR) - After transport from storage, the various raw materials are blended and pulverized in the raw (roller) mill for preparation as a feed mixture for the kilns. When the feed mixture has reached a desired consistency or blend, it is transported to a series of storage silos until it is fed into the kiln for further processing. Applicable Requirements Include: 6 NYCRR Part 220, 40 CFR 60 (SubPart F) & 40 CFR 63 (SubPart LLL) for area source.

Kiln (Pyroprocessing) System (Emission Unit U-KILN) - The rotary kiln (and its associated clinker cooler) are the primary tools used in the manufacture of Portland cement. Two primary operations occur in this equipment: (1) creation of cement "clinker" in the kilns and (2) cooling of the newly-manufactured clinker for further processing or storage. Raw feed is transported to the kiln



from the storage silow. Within the interior of the kiln, temperatures in excess of 2700 deg F create the clinker, consisting of balls of hard, rock-like material, from the raw feed. Coal and/or DEC approved alternative fuels are the primary fuel used to fire the kiln, with natural gas used as a startup or backup fuel. When the clinker has been fully formed, it is conveyed to the clinker cooler, which consists of a series of grates over which the clinker travels and is exposed to forced ambient air for cooling. The Applicable Requirements Include:

6 NYCRR 212-1.3(a) for "A" rated toxics (SubPart A)	40 CFR 60.7
6 NYCRR 220-1.3(a)	40 CFR 60.8 (SubPart A)
6 NYCRR 220-1.6(b)(1)	40 CFR 60.11 (SubPart A)
6 NYCRR 220-1.7	40 CFR 60.13 (SubPart A)
6 NYCRR 225-1.2(a)(2)	40 CFR 60 (SubPart F)
6 NYCRR 204	40 CFR
63 (SubPart LLL) for area source	

Note: Not all equipment and/or processes within this emission unit are subject to the requirements of 40 CFR 60 (New Source Performance Standards).

Solid Fuel System (Emission Unit U-FUEL) which includes coal, and other DEC approved alternative fuels - Coal is delivered to the facility via trucks or railcars. The material is unloaded to an outdoor storage pile directly from the truck (through dumping) or using wheel loaders or similar equipment. Coal from the pile is fed into a coal bin to a ball mill (coal mill), which reduces the size of the coal for optimum combustion within the kiln.

Note: The equipment and processes within this emission unit are subject to facility-wide applicable requirements only.

Clinker Transport and Storage (Emission Unit U\_CLTRN) - After being cooled within the clinker cooler, the clinker is transported (via conveyors) to a series of storage silow, or in cases of excess production, to an enclosed outdoor storage facility. If for some reason the clinker is found to not meet required specifications, it is sent to one of several outdoor "off-spec" clinker piles, where it is stored until it can be re-used within the manufacturing operation.

Applicable Requirements Include:

40 CFR 60.11 (SubPart A)	
40 CFR 60.7 (SubPart A)	40 CFR 60 (SubPart F)
40 CFR 60.8 (SubPart A)	40 CFR 63 Subpart LLL



for existing Area Sources

Note: Not all equipment and/or processes within this emission unit are subject to the requirements of 40 CFR 60 (New Source Performance Standards).

Precrusher (Polycom) System (Emission Unit U-PLYCM) - Prior to entering the finishing stage of the manufacturing process, clinker is conveyed to the pre-crusher or Polycom. This equipment reduces the size of the clinker and allows the mills which produce the finished product (cement) to operate more efficiently. Applicable Requirements Include:

40 CFR 60.11 (SubPart A)	
40 CFR 60.7 (SubPart A)	40 CFR 60 (SubPart F)
40 CFR 60.8 (SubPart A)	40 CFR 63 Subpart LLL

for existing Area Sources

Note: Not all equipment and/or processes within this emission unit are subject to the requirements of 40 CFR 60 (New Source Performance Standards).

Finish Mill System (Emission Unit U-FINML) - The facility operates two (2) finish mills which process the precrushed clinker into saleable product. Clinker is conveyed to the mills where it is mixed with additional solids (such as gypsum, limestone, or other materials) and grinding aids. These additional materials are delivered to the site via trucks, unloaded to storage and conveyed to the finish mills in a manner which is similar to that described in Emission Unit U-RMHND. The Applicable Requirements Include:

40 CFR 60.11. (SubPart A)	
40 CFR 60.7 (SubPart A)	40 CFR 60 (SubPart F)
40 CFR 60.8 (SubPart A)	40 CFR 63 Subpart LLL

for existing Area Sources

Note: Not all equipment and/or processes within this emission unit are subject to the requirements of 40 CFR 60 (New Source Performance Standards).

Product Packaging and Loading (Emission Unit U-SHPNG) - The finished cement is stored within two large banks of silos. The finished product is loaded into the silos from the top and withdrawn from the bottom. The finished product may be shipped from the facility in bulk (via railcars or trucks) or packaged.

Applicable Requirements Include:



40 CFR 60.11  
40 CFR 60.7 (SubPart A)                      40 CFR 60 (SubPart F)  
40 CFR 60.8 (SubPart A)                      40 CFR 63 Subpart LLL  
for existing Area Sources

Note: Not all equipment and/or processes within this emission unit are subject to the requirements of 40 CFR 60 (New Source Performance Standards).

Processes at the facility are regulated for emissions of particulates under 6 NYCRR 212, 6 NYCRR 220, 40 CFR 60 SubPart F and 40 CFR 63 Subpart LLL. Emissions of oxides of nitrogen (NO<sub>x</sub>) under 6 NYCRR 220-1.6(b)(1-4). Emissions of sulfur compounds are indirectly regulated through the sulfur in fuel limits contained in 6 NYCRR 225 and 6 NYCRR 220-1.6(a).

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:                      MARC S MIGLIORE  
    NYSDEC - WARRENSBURG SUBOFFICE  
    232 GOLF COURSE RD  
    WARRENSBURG, NY 12885

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.



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**DEC GENERAL CONDITIONS**

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**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

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

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by





the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

**Condition 1-1: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 1-1.1:**

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

**Item 1-1.2:**

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

**Item 1-1.3**

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

**Item 4.1:**

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

**Item 4.2:**

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

**Item 5.1:**

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 6: Submission of application for permit modification or renewal-REGION 5  
SUBOFFICE - WARRENSBURG  
Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 6.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road  
Warrensburg, NY 12885-1172  
(518) 623-1281