



Momentive Performance Materials Inc.  
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March 6, 2011

Mr. Stephen J. Barlow, P.E.  
NYS Dept. of Environmental Conservation  
Division of Air Resources  
232 Golf Course Road  
Warrensburg, NY, 12885

**Re: 40 CFR 63 Subpart EEE – Notification of Compliance – Rotary Kiln Incinerator (RKI)  
– MPM Silicones, Waterford, NY**

Dear Mr. Barlow

As required by 40 CFR 63.1210(b), Momentive Performance Materials (MPM) Silicones is submitting the attached Notification of Compliance, Table A, dated 3/6/2011. This table includes the operating parameters for the RKI that will ensure compliance with Subpart EEE requirements. These operating parameters were derived from the 2010 Comprehensive Performance Test data for the RKI.

MPM will complete all required Provox programming to implement the necessary revisions to the automatic waste feed cutoff system by April 6, 2011 and the revised NOC limits will be in effect on that date.

If you have any questions, please do not hesitate to contact Ruth Yeomans at (518) 233-5075.

Sincerely,

John J. Buhmann II, Manager  
Environmental, Health, Safety & Security

Momentive Performance Materials

cc: D. Gardell, NYSDEC  
R. Hiley, R. Davis, K. Smith, K. Pinks, M. Lunden, R. Yeomans MPM

**Table A - Notification of Compliance - RKI Testing Results**

Maximum Temperature June 2010			
Compound	CPT Result	MACT Limit	Units
Dioxins/Furans	-	0.4	ng TEQ/dscm
Mercury	<0.02	130	ug/dscm (7%O2)
SVM <sup>1</sup>	23	230	ug/dscm (7%O2)
LVM <sup>1</sup>	85	92	ug/dscm (7%O2)
CO	2	100	ppmv (7% O2)
DRE Toluene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
DRE Napthalene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
DRE Chlorobenzene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
Hydrocarbons	0.69	10	ppmv (7% O2)
HCl + Cl2	1.06	32	ppmv (7% O2)
PM <sup>2</sup>	0.007	0.08	gr/dscf (7% O2)

Maximum Temperature ReTest December 2010			
Compound	CPT Result	MACT Limit	Units
Dioxins/Furans	-	0.4	ng TEQ/dscm
Mercury	<0.18	130	ug/dscm (7%O2)
SVM <sup>3</sup>	4.5	230	ug/dscm (7%O2)
LVM <sup>3</sup>	19	92	ug/dscm (7%O2)
CO	1	100	ppmv (7% O2)
DRE Toluene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
DRE Napthalene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
DRE Chlorobenzene	-	99.99	% DRE
	-	99.99	% DRE
	-	99.99	% DRE
Hydrocarbons	-	10	ppmv (7% O2)
HCl + Cl2	<1.3	32	ppmv (7% O2)
PM <sup>2</sup>	0.004	0.08	gr/dscf (7% O2)

Minimum Temperature June 2010			
Compound	CPT Result	MACT Limit	Units
Dioxins/Furans	0.003	0.4	ng TEQ/dscm
Mercury	-	130	ug/dscm (7%O2)
SVM	-	230	ug/dscm (7%O2)
LVM	-	92	ug/dscm (7%O2)
CO	2	100	ppmv (7% O2)
DRE Toluene	99.991	99.99	% DRE
	99.9991	99.99	% DRE
	99.9996	99.99	% DRE
DRE Napthalene	99.9999	99.99	% DRE
	99.9997	99.99	% DRE
	99.9996	99.99	% DRE
DRE Chlorobenzene	99.999	99.99	% DRE
	99.9996	99.99	% DRE
	99.9998	99.99	% DRE
Hydrocarbons	0.82	10	ppmv (7% O2)
HCl + Cl2	2.15	32	ppmv (7% O2)
PM <sup>2</sup>	0.013	0.08	gr/dscf (7% O2)

Notes

- 1 SVM and LVM values are numerated and non-numerated metals combined. The facility tested for all HAP metals during CPT. Metals results reported are conservatively high due to sample contamination as seen in field blank samples.
- 2 Particulate matter limit shown is for the Alternative Metal Standard RCRA Limit
- 3 SVM and LVM values are numerated and non-numerated metals combined. The facility tested for all HAP metals during CPT.

**Table A - Notification of Compliance - Continued**  
**RKI Normal Operation**

Citation	Permit Condition	Monitoring Requirement	Monitoring Method	AWFCO Monitoring Limit	Monitoring Units	Monitoring Frequency	Monitoring Averaging Period	Method to set limit
63.1219(a)(5)(l)	407	Continuously monitor CO using CEMS	CO CEMS	100	ppmv	Continuous	Hourly-Rolling	Per Regulation
63.1209(c)	325	Feedstream analysis per Feedstream Analysis Plan	Per Feedstream Analysis Plan	-	-	-	-	Per Regulation
63.1209(j)(1)	328	Minimum kiln temperature	Monitor kiln temperature	999	Degrees C	Continuous	Hourly-Rolling	Average of Min Temp run averages
63.1209(j)(1)	330	Minimum SCC temperature	Monitor SCC temperature	996	Degrees C	Continuous	Hourly-Rolling	Average of Min Temp run averages
63.1209(j)(2)	1-39	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209(j)(3)	343	Maximum hazardous waste feedrate	Monitor APS feedrate	49	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp run feed rates for APS and Water
63.1209(j)(3)	342	Maximum hazardous waste feedrate	Monitor total Group II feedrate	76	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Max Temp runs for Group II feeds
63.1209(j)(3)	337	Maximum hazardous waste feedrate	Monitor total Group I and II feedrate	78	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs for Group I+II feeds
63.1209(j)(3)	339	Maximum hazardous waste feedrate	Monitor drum feedrate	6.7	drums/hr	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs
63.1209(j)(3)	1-41	Maximum hazardous waste feedrate	Monitor drum feedrate	1,660	lb/hr	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs
63.1209(j)(3)	1-41	Maximum hazardous waste feedrate	Monitor drum feedrate	450	lbs/drum	Continuous	Instantaneous	Maximum Drum weight demonstrated during Min Temp Runs
63.1209(j)(4)	345	Minimum steam atomization pressure	Monitor steam atomization pressure	62	psig	Continuous	Hourly-Rolling	Average of the Min Temp run averages
63.1209(j)(4)	347	Minimum air atomization pressure	Monitor air atomization pressure	29	psig	Continuous	Hourly-Rolling	Average of the Min Temp run averages
63.1209(k)(2)	not in permit	Minimum kiln temperature	Monitor kiln temperature	999	Degrees C	Continuous	Hourly-Rolling	Average of Min Temp run averages
63.1209(k)(2)	not in permit	Minimum SCC temperature	Monitor SCC temperature	996	Degrees C	Continuous	Hourly-Rolling	Average of Min Temp run averages
63.1209(k)(3)	not in permit	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209(k)(4)	not in permit	Maximum hazardous waste feedrate	Monitor APS feedrate	49	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp run feed rates for APS and Water
63.1209(k)(4)	not in permit	Maximum hazardous waste feedrate	Monitor total Group II feedrate	76	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Max Temp runs for Group II feeds
63.1209(k)(4)	not in permit	Maximum hazardous waste feedrate	Monitor total Group I and II feedrate	78	lbs/min	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs for Group I+II feeds
63.1209(k)(4)	not in permit	Maximum hazardous waste feedrate	Monitor drum feedrate	6.7	drums/hr	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs
63.1209(k)(4)	not in permit	Maximum hazardous waste feedrate	Monitor drum feedrate	1,660	lb/hr	Continuous	Hourly-Rolling	Average of the maximum hourly averages for the Min Temp runs
63.1209(l)(1)	349	Maximum mercury feedrate	Monitor mercury feedrate based on sampling analysis and hazardous waste feedrate	0.0071	lb/hr	Continuous	12-Hour-Rolling	Extrapolation from Max Temp Re test run averages
63.1209(l)(2)	not in permit	Monitor wet scrubber	Monitoring wet scrubber per 63.1209(o)	-	-	-	-	-
63.1209(m)(1)	363	Monitor IWS system	Monitor IWS 1A makeup water flowrate	41	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	361	Monitor IWS system	Monitor IWS 1B makeup water flowrate	40	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	359	Monitor IWS system	Monitor IWS 1C makeup water flowrate	29	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	360	Monitor IWS system	Monitor IWS 2A makeup water flowrate	49	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	357	Monitor IWS system	Monitor IWS 2B makeup water flowrate	46	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	358	Monitor IWS system	Monitor IWS 2C makeup water flowrate	30	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	363	Monitor IWS system	Monitor IWS 1A crossflow scrubber flowrate	359	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	361	Monitor IWS system	Monitor IWS 1B crossflow scrubber flowrate	353	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	359	Monitor IWS system	Monitor IWS 1C crossflow scrubber flowrate	355	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages, excluding routine IWS flush cycle periods
63.1209(m)(1)	360	Monitor IWS system	Monitor IWS 2A crossflow scrubber flowrate	348	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	357	Monitor IWS system	Monitor IWS 2B crossflow scrubber flowrate	347	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(m)(1)	358	Monitor IWS system	Monitor IWS 2C crossflow scrubber flowrate	343	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages, excluding routine IWS flush cycle periods
63.1209(m)(1)	1-42	Monitor IWS system	Sum of 1-Side IWS Train	6.6	KW	Continuous	Hourly-Rolling	Average of the Max Temp run averages, excluding routine IWS flush cycle periods
63.1209(m)(1)	1-42	Monitor IWS system	Monitor 1C IWS power	4.6	KW	Continuous	Hourly-Rolling	Average of the Max Temp run averages, excluding routine IWS flush cycle periods
63.1209(m)(1)	1-42	Monitor IWS system	Sum of 2-Side IWS Train	6.7	KW	Continuous	Hourly-Rolling	Average of the Max Temp run averages, excluding routine IWS flush cycle periods
63.1209(m)(1)	1-42	Monitor IWS system	Monitor 2C IWS power	4.8	KW	Continuous	Hourly-Rolling	Average of the Max Temp run averages, excluding routine IWS flush cycle periods

**Table A - Notification of Compliance - Continued**  
**RKI Normal Operation**

Citation	Permit Condition	Monitoring Requirement	Monitoring Method	AWFCO Monitoring Limit	Monitoring Units	Monitoring Frequency	Monitoring Averaging Period	Method to set limit
63.1209(m)(2)	not in permit	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209(m)(3)	370	Maximum Ash Feedrate	Monitor silica feedrate	2,236	lb/hr as SiO2	Continuous	12-Hour-Rolling	Average of the Max Temp run averages
63.1209(n)(2)	1-43	Maximum SVM feedrate	Monitor SVM feedrate	0.34	lb/hr	Continuous	12-Hour-Rolling	Extrapolation from Max Temp Re test run averages
63.1209(n)(2)	373	Maximum LVM feedrate	Monitor LVM feedrate	0.78	lb/hr	Continuous	12-Hour-Rolling	Extrapolation from Max Temp Re test run averages
63.1209(n)(2)	328	Maximum SCC Upper Temperature	Monitor SCC Upper temperature	1,202	Degrees C	Continuous	Hourly-Rolling	Average of the Max Temp run averages
63.1209(n)(2)	330	Maximum SCC Lower Temperature	Monitor SCC Lower temperature	1,209	Degrees C	Continuous	Hourly-Rolling	Average of the Max Temp run averages
63.1209(n)(3)	not in permit		Monitor operating parameters in 63.1209(m)(1)	-				Per Regulation
63.1209(n)(4)	377	Maximum chlorine feedrate	Monitor chlorine feedrate	1,786	lb/hr as HCl	Continuous	12-Hour-Rolling	Average of the most conservative condition feedrate run averages, in this instance the Max Temp runs
63.1209(n)(5)	not in permit	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209(o)(1)	not in permit	Maximum chlorine feedrate	Monitor chlorine feedrate	1,786	lb/hr as HCl	Continuous	12-Hour-Rolling	Average of the most conservative condition feedrate run averages, in this instance the Max Temp runs
63.1209(o)(2)	not in permit	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209(o)(3)(ii)	378	Minimum pressure drop across CCS scrubber	Monitor pressure drop across SCC scrubber	0.4	in H2O	Continuous	Hourly-Rolling	Manufacturer Recommendation
63.1209(o)(3)(iii)	380	Monitor scrubber inlet pressure	Monitor scrubber inlet pressure	-	-	Once per shift	-	EPA Waiver
63.1209(o)(3)(v)	386	Minimum CCS water flowrate	Monitor CCS water flowrate	1,227	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(o)(3)(v)	384	Minimum quench water flowrate	Monitor quench water flowrate	180	gpm	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209(o)(3)(v)	not in permit	Maximum flue gas flowrate	Monitor stack gas flowrate	20,524	acfm	Continuous	Hourly-Rolling	Average of the maximum hourly averages for Max and Min Temp runs
63.1209 (o)(3)(iv)	382	Minimum IWS scrubber pH	Monitor IWS 1A scrubber pH	9.3	pH units	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209 (o)(3)(iv)	382	Minimum IWS scrubber pH	Monitor IWS 1B scrubber pH	9.2	pH units	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209 (o)(3)(iv)	382	Minimum IWS scrubber pH	Monitor IWS 2A scrubber pH	9.3	pH units	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209 (o)(3)(iv)	382	Minimum IWS scrubber pH	Monitor IWS 2B scrubber pH	9.2	pH units	Continuous	Hourly-Rolling	Average of the Min Temp and Max Temp run averages
63.1209 (p)	1-45	Maximum combustion chamber pressure	Monitor combustion chamber pressure	-0.3	in H2O	Continuous	Instantaneous	Previous Limit
63.114(a)(1)(i) Subpart G	1-20	Lower Temperature Limit for Incinerator	Monitor Kiln Temperature	999	C		24-Hour Block	Average of the Min Temp run averages from the 2010 CPT
63.114(a)(4)(i) Subpart G	160	IWS pH	Monitor 1A, 1B, 2A, 2B IWS scrubber pH	8.4	pH units		24-Hour Block	Previous Limit
63.114(a)(4)(ii) Subpart G	169	Lower Limit for Volumetric Flow Rate	Monitor CCS scrubber water flowrate	1160	gpm		24-Hour Block	Previous Limit
63.114(a)(4)(ii) Subpart G	1-22	Stack Gas Flow Rate	Monitor stack gas flow rate	20524	acfm		24-Hour Block	Average of Min Temp and Max Temp run averages from 2010 CPT



**Table B**  
**Data used for Computation of NOC MACT limits**

*Only data applicable to average computation shown*

	Units	Minimum Temperature Testing			Maximum Temperature Testing			Maximum Temperature ReTest			Average	Extrapolated Value
		Run 1	Run 2	Run 3	Run 1	Run 2	Run 3	Run 1	Run 2	Run 3		
Antimony Feed Rate	Lbs/Hr							0.000	0.000	0.000		
Arsenic Feed Rate	Lbs/Hr							0.110	0.0684	0.0600		
Beryllium Feed Rate	Lbs/Hr							0.0231	0.0239	0.0195		
Chromium Feed Rate	Lbs/Hr							0.246	0.241	0.245		
Cobalt Feed Rate	Lbs/Hr							0.000	0.000	0.000		
Manganese Feed Rate	Lbs/Hr							0.0275	0.0200	0.0395		
Nickel Feed Rate	Lbs/Hr							0.28	0.20	0.20		
Cadmium Feed Rate	Lbs/Hr							0.0118	0.0122	0.0157		
Lead Feed Rate	Lbs/Hr							0.236	0.249	0.254		
Selenium Feed Rate	Lbs/Hr							0.000	0.000	0.000		
SiO2 Feed Rate	Lbs/Hr				2183	2397	2407	2093	2237	2096	2236	
HCl Feed Rate	Lbs/Hr				1743	1829	1956	1810	1675	1702	1786	
LVM Emissions	mg/dscm at 7% O2											24
SVM Emissions	mg/dscm at 7% O2											5.8
Mercury Emissions	mg/dscm at 7% O2											0.24
Particulate Emissions	gr/dscf at 7% O2	0.017	0.012	0.010	0.011	0.006	0.006	0.002	0.0005	0.008	0.0081	
Cl- Emissions	ppmv, dry at 7% O2	2.66	2.09	1.71	1.27	0.86	1.06	<1.14	<1.24	<1.50	1.50	
Cl2 Emissions	lb/hr	0.100	0.083	0.058	0.052	0.051	0.055	<0.071	<0.071	<0.071	0.068	