

Town of North Castle Building Department

17 Bedford Road

Armonk, New York 10504-1898

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Operating Permit Review

Date: April 9, 2022

Address: 6 Labriola Court, Armonk, New York 10504

Project/Business: OAMIC Ingredients, LLC

Proposed: Amended Planning Board Review – Operating Permit

We reviewed the recent submission which includes a request to amend the operating permit and the addition of 47 new chemical products.

Proposed is the addition of Class 1A, 1B, & 1C Flammable Liquids, and Class II Combustible Liquids.

Please find our review comments below:

Provide a new - complete Operating Permit Application with all applicable sections including:

1. A new Operating Permit Application.
2. Update “as needed to reflect new products,” the Hazardous Materials Management Plan.
3. Update “as needed,” the Hazardous Material Inventory Statement.
4. Emergency Action – previous version is acceptable however, please provide a copy with the new “complete” submission.
5. Original Exhibit A: Zoning – previous narrative provided shall be reviewed by Town Planner and Building Inspector for compliance. Please add to revised submission.
6. Provide an updated 209 U Form.
7. Material Safety Data Sheets have been provided – no further action required.

To expedite and continue the review, we request that each section submitted; including, but not limited to: facilities map, product list(s) and other documents/materials recently provided be identified (titled) as a separate exhibit (“as previously submitted”) and include a table of contents. We also ask that the Excel fields (column height specifically) be expanded so we can read all of the notes contained therein.

NOTE* NYS Variance Petition No. 2019-0622 is specific to Group B Business/H3 – “High Hazard Building” Class 3A Combustible and Class I-IV Commodities. Variance may need to be amended to reflect Higher Hazard classification “H2” including the addition of class 1A, 1B, and Class 1C Flammable liquids and Class II Combustible liquids. The Building Inspector shall contact the NYS Division of Codes for further direction.

We further note the addition of the new products exceed the maximum allowable quantity per control area – which is permitted (refer to table 5003.1.1(1)). In addition, Class 1A (specifically) Flammable Liquid(s) requires additional mechanisms of control pursuant to 2020 NYSFC Chapter(s) 50 & 57. Please find our additional review comments below.

Refer to TABLE 5003.1.1(1) MAXIMUM ALLOWABLE QUANTITY PER CONTROL AREA OF HAZARDOUS MATERIALS POSING A PHYSICAL HAZARD - Flammable Liquid.

Maximum storage height of class 1A, 1B, & 1C type flammable liquids, refer to TABLE 5704.3.6.3(1) MAXIMUM STORAGE HEIGHT IN CONTROL AREA. Indicate container type(s) and apply relevant code section pursuant to 5704.3.6.3 Fire protection and storage arrangements. Further, refer to code section(s) TABLE 5704.3.6.3(2) STORAGE ARRANGEMENTS FOR PALLETIZED OR SOLID-PILE STORAGE IN LIQUID STORAGE ROOMS AND WAREHOUSES. TABLE 5704.3.6.3(3) STORAGE ARRANGEMENTS FOR RACK STORAGE IN LIQUID STORAGE ROOMS AND WAREHOUSES. **PROVIDE** a narrative that demonstrates compliance with these sections. We point your attention to code section 5704.3.8 Liquid storage warehouses.

We further note that buildings used for storage of flammable or *combustible liquids* in quantities exceeding those set forth in Section 5704.3.4 for *control areas* and Section 5704.3.7 for liquid storage rooms shall comply with Sections 5704.3.8.1 through 5704.3.8.5 and shall be constructed and separated as required by the *Building Code of New York State*. Therefore, we ask for a narrative demonstrating compliance specific to the following code section(s).

5704.3.8.1 Quantities and storage arrangement.

The total quantities of liquids in a liquid storage warehouse shall not be limited. The arrangement of storage shall be in accordance with Table 5704.3.6.3(2) or 5704.3.6.3(3).

Provide additional information demonstration compliance with 5704.3.8.1 Quantities and storage arrangement. The total quantities of liquids in a liquid storage warehouse shall not be limited. The arrangement of storage shall be in accordance with Table 5704.3.6.3(2) or 5704.3.6.3(3).

1. 5704.3.8.1.1 Mixed storage. Mixed storage shall be in accordance with Section 5704.3.7.2.1.
2. 5704.3.8.1.2 Separation and aisles. Separation and *aisles* shall be in accordance with Section 5704.3.7.2.2.

We do note that ventilation is indicated in the recent submission. However, we further request that a narrative be provided demonstrating compliance with 5704.3.8.3 “Ventilation.” Liquid storage warehouses storing containers greater than 5 gallons (19 L) in capacity shall be ventilated at a rate of not less than 0.25 cfm per square foot ($0.075 \text{ m}^3/\text{s} \cdot \text{m}^2$) of floor area over the storage area.

Additionally, the introduction of a Class 1A & 1B requires explosion control methods for indoor storage rooms pursuant to NYSFC Section 911 & 5004.6 Explosion control. Provide additional information and a narrative demonstrating compliance pursuant to these sections.

Refer to section TABLE 911.1 EXPLOSION CONTROL REQUIREMENTS: Flammable Liquids 1A(b) (storage or use) (required). Demonstrate compliance with section 911.2 Required deflagration venting. Refer to code section 911.3 Explosion prevention systems. Explosion prevention systems shall be of an *approved* type and installed in accordance with the provisions of this code and NFPA 69.

Note* We defer to the Town Planner as to whether the DEP and/or DEC requires notification of the proposed changes.

Prior to the issuance of the Permanent Operating Permit, a facilities inspection should be completed prior to the addition of the new products to ensure compliance with the applicable code sections referenced above and following; after product(s) are delivered and stored in their properly designated locations.