

New York State Department of Environmental Conservation
Facility DEC ID: 5154800008



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-1548-00008/00081
Effective Date: 01/10/2007 Expiration Date: 01/09/2012

Permit Issued To: INTERNATIONAL PAPER CO
6400 POPLAR AVE
MEMPHIS, TN 38197

Contact: CHRISTOPHER P MALLON
568 SHORE AIRPORT ROAD
TICONDEROGA, NY 12883
(518) 585-5358

Facility: INTERNATIONAL PAPER TICONDEROGA MILL
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883

Contact: DONNA WADSWORTH
IP TICONDEROGA MILL
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883
(518) 585-5460

Description:

International Paper Ticonderoga Mill is a fully integrated pulp and paper manufacturer. The facility processes hardwood and softwood pulp log and chip raw materials using the Kraft process. Converted kraft pulp is washed, bleached and prepared for finishing by paper machines. Parent rolls produced by the machines are rewound and cut into sheets to meet customer specifications, packaged and stored in warehouses to await shipping to customers.

A number of supporting processes are required to produce pulp and paper. The Power Boiler produces steam for generating electricity and providing process and comfort heat. A recovery furnace and recausticizing process recover chemicals from the pulping process and prepare them for reuse. A treatment plant collects and processes the wastewater.

New York State Department of Environmental Conservation
Facility DEC ID: 5154800008



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: WALTER L HAYNES
 DIVISION OF ENVIRONMENTAL PERMITS
 232 GOLF COURSE RD PO BOX 220
 WARRENSBURG, NY 12885-0220

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 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 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.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 5
SUBOFFICE



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 and Modifications
Applicable State Requirement: 6NYCRR 621.13

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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:



New York State Department of Environmental Conservation
Facility DEC ID: 5154800008

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: Permit Modifications, Suspensions and Revocations by the Department
Applicable State Requirement: 6NYCRR 621.14

Item 4.1:

The Department reserves the right 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 5: Submission of Applications for Permit Modification or Renewal -REGION 5
SUBOFFICE
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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, PO Box 220
Warrensburg, NY 12885-0220
(518) 623-1281



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: INTERNATIONAL PAPER CO
6400 POPLAR AVE
MEMPHIS, TN 38197

Facility: INTERNATIONAL PAPER TICONDEROGA MILL
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883

Authorized Activity By Standard Industrial Classification Code:
2611 - PULP MILLS
2621 - PAPER MILLS EXC BUILDING PAPER

Permit Effective Date: 01/10/2007

Permit Expiration Date: 01/09/2012



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6NYCRR 201-6.5(a)(7): Fees
- 3 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 4 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 6 6NYCRR 201-6.5(e): Compliance Certification
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 10 6NYCRR 200.7: Maintenance of Equipment
- 11 6NYCRR 201-1.7: Recycling and Salvage
- 12 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 14 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 15 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 16 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 17 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 18 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 19 6NYCRR 202-1.1: Required Emissions Tests
- 20 6NYCRR 211.3: Visible Emissions Limited
- 21 40CFR 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6NYCRR 201-6: Emission Unit Definition
- 24 6NYCRR 201-6.5(g): Non Applicable requirements
- 25 6NYCRR 212.6(a): Compliance Certification
- 26 6NYCRR 225-1.2(d): Compliance Certification
- 27 6NYCRR 225-2.7: Compliance Certification
- 28 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
- 29 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
- 30 40CFR 63.10, Subpart A: Compliance Certification
- 31 40CFR 63.10, Subpart A: Compliance Certification
- 32 40CFR 63, Subpart S: Compliance Certification
- 33 40CFR 63.454(b), Subpart S: Compliance Certification
- 34 40CFR 63.454(b), Subpart S: Compliance Certification
- 35 40CFR 63, Subpart MM: Compliance Certification
- 36 40CFR 63, Subpart DDDDD: Compliance Certification

Emission Unit Level

- 37 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 38 6NYCRR 201-6: Process Definition By Emission Unit

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



EU=0-PAPER

39 6NYCRR 212.3(a): Emissions from existing sources

EU=0-WWTRT

40 6NYCRR 212.3(a): Emissions from existing sources

EU=B-PLANT

41 6NYCRR 212.3(a): Emissions from existing sources

42 40CFR 63.445(b), Subpart S: Bleaching Systems - Closed-vent System
and Control Device Requirements

43 40CFR 63.445(c)(2), Subpart S: Compliance Certification

44 40CFR 63.450(d), Subpart S: Compliance Certification

EU=B-PLANT,Proc=116,ES=10094

45 40CFR 63.453(c), Subpart S: Compliance Certification

46 40CFR 63.453(c), Subpart S: Compliance Certification

47 40CFR 63.453(c), Subpart S: Compliance Certification

EU=P-OWERH

48 6NYCRR 204-2.1: Submissions to the Department.

49 6NYCRR 204-4.1: Content of reports and compliance certifications.

50 6NYCRR 204-7.1: Submission of NOx allowance transfers.

51 6NYCRR 204-8.1: General provisions.

52 6NYCRR 204-8.1: Prohibitions.

53 6NYCRR 204-8.1: Requirements for installation, certification, and
data accounting.

54 6NYCRR 204-8.2: Requirements for recertification of monitoring systems.

55 6NYCRR 204-8.3: Out of control periods.

56 6NYCRR 204-8.4: Compliance Certification

57 6NYCRR 204-8.7: Compliance Certification

58 6NYCRR 225-1.7(c): Compliance Certification

59 6NYCRR 225-1.7(e): Compliance Certification

60 6NYCRR 225-2.3(b)(1): Compliance Certification

61 6NYCRR 227-1.2: Compliance Certification

62 6NYCRR 227-1.2(a)(3): Compliance Certification

63 6NYCRR 227-2.4(a): Compliance Certification

EU=P-OWERH,Proc=111

64 40CFR 63.443(d)(4), Subpart S: Compliance Certification

EU=P-OWERH,EP=00044

65 6NYCRR 227-1.3(a): Compliance Certification

66 6NYCRR 227-2.4(a)(2): Compliance Certification

67 40CFR 52.21(k), Subpart A: Compliance Certification

68 40CFR 52.21(k), Subpart A: Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



69 40CFR 52.21(k), Subpart A: Compliance Certification

EU=P-ULPIN

70 40CFR 63.443(d), Subpart S: Compliance Certification

71 40CFR 63.446(e)(1), Subpart S: Compliance Certification

72 40CFR 63.450(d), Subpart S: Compliance Certification

EU=R-CAUST,Proc=115

73 6NYCRR 212.3: Compliance Certification

74 6NYCRR 212.10: Compliance Certification

EU=R-CAUST,Proc=115,ES=10005

75 6NYCRR 225-2.3(b)(1): Compliance Certification

EU=R-CAUST,Proc=115,ES=10077

76 6NYCRR 212.11(b)(5): Compliance Certification

77 40CFR 63.864(k), Subpart MM: Compliance Certification

78 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-CAUST,EP=00005

79 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

EU=R-ECOV B

80 6NYCRR 212.3: Compliance Certification

81 6NYCRR 212.3: Compliance Certification

EU=R-ECOV B,Proc=103,ES=10001

82 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

83 40CFR 63.864(d), Subpart MM: Compliance Certification

84 40CFR 63.864(k), Subpart MM: Compliance Certification

85 40CFR 63.864(k), Subpart MM: Compliance Certification

86 40CFR 63.867(b)(3), Subpart MM: Compliance Certification

EU=R-ECOV B,Proc=105,ES=10003

87 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

EU=R-ECOV B,Proc=105,ES=10102

88 40CFR 63.864(k), Subpart MM: Compliance Certification

89 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-ECOV B,EP=00001,Proc=103,ES=10001

90 6NYCRR 212.4: Compliance Certification

91 6NYCRR 212.10: Compliance Certification

EU=R-ECOV B,EP=00001,Proc=104,ES=10001

92 6NYCRR 212.4: Compliance Certification



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 93 ECL 19-0301: Contaminant List
- 94 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 95 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

EU=P-OWERH

- 96 6NYCRR 237-1.4(c)(1): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;

(3) During the period of the emergency the facility owner and/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 and/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 and/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 B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(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

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(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

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(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 201-6.7 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



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: 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 M: 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.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

**Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 01/10/2007 and 01/09/2012**

Applicable Federal Requirement: 6NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 3: Recordkeeping and reporting of compliance monitoring

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 3.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 6: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



following:

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions;and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.
- iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Region 5 Suboffice
232 Hudson Street
P.O. Box 220
Warrensburg, NY 12885-0220

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 7.1:
The Compliance Certification activity will be performed for the Facility.

Item 7.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Emission statements shall be submitted on or before April
15th each year for emissions of the previous calendar
year.

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 01/10/2007 and 01/09/2012



Applicable Federal Requirement: 6NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 215

Item 9.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 200.7

Item 10.1:

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications, required to operate such device effectively.

Condition 11: Recycling and Salvage
Effective between the dates of 01/10/2007 and 01/09/2012

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Applicable Federal Requirement: 6NYCRR 201-1.7

Item 11.1:

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 12.1:

No person shall remove, handle or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-3.2(a)

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains 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.

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-3.3(a)

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source 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 which contains 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.

Condition 15: Standard Requirement - Provide Information



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 19.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 20: Visible Emissions Limited
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 211.3

Item 20.1:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 21: Accidental release provisions.
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 68

Item 21.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 22.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements
for Title V permits only.**

Condition 23: Emission Unit Definition



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 23.1:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-PAPER

Emission Unit Description:

Paper mill: the paper mill converts pulp to various finished paper products via the nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Building(s): 4
5

Item 23.2:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: 0-WWTRT

Emission Unit Description:

The Ticonderoga Mill wastewater treatment plant provides neutralization, primary clarification, secondary biological treatment with aeration, wetlands treatment, secondary clarification, tertiary clarification, primary sludge dewatering and secondary sludge dewatering. Sources of wastewater include wood handling, pulp production, paper manufacturing, water treatment plant solids, boiler water treatment, electrical power generation, landfill leachate, sanitary wastewater and stormwater. Wastewater is conveyed to the various sections of the wastewater treatment plant through a network of underground pipelines.

Building(s): 35
T

Item 23.3:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: B-PLANT

Emission Unit Description:

Bleach plant area source: The bleach plant whitens pulp for paper production. Equipment venting to the bleach plant scrubber includes the #10 tower (first bleaching stage), #15 seal pit and washer hood, #35 seal pit and washer hood, #45 seal pit and washer hood, #55 seal pit and washer hood, #30 tower (third bleaching stage), #50



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

tower (fifth bleaching stage), the chlorine dioxide absorber, the pulp mill acid sewer, the emergency pressure relief hatches from two chlorine dioxide generators, the vents from two chlorine dioxide storage tanks, and a vent from a pulp mill chemical lab hood.. Processes that do not vent to the bleach plant scrubber include the second bleaching stage (20 tower) the fourth bleaching stage (40 tower) and four bleach pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Building(s): 6

Item 23.4:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: P-OWERH

Emission Unit Description:

The power boiler is a multi-fuel boiler that is permitted to fire no. 6 fuel oil, waste fuel type "A", wood residue consisting of bark, wood and sawdust, rejected digester wood knots, primary clarifier fiber and dried secondary biomass for the production of steam and electricity via a turbine generator. In addition, the power boiler is used to treat non-condensable gases (NCGs), which are produced in the pulping and chemical recovery processes, through thermal oxidation. It is not an incinerator and incinerator regulations such as 6NYCRR Part 219 and 40CFR61 Subpart E do not apply.

Building(s): 29

Item 23.5:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: P-ULPIN

Emission Unit Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulp washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA. The digester system includes a continuous digester, two flash tanks, 4 flash steam condensers, two

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



blow tanks, a chip bin feeder, a low pressure feeder, and a digester acid wash tank. Non-condensable gases (NCGs) are collected from all components of the digester system, except the low pressure feeder, for thermal oxidation in the power boiler. The low pressure feeder vents to the atmosphere only during digester start-up and shut-down. The evaporator system includes a six-effect evaporator, two concentrators, 2 surface condensers, a hogging ejector for the surface condensers, an air ejector, and evaporator seal tank, and a stripper feed jug. NCGs are collected from all components except the hogging ejector which is used only during evaporator start-up. The powerhouse black liquor spill tank collects liquor from process upsets, such as evaporator upsets, for use after the process stabilizes. This tank is vented to the HVLC system as part of the NESHAP. The knotter system includes two pressure primary knotters and two secondary knotters. NCGs from the system are collected for thermal oxidation at the secondary knotters. Knots leaving the knotter system are either conveyed pneumatically to the top of the digester for fiber recovery, through a cyclone, or ejected from the pulp mill for disposal or energy recovery. The pulp washing system includes a pressure diffuser, a black liquor dump tank, a black liquor holding tank, a diffuser filtrate tank, two vacuum drum washers, two vacuum drum washer seal tanks, brown stock washers, two brown stock washer seal tanks, and a washed stock storage tank. NCGs are collected from all components except the washed stock storage tank. The primary rejects tank and the refined rejects tank vent to the brown stock washers storage tank. Both of these tanks are part of the screen system. The decker system includes two vacuum deckers, a decker white water tank, a decker low density storage tank and a fiber salvage tank. The deckers and the decker low density storage tank are vented to a separate stack. The decker white water tank vents directly to the atmosphere from the tank. This emission unit also includes an unbleached hardwood pulp high density storage tank and an unbleached softwood high density storage tank. Both tanks vent to the atmosphere. The NCG collection system also collects NCGs from various weak and strong black liquor tanks that include two weak liquor tanks, two 50% liquor tanks, sour condensate tank, 2 strong liquor tanks, 2 black liquor soap storage tanks, the evaporater seal tanks, 3 precipitator mix tanks, an economizer liquor mix tank, and a salt cake mix tank. The non-condensable gas system delivers NCGs to the power boiler for thermal treatment.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Building(s): 19
29
6

Item 23.6:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: R-CAUST

Emission Unit Description:

Recausticizing area source: the Ticonderoga Mill recausticizing area performs the following tasks: clarifies green liquor from the smelt dissolving tank. - produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers. - clarifies white liquor slurry producing white liquor for use in the digester. - washes, stores and feeds lime mud from the white liquor clarifiers and converts it into "burnt " lime through a process called "calcining" in the lime kiln. Equipment in the recausticizing area includes a lime kiln, one green liquor clarifier, two green liquor storage tanks, one lime slaker, three causticizers, one white liquor clarifier, two white liquor storage tanks, one white liquor receiver tank, one sewer clarifier, one mud washer tank, one weak wash storage tank, sodium hydrosulfide storage tank, lime mud mix tank, lime mud storage tank, sewer clarifier filter hood vent, dregs filter hood vent, mud filter hood vent, and vacuum pumps for the sewer clarifier, dregs filters and lime mud filter.

Building(s): 19

Item 23.7:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: R-ECOV

Emission Unit Description:

The recovery furnace emission unit consists of a kraft recovery furnace and a smelt dissolving tank. The recovery furnace fires black liquor and number 6 oil to produce steam for manufacturing operations and smelt. Smelt (sulfur and sodium chemicals recycled in the draft process) flows from the bottom of the recovery boiler into the smelt dissolving tank to form green liquor. Recovery emissions flow through an electrostatic precipitator. Smelt dissolving tank emissions flow through a wet impact wet scrubber.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Building(s): 29

Item 23.8:

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: W-ODYD

Emission Unit Description:

The woodyard processing area provides delivery and storage of wood chips, round wood delivery, debarking, chipping, and chip screening. Wood chips are pneumatically blown to chip piles with 5 chip blowers. Two cyclones in the woodroom receive wood chips blown pneumatically from the chip storage area.

Building(s): 16
48
54
9

Condition 24: Non Applicable requirements
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 24.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 225-1.7

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input to the boiler.

6NYCRR 227-1

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input of the boiler.

40CFR 63-S.443(a)

Emission Unit: PULPIN Process: 120 Source: 10105

Reason: The decker system is not applicable to MACT Subpart S pulping system standards because it uses only fresh water, paper machine white water or process water with a total HAP concentration less than 400 parts per million by weight.



Condition 25: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 25.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: 0-PAPER

Emission Unit: P-ULPIN

Emission Unit: R-CAUST

Emission Unit: W-ODYD

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person will cause or allow emissions having an average opacity during any 6 consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 26: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-1.2(d)

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The sulfur content of the number 6 fuel oil fired shall not exceed 1.5% by weight. Compliance with this requirement shall be documented through the fuel supplier certification for each shipment of oil received.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 6 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-2.7

Item 27.1:

The Compliance Certification activity will be performed for the Facility.

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person delivering waste fuel A to a facility burning such waste fuel, must perform analyses or adopt procedures to assure compliance with Table 2-1 of section 225-2.4 of this Subpart prior to delivery. Sampling and analysis of waste fuel samples must be carried out in accordance with methods acceptable to the commissioner. A list of acceptable methods may be obtained from any office of the



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Department of Environmental Conservation.

The facility must maintain and retain records provided by the waste fuel supplier pursuant to this section and make such records available for inspection by the commissioner or his representative upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 28: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 28.1:

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

Condition 29: §63.10(d) General Reporting Requirements
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 29.1:

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

Condition 30: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 30.1:

The Compliance Certification activity will be performed for the Facility.

Item 30.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As described in 63.10(e)(3), reports of excess emissions and parameter monitoring exceedences must be submitted for sources that are required by subparts S and MM to install continuous monitoring systems. A combined report may be submitted for Subpart S and Subpart MM requirements. For sources demonstrating less than 1% excess emissions and less than 5% continuous monitor downtime during the reporting period, only a Summary report is required. The Summary report shall be entitled "Summary Report - Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and must contain the information outlined in 63.10(e)(3)(vi). For sources with more than 1% excess emissions or more than 5% continuous monitor downtime during the reporting period, both the Summary report and a Detailed report must be submitted. The detailed report must identify the specific time period, the cause and correction for each event as outlined in 63.10(c)(5) through (13).

Semiannual reporting periods in this permit are defined as April through September and October through March.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 31: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 31.1:

The Compliance Certification activity will be performed for the Facility.

Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each emission source subject to MACT requirements, a periodic SSM report must be submitted that briefly describes each malfunction and each startup or shutdown



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

event causing an exceedence of the MACT limit. Reports are only required if a startup, shutdown or malfunction event occurs during the reporting period and causes a MACT emission limit exceedence.

This report must contain the information outlined in 63.10(d)(5)(i) and the relevant parts of Subparts S and MM. The semiannual reports may be submitted simultaneously with the MACT Excess Emissions and Continuous Monitoring System report required by other conditions in this permit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 32: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63, Subpart S

Item 32.1:

The Compliance Certification activity will be performed for the Facility.

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must develop and implement a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan must include the requirements in paragraph 40CFR63.6(e)(3).

Excess emissions during startup, shutdown or malfunction will not be considered violations of the applicable requirements if the procedures of the SSM plan are followed during the episode.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 33: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.454(b), Subpart S

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall demonstrate initially and annually that the enclosure openings are maintained at negative pressure and that positive pressure portions of closed vent systems and each condensate tank used in the closed vent collection system operate with no detectable leaks as specified by 63.453(k)(3) and (4). For each required demonstration, the following information will be recorded:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) Results of negative pressure tests for enclosures;
- (4) Results of leak detection tests;
- (5) Nature of defect or leak and method of detection;
- (6) Date defect or leak was detected and date of each attempt to repair the defect or leak;
- (7) Repair method applied in each attempt to repair the defect or leak;
- (8) Reason for the delay if the defect or leak is not repaired within 15 days;
- (9) Expected date of successful repair if the repair is not completed within 15 days;
- (10) Date of successful repair of the leak or defect

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.454(b), Subpart S

Item 34.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-PLANT
Process: 116

Emission Unit: P-ULPIN
Process: 120

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall prepare and maintain a site-specific inspection plan including a drawing, schematic or pictures of the affected enclosures, closed vent system, and process condensate components. Inspection of the ductwork, piping, enclosures, and connections to covers shall be performed each month to identify evidence of visual defects and to ensure that closure mechanisms and bypass valves are maintained in the closed position. The following information shall be recorded for each monthly inspection:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) The nature of the defect or leak and the method of detection;
- (4) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
- (5) Repair methods applied in each attempt to repair the leak or defect;
- (6) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
- (7) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
- (8) The date of successful repair of the leak or defect;



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

- (9) The position and duration of opening of bypass line valves and the condition of any valve seals; and
- (10) The duration of the use of bypass valves on computer controlled valves.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 35: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63, Subpart MM

Item 35.1:

The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: R-CAUST
Process: 115 Emission Source: 10005

Emission Unit: R-ECOV B
Process: 105 Emission Source: 10003

Emission Unit: R-ECOV B
Process: 103 Emission Source: 10001

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must develop and implement a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan must include the requirements in paragraphs 40CFR63.866(a) and 40CFR63.6(e)(3).

Excess emissions during startup, shutdown or malfunction will not be considered violations of the applicable requirements if the procedures of the SSM plan are followed during the episode.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 36: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63, Subpart DDDDD

Item 36.1:

The Compliance Certification activity will be performed for the Facility.

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must be in compliance with the requirements of 40CFR63 Subpart DDDDD not later than 13 September 2007.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

****** Emission Unit Level ******

Condition 37: Emission Point Definition By Emission Unit

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-PAPER

Emission Point: 00041



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Height (ft.): 25 Diameter (in.): 6
NYTMN (km.): 4860. NYTME (km.): 629.

Emission Point: 00047
Height (ft.): 9 Diameter (in.): 62
Building: 4

Emission Point: 00048
Height (ft.): 9 Diameter (in.): 62
Building: 4

Emission Point: 00049
Height (ft.): 11 Diameter (in.): 62
Building: 4

Emission Point: 00050
Height (ft.): 59 Diameter (in.): 60
Building: 4

Emission Point: 00051
Height (ft.): 75 Diameter (in.): 24
Building: 4

Emission Point: 00052
Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00053
Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00054
Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00055
Height (ft.): 83 Diameter (in.): 58
Building: 4

Emission Point: 00056
Height (ft.): 83 Diameter (in.): 62
Building: 4

Emission Point: 00057
Height (ft.): 79 Diameter (in.): 62
Building: 4



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00058 Height (ft.): 80	Diameter (in.): 72	Building: 4
Emission Point: 00059 Height (ft.): 60	Diameter (in.): 36	Building: 4
Emission Point: 00060 Height (ft.): 81	Diameter (in.): 36	Building: 4
Emission Point: 00061 Height (ft.): 80	Length (in.): 58	Width (in.): 43 Building: 4
Emission Point: 00062 Height (ft.): 80	Diameter (in.): 59	Building: 4
Emission Point: 00063 Height (ft.): 80	Diameter (in.): 59	Building: 4
Emission Point: 00064 Height (ft.): 81	Diameter (in.): 50	Building: 4
Emission Point: 00065 Height (ft.): 81	Length (in.): 60	Width (in.): 50 Building: 4
Emission Point: 00066 Height (ft.): 81	Length (in.): 60	Width (in.): 50 Building: 4
Emission Point: 00067 Height (ft.): 80	Diameter (in.): 60	Building: 4

Item 37.2:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: 0-WWTRT		
Emission Point: 00031 Height (ft.): 25	Length (in.): 60	Width (in.): 24



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

NYTMN (km.): 4860. NYTME (km.): 629.

Emission Point: 00035
Height (ft.): 24 Diameter (in.): 36
NYTMN (km.): 4860. NYTME (km.): 629.

Emission Point: 00046
Height (ft.): 36 Diameter (in.): 4
NYTMN (km.): 4860. NYTME (km.): 629.

Item 37.3:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: B-PLANT

Emission Point: 00004
Height (ft.): 136 Diameter (in.): 42
NYTMN (km.): 4860. NYTME (km.): 629.

Emission Point: 00078
Height (ft.): 91 Diameter (in.): 36
Building: 6

Emission Point: 00079
Height (ft.): 91 Diameter (in.): 36
Building: 6

Emission Point: 00080
Height (ft.): 91 Diameter (in.): 46
Building: 6

Emission Point: 00081
Height (ft.): 91 Diameter (in.): 46
Building: 6

Emission Point: 00082
Height (ft.): 91 Diameter (in.): 48
Building: 6

Emission Point: 00083
Height (ft.): 91 Diameter (in.): 83
Building: 6

Item 37.4:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: P-OWERH

New York State Department of Environmental Conservation
Permit ID: 5-1548-00008/00081 Facility DEC ID: 5154800008



Emission Point: 00044
Height (ft.): 205 Diameter (in.): 155
NYTMN (km.): 4860.223 NYTME (km.): 629.031

Item 37.5:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: P-ULPIN

Emission Point: 00084
Height (ft.): 81 Diameter (in.): 49
Building: 6

Emission Point: 00085
Height (ft.): 91 Diameter (in.): 60
Building: 6

Emission Point: 00086
Height (ft.): 35 Diameter (in.): 43
Building: 6

Emission Point: 00088
Height (ft.): 91 Diameter (in.): 6
Building: 6

Emission Point: 00089
Height (ft.): 68 Diameter (in.): 18
Building: 29

Emission Point: 00090
Height (ft.): 25 Diameter (in.): 12
Building: 6

Emission Point: 00091
Height (ft.): 68 Diameter (in.): 24
Building: 29

Emission Point: 00095
Height (ft.): 91 Diameter (in.): 18
Building: 6

Emission Point: 00096
Height (ft.): 91 Diameter (in.): 18
Building: 6

Emission Point: 00098



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Height (ft.): 35	Diameter (in.): 6	Building: 19
Emission Point: 00100 Height (ft.): 25	Length (in.): 36	Width (in.): 38 Building: 6
Emission Point: 00105 Height (ft.): 136	Diameter (in.): 22	Building: 6
Emission Point: 00106 Height (ft.): 201	Diameter (in.): 56	Building: 29
Emission Point: 00107 Height (ft.): 102	Diameter (in.): 30	Building: 6

Item 37.6:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: R-CAUST

Emission Point: 00005 Height (ft.): 80 NYTMN (km.): 4860.67	Diameter (in.): 54 NYTME (km.): 628.809
Emission Point: 00006 Height (ft.): 47 NYTMN (km.): 4860.223	Diameter (in.): 18 NYTME (km.): 629.031
Emission Point: 00008 Height (ft.): 40 NYTMN (km.): 4860.223	Diameter (in.): 12 NYTME (km.): 629.031
Emission Point: 00018 Height (ft.): 37 NYTMN (km.): 4860.223	Diameter (in.): 6 NYTME (km.): 629.031
Emission Point: 00019 Height (ft.): 31 NYTMN (km.): 4860.223	Diameter (in.): 6 NYTME (km.): 629.031
Emission Point: 00020 Height (ft.): 36 NYTMN (km.): 4860.223	Diameter (in.): 6 NYTME (km.): 629.031



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00034			
Height (ft.): 40	Diameter (in.): 18		
NYTMN (km.): 4860.223	NYTME (km.): 629.031		
Emission Point: 00043			
Height (ft.): 40	Diameter (in.): 6		
NYTMN (km.): 4860.223	NYTME (km.): 629.031		
Emission Point: 00108			
Height (ft.): 33	Diameter (in.): 12		Building: 19
Emission Point: 00109			
Height (ft.): 35	Diameter (in.): 7		Building: 19
Emission Point: 00110			
Height (ft.): 35	Diameter (in.): 7		
Emission Point: 00111			
Height (ft.): 50	Diameter (in.): 12		
Emission Point: 00112			
Height (ft.): 50	Diameter (in.): 12		
Emission Point: 00113			
Height (ft.): 37	Diameter (in.): 6		
Emission Point: 00114			
Height (ft.): 30	Diameter (in.): 36		
Emission Point: 00115			
Height (ft.): 32	Diameter (in.): 24		Building: 19
Emission Point: 00116			
Height (ft.): 31	Diameter (in.): 18		Building: 19
Emission Point: 00117			
Height (ft.): 31	Diameter (in.): 18		Building: 19
Emission Point: 00118			
Height (ft.): 30	Diameter (in.): 8		Building: 19



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00119 Height (ft.): 10	Diameter (in.): 8	Building: 19
Emission Point: 00120 Height (ft.): 12	Diameter (in.): 7	Building: 19
Emission Point: 00121 Height (ft.): 35	Diameter (in.): 7	Building: 19
Emission Point: 00123 Height (ft.): 39	Length (in.): 1	Width (in.): 3 Building: 19
Emission Point: 00124 Height (ft.): 25	Diameter (in.): 36	Building: 19

Item 37.7:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: R-ECOV B		
Emission Point: 00001 Height (ft.): 200 NYTMN (km.): 4860.815	Diameter (in.): 74 NYTME (km.): 628.745	Building: 29
Emission Point: 00003 Height (ft.): 169 NYTMN (km.): 4860.799	Diameter (in.): 42 NYTME (km.): 628.718	
Emission Point: 00103 Height (ft.): 200 NYTMN (km.): 4860.842	Diameter (in.): 108 NYTME (km.): 628.765	Building: 29

Item 37.8:

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: W-OODYD		
Emission Point: 00011 Height (ft.): 47 NYTMN (km.): 4860.223	Diameter (in.): 44 NYTME (km.): 629.031	



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00017			
Height (ft.): 43	Diameter (in.): 29		
NYTMN (km.): 4860.223	NYTME (km.): 629.031		
Emission Point: 00068			
Height (ft.): 35	Diameter (in.): 44		Building: 16
Emission Point: 00069			
Height (ft.): 35	Diameter (in.): 44		Building: 54
Emission Point: 00070			
Height (ft.): 25	Diameter (in.): 44		Building: 16
Emission Point: 00071			
Height (ft.): 25	Diameter (in.): 17		Building: 54
Emission Point: 00099			
Height (ft.): 35	Diameter (in.): 17		Building: 54

Condition 38: Process Definition By Emission Unit
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 201-6

Item 38.1:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-PAPER
Process: 119 Source Classification Code: 3-07-013-99

Process Description:

The paper mill converts pulp to various finished products via nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Emission Source/Control: 10041 - Process

Emission Source/Control: 10047 - Process

Emission Source/Control: 10048 - Process

Emission Source/Control: 10049 - Process



- Emission Source/Control: 10050 - Process
- Emission Source/Control: 10051 - Process
- Emission Source/Control: 10052 - Process
- Emission Source/Control: 10053 - Process
- Emission Source/Control: 10054 - Process
- Emission Source/Control: 10055 - Process
- Emission Source/Control: 10056 - Process
- Emission Source/Control: 10057 - Process
- Emission Source/Control: 10058 - Process
- Emission Source/Control: 10059 - Process
- Emission Source/Control: 10060 - Process
- Emission Source/Control: 10061 - Process
- Emission Source/Control: 10062 - Process
- Emission Source/Control: 10063 - Process
- Emission Source/Control: 10064 - Process
- Emission Source/Control: 10065 - Process
- Emission Source/Control: 10066 - Process
- Emission Source/Control: 10067 - Process

Item 38.2:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: 0-WWTRT

Process: 122

Source Classification Code: 3-07-001-21

Process Description:

The wastewater treatment process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration and sludge dewatering and disposal.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Emission Source/Control: 10031 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 10035 - Process

Emission Source/Control: 10046 - Process

Emission Source/Control: 10127 - Process

Item 38.3:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-PLANT

Process: 116

Source Classification Code: 3-07-001-15

Process Description:

The bleach plant whitens brown pulp for paper production.

Emission Source/Control: 10094 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10004 - Process

Item 38.4:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-PLANT

Process: 117

Source Classification Code: 3-07-001-15

Process Description:

Processes that do not vent to the bleach plant scrubber include: the second bleaching stage (#20 tower), the fourth bleaching stage (#40 tower) and four bleached pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission Source/Control: 10078 - Process

Emission Source/Control: 10079 - Process

Emission Source/Control: 10080 - Process

Emission Source/Control: 10081 - Process

Emission Source/Control: 10082 - Process

Emission Source/Control: 10083 - Process

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Item 38.5:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 106

Source Classification Code: 1-02-004-01

Process Description:

Firing No. 6 fuel oil or waste fuel type "A" in the power boiler.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING

Item 38.6:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 107

Source Classification Code: 1-02-009-02

Process Description:

Firing bark and wood in the power boiler. The bark/wood firing rate shall not exceed 547 wet tons per day.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING

Item 38.7:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 108

Source Classification Code: 1-02-009-02



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Process Description:

The power boiler firing dewatered secondary biosolids produced in the on-site wastewater treatment plant. The dewatered secondary biosolids shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) dewatered biosolids with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered biosolids fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of dewatered biosolids to the woodyard.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING

Item 38.8:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 109

Source Classification Code: 1-02-009-02

Process Description:

Firing primary clarifier fiber in the power boiler. The dewatered primary clarifier fiber shall be mixed with the wood/bark fuel in the woodyard prior to feeding to the bark hogger according to the following procedure: Mix one front end loader bucket (3 cubic yards) fiber with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered primary clarifier fiber fed to the boiler shall not exceed 40 cubic yards per day.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 38.9:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 111

Source Classification Code: 1-02-007-99

Process Description:

Non-condensable gases (NCGs) recovered by the pulping and chemical recovery processes are treated by thermal oxidation in the power boiler. The NCGs are collected by a network of fans and piping and fed to the power boiler.

Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: 11075 - Process

Item 38.10:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH

Process: 113

Source Classification Code: 1-02-009-02

Process Description:

Firing rejected digester knots in the power boiler. The knots shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) knots with a minimum of 30 cubic yards of wood/bark. The total quantity of knots fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of knots to the woodyard.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 38.11:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-ULPIN

Process: 120

Source Classification Code: 3-07-001-99

Process Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulping and washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA.

Emission Source/Control: 10084 - Process

Emission Source/Control: 10085 - Process

Emission Source/Control: 10086 - Process

Emission Source/Control: 10088 - Process

Emission Source/Control: 10089 - Process

Emission Source/Control: 10090 - Process

Emission Source/Control: 10091 - Process

Emission Source/Control: 10095 - Process



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Source/Control: 10096 - Process

Emission Source/Control: 10097 - Process

Emission Source/Control: 10098 - Process

Emission Source/Control: 10100 - Process

Emission Source/Control: 10105 - Process

Emission Source/Control: 10106 - Process

Emission Source/Control: 10107 - Process

Item 38.12:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-ULPIN

Process: 124

Source Classification Code: 3-07-001-99

Process Description:

Venting non-condensable gases to the atmosphere from the non-condensable gas collection system.

Emission Source/Control: 10107 - Process

Item 38.13:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-CAUST

Process: 114

Source Classification Code: 3-07-001-22

Process Description:

The recausticizing area clarifies green liquor from the smelt dissolving tank, produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers, and clarifies white liquor slurry producing white liquor for use in the digester.

Emission Source/Control: 10125 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10006 - Process

Emission Source/Control: 10008 - Process

Emission Source/Control: 10018 - Process

New York State Department of Environmental Conservation
Permit ID: 5-1548-00008/00081 Facility DEC ID: 5154800008



- Emission Source/Control: 10019 - Process
- Emission Source/Control: 10020 - Process
- Emission Source/Control: 10034 - Process
- Emission Source/Control: 10043 - Process
- Emission Source/Control: 10108 - Process
- Emission Source/Control: 10109 - Process
- Emission Source/Control: 10110 - Process
- Emission Source/Control: 10111 - Process
- Emission Source/Control: 10112 - Process
- Emission Source/Control: 10113 - Process
- Emission Source/Control: 10114 - Process
- Emission Source/Control: 10115 - Process
- Emission Source/Control: 10116 - Process
- Emission Source/Control: 10117 - Process
- Emission Source/Control: 10118 - Process
- Emission Source/Control: 10119 - Process
- Emission Source/Control: 10120 - Process
- Emission Source/Control: 10123 - Process
- Emission Source/Control: 10124 - Process
- Emission Source/Control: 10126 - Process

Item 38.14:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-CAUST
Process: 115 Source Classification Code: 3-07-001-06
Process Description:
 The lime kiln converts lime mud to burnt lime through a

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



process called "calcining".

Emission Source/Control: 10077 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 10005 - Process

Item 38.15:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
Process: 103
Process Description:
Babcock and Wilcox recovery furnace fired on black liquor.
Source Classification Code: 3-07-001-10

Emission Source/Control: 10101 - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10104 - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10001 - Process

Item 38.16:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
Process: 104
Process Description:
Babcock and Wilcox recovery furnace fired on 1.5% sulfur #6 fuel oil.
Source Classification Code: 1-02-004-01

Emission Source/Control: 10001 - Process

Item 38.17:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
Process: 105
Process Description:
Smelt dissolving tank where smelt from a recovery furnace is dissolved in weak wash or water to produce green liquor.
Source Classification Code: 3-07-001-05

Emission Source/Control: 10102 - Control
Control Type: WET SCRUBBER

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Emission Source/Control: 10003 - Process

Item 38.18:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: W-OODYD

Process: 101

Source Classification Code: 3-07-008-21

Process Description:

Chips pneumatically blown to chip piles through five discharge points.

Emission Source/Control: 10068 - Process

Emission Source/Control: 10069 - Process

Emission Source/Control: 10070 - Process

Emission Source/Control: 10071 - Process

Emission Source/Control: 10099 - Process

Item 38.19:

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: W-OODYD

Process: 102

Source Classification Code: 3-07-008-22

Process Description:

Chips pneumatically blown to woodroom through two cyclones.

Emission Source/Control: 10011 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 10017 - Control

Control Type: SINGLE CYCLONE

Emission Source/Control: 10068 - Process

**Condition 39: Emissions from existing sources
Effective between the dates of 01/10/2007 and 01/09/2012**

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 39.1:

This Condition applies to Emission Unit: 0-PAPER



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 39.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 40: Emissions from existing sources
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 40.1:

This Condition applies to Emission Unit: 0-WWTRT

Item 40.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 41: Emissions from existing sources
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 41.1:

This Condition applies to Emission Unit: B-PLANT

Item 41.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 42: Bleaching Systems - Closed-vent System and Control Device Requirements
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.445(b), Subpart S

Item 42.1:

This Condition applies to Emission Unit: B-PLANT

Item 42.2:

The equipment at each bleaching stage where chlorinated compounds are introduced shall be enclosed and vented into a closed vent system and routed to a control device that meets one or more of the requirements in conditions under §63.445(c). The enclosures and closed vent system shall meet the requirements specified in conditions under §63.450.

Condition 43: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.445(c)(2), Subpart S

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control device used to reduce chlorinated HAP emissions shall achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP. Emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority. The test shall measure the treatment outlet device concentration of either:

- 1) chlorine using EPA Method 26A as modified by 40CFR63.457(b)(5)(ii) or
- 2) the sum of all individual chlorinated HAPs using a method that has been demonstrated to the USEPA administrator's satisfaction.

Parameter Monitored: CHLORINE

Upper Permit Limit: 10 parts per million (by volume)

Reference Test Method: 40CFR60 Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 44: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.450(d), Subpart S

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §63.445 shall comply with either of the following requirements:

1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. This will consist of a pressure indicator with a maximum pressure of 2 inches of water; or

2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. The valve or closure mechanism shall be inspected at least monthly to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Parameter Monitored: PRESSURE

Upper Permit Limit: 2 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 15-MINUTE ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Applicable Federal Requirement: 40CFR 63.453(c), Subpart S

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Process: 116

Emission Source: 10094

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IP Ticonderoga uses an alternative monitoring system in lieu of the requirement to operate a continuous monitoring system to measure the scrubber vent gas inlet flow. the vent gas flowrate is monitored by the use of two zero speed switches on the scrubber induced draft fan.

Downtime of the scrubber induced draft fan will be reported as part of the semi-annual MACT report.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 46: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.453(c), Subpart S

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Process: 116

Emission Source: 10094

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE

Item 46.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the bleach plant scrubber liquid flow rate at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. The average scrubber liquid flow rate must be maintained at or above 550 gallons per minute during each 3-hour averaging period except during periods of malfunction.

Corrective action consistent with the SSM plan must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart S sources located elsewhere in the permit.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 550 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 47: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.453(c), Subpart S

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Process: 116

Emission Source: 10094

Regulated Contaminant(s):

CAS No: 007782-50-5

CHLORINE

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the bleach plant scrubber liquid effluent pH at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. The average scrubber liquid effluent pH must be maintained at or above 10.7 during each 3-hour averaging period except during periods of malfunction.

Corrective action consistent with the SSM plan must be implemented any time the 3-hour average scrubber liquid effluent pH is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart S sources located elsewhere in the permit.

Parameter Monitored: ACIDITY/ALKALINITY

Lower Permit Limit: 10.7 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 48: Submissions to the Department.

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-2.1

Item 48.1:

This Condition applies to Emission Unit: P-OWERH

Item 48.2: Each submission under the NOx Budget Trading Program shall be submitted, signed and certified by the NOx authorized account representative for each NOx Budget source on behalf of which the submission is made. Each submission shall include a certification statement (as stated in paragraph 204-2.4(a)(4)) by the NOx authorized account representative.

Condition 49: Content of reports and compliance certifications.

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-4.1

Item 49.1:

This Condition applies to Emission Unit: P-OWERH

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Item 49.2: The NOx authorized account representative shall include in the compliance certification report the following elements, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx Budget emissions limitation for the control period covered by the report:

- (1) Identification of each NOx Budget unit; and
- (2) In the compliance certification report the NOx authorized account representative shall certify, based on reasonable inquiry of those persons with primary responsibility for operating the source and the NOx Budget units at the source in compliance with the NOx Budget Trading Program, whether each NOx Budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx Budget Trading Program applicable to the unit, including:
 - (i) Whether the unit was operated in compliance with the NOx Budget emissions limitation;
 - (ii) Whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with Subpart 204-8;
 - (iii) Whether all the NOx emissions from the unit, or a group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with Subpart 204-8. If conditional data were reported, the owner or operator shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report resubmissions has been made;
 - (iv) Whether the facts that form the basis for certification under Subpart 204-8 of each monitor at the unit or a group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under Subpart 204-8, if any, has changed; and
 - (v) If a change is required to be reported under item (iv) above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor recertification.

Condition 50: Submission of NOx allowance transfers.
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-7.1

Item 50.1:

This Condition applies to Emission Unit: P-OWERH

Item 50.2: The NOx authorized account representatives seeking recordation of a NOx allowance transfer shall submit the transfer to the Administrator. To be considered correctly submitted, the NOx allowance transfer shall include the following elements in a format specified by the Administrator:

- (a) The numbers identifying both the transferor and transferee accounts;
- (b) A specification by serial number of each NOx allowance to be transferred; and
- (c) The printed name and signature of the NOx authorized account representative of the transferor



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

account and the date signed.

Condition 51: General provisions.
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 51.1:

This Condition applies to Emission Unit: P-OWERH

Item 51.2: The owners and operators, and to the extent applicable, the NOx authorized account representative of a NOx Budget unit, shall comply with the monitoring and reporting requirements as provided in this Subpart and in Subpart H of 40 CFR Part 75. For purposes of complying with such requirements, the definitions in Section 204-1.2 and in 40 CFR 72.2 shall apply, and the terms "affected unit," "designated representative," and "continuous emission monitoring system" (or "CEMS") in 40 CFR Part 75 shall be replaced by the terms "NOx Budget unit," "NOx authorized account representative," and "continuous emission monitoring system" (or "CEMS"), respectively, as defined in Section 204-1.2.

Condition 52: Prohibitions.
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 52.1:

This Condition applies to Emission Unit: P-OWERH

Item 52.2: No owner or operator of a NOx Budget unit or a non-NOx Budget unit monitored under 40 CFR 75.72(b)(2)(ii) shall:

- (1) use any alternative monitoring system, alternative reference method, or any other alternative for the required continuous emission monitoring system without having obtained prior written approval in accordance with Section 204-8.6;
- (2) operate the unit so as to discharge, or allow to be discharged, NOx emissions to the atmosphere without accounting for all such emissions in accordance with the applicable provisions of this Subpart and 40 CFR Part 75 except as provided for in 40 CFR 75.74;
- (3) disrupt the continuous emission monitoring system, any portion thereof, or any other approved emission monitoring method, and thereby avoid monitoring and recording NOx mass emissions discharged into the atmosphere, except for periods of recertification or periods when calibration, quality assurance testing, or maintenance is performed in accordance with the applicable provisions of this Subpart and 40 CFR Part 75 except as provided for in 40 CFR 75.74; and
- (4) permanently discontinue use of the continuous emission monitoring system, any component thereof, or any other approved emission monitoring system under this Subpart, except under any one of the following circumstances:

(i) The owner or operator is monitoring emissions from the unit with another certified monitoring system approved, in accordance with the applicable provisions of this Subpart and 40 CFR Part 75, by the Department for use at that unit that provides emission data for the same pollutant or parameter as the



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

discontinued monitoring system; or

(ii) The NO_x authorized account representative submits notification of the date of certification testing of a replacement monitoring system in accordance with Paragraph 204-8.2(b)(2).

Condition 53: Requirements for installation, certification, and data accounting.

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 53.1:

This Condition applies to Emission Unit: P-OWERH

Item 53.2: The owner or operator of each NO_x Budget unit must meet the following requirements.

These provisions also apply to a unit for which an application for a NO_x Budget opt-in permit is submitted and not denied or withdrawn, as provided in Subpart 204-9:

- (1) Install all monitoring systems required under this Subpart for monitoring NO_x mass. This includes all systems required to monitor NO_x emission rate, NO_x concentration, heat input, and air or fuel flow, in accordance with 40 CFR 75.71 and 75.72.
- (2) Install all monitoring systems for monitoring heat input, if required under Section 204-8.7 for developing NO_x allowance allocations.
- (3) Successfully complete all certification tests required under Section 204-8.2 and meet all other provisions of this Subpart and 40 CFR Part 75 applicable to the monitoring systems under paragraphs (a)(1) and (2) of this section.
- (4) Record and report data from the monitoring systems under paragraphs (a)(1) and (2) of this section.

Condition 54: Requirements for recertification of monitoring systems.

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.2

Item 54.1:

This Condition applies to Emission Unit: P-OWERH

Item 54.2: Whenever the owner or operator makes a replacement, modification, or change in a certified monitoring system that the Administrator or the Department determines significantly affects the ability of the system to accurately measure or record NO_x mass emissions or heat input or to meet the requirements of 40 CFR 75.21 or Appendix B to 40 CFR Part 75, the owner or operator shall recertify the monitoring system according to 40 CFR 75.20(b). Furthermore, whenever the owner or operator makes a replacement, modification, or change to the flue gas handling system or the unit's operation that the Administrator or the Department determines to significantly change the flow or concentration profile, the owner or operator shall recertify the continuous emissions monitoring system according to 40 CFR 75.20(b). Examples of changes which require recertification include: replacement of the analyzer, change in location or orientation of the sampling probe or site, or changing of flow rate monitor polynomial coefficients.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Condition 55: Out of control periods.
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.3

Item 55.1:

This Condition applies to Emission Unit: P-OWERH

Item 55.2: Whenever any monitoring system fails to meet the quality assurance requirements of Appendix B of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

Condition 56: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.4

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The Authorized Account Representative for a NO_x Budget unit shall submit written notice to the Department and the USEPA Administrator in accordance with the requirements of this subpart as follows:

All monitoring plans or monitoring plan modifications; compliance certifications, recertifications and quarterly QA/QC reports; and, petitions for alternative monitoring, shall be submitted to the USEPA Administrator (or his/her representatives) as well as two copies to the Department (one copy to the Regional Air Pollution Control Engineer (RAPCES) in the regional office and one one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office. All Authorized Account Representative changes shall be sent to the NYSDEC central office.

All quarterly emission data shall be electronically filed with the USEPA Clean Air Markets Division with a copy (disc or hard copy) to the NYSDEC offices.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



The address for the USEPA Administrator is as follows:

USEPA Clean Air Markets Division
401 M Street SW (6204J)
Washington D.C. 20460

CEM Coordinator
USEPA-Region 2
2890 Woodbridge Avenue
Edison, N.J. 08837

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring and Enforcement
625 Broadway, 2nd Floor
Albany N.Y. 12233-3258

ACR changes should be sent to the attention of:

NYSDEC
Stationary Source Planning Section
Bureau of Air Quality Planning
625 Broadway, 2nd Floor
Albany NY 12233-3251

The address for the RAPCE is as follows:

Region 5 Suboffice
Hudson Street Extension
P.O. Box 220
Warrensburg, NY 12885

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 57: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 204-8.7

Item 57.1:

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Emission Unit: P-OWERH

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a unit that elects to monitor and report NOx Mass emissions using a NOx concentration system and a flow system shall also monitor and report heat input at the unit level using the procedures set forth in 40 CFR Part 75.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 58: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-1.7(c)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Measurements must be made daily of the rate of each fuel burned. The gross heat content and ash content of each fuel burned must be determined at least once each week.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 59: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-1.7(e)

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Item 59.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall submit a written report to the Department quarterly. These quarterly reports shall include:

- a. a summary of all emission limit violations;
- b. a summary of CEM operations, including downtime and out-of-control periods;
- c. a summary of quarterly audit results;
- d. descriptions of any significant changes in the process, control equipment or CEM system; and
- e. the time and date each scrubber cleaning commences and ends;
- f. the chemical makeup and quantity of the acid solution used in the cleaning process;
- g. a description of any planned scrubber modifications and any updates to the scrubber cleaning protocol since the previous quarterly report;
- h. the maximum rolling 3-hour and 24-hour average SO₂ emissions resulting from the scrubber cleaning (3-hour rolling averages in excess of 435 pounds per hour and 24-hour rolling averages in excess of 309 pounds per hour shall be reported as excess emissions)
- i. SO₂ monitoring data, in electronic format, for all periods of boiler operation during the calendar quarter including the date, time, 1-hour average SO₂ emissions, 3-hour average emissions, and 24-hour average SO₂ emissions.

Conditions a. through d. are based on the special conditions of the PSD permit issued in August 1995.

Conditions e. through i. are based on Schedule A of Order on Consent # R5-2265-98-07.

For the purposes of this permit, excess emissions indicated by the CEM system of SO₂ or NO_x other than startups, shutdowns and malfunctions (as defined in 40CFR60, Subpart A) are considered violations of the applicable emission limits. The quarterly report shall be in the format given in Section 10 of NYSDEC's Air Guide 34. Equivalent formats may be accepted, subject to the review and approval of the Department.

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



The facility shall maintain a file of all measurements, daily zero and span checks, CEM system performance evaluations and repairs and maintenance to the system for a period of five years from the date of occurrence. These records must be available for inspection by Department personnel during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 3 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-2.3(b)(1)

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the power boiler as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification to the permit.

Waste oil generated on site (lubricating, hydraulic and



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not contaminated with chemical waste,
Combustion efficiency testing is performed within 60 days of first use of waste oil,
the quantity does not exceed 10,000 gallons per year and,
the waste oil is blended with #6 oil at a ratio of not more than 1 gallon waste oil to 100 gallons #6 oil.

Quantities of waste oil used must be recorded on each date it is blended with the #6 oil and the records maintained at the facility.

Parameter Monitored: COMBUSTION EFFICIENCY

Lower Permit Limit: 99 percent

Reference Test Method: method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 61: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 227-1.2

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 61.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

The firing rate of bark and wood shall not exceed 547 wet tons per day. Dewatered secondary biosolids, rejected wood knots or primary clarifier fiber may be substituted for wood or bark at the ratio of 1 part alternative fuel to 10 parts wood or bark - not to exceed the daily maximum of 40 cubic yards for any one alternative fuel. A log shall be maintained on-site which indicates the date and volume of each delivery of alternative fuel to the woodyard.

Parameter Monitored: WOOD

Upper Permit Limit: 547 tons per day

Monitoring Frequency: DAILY

Averaging Method: 24-HOUR MAXIMUM - NOT TO BE EXCEEDED
MORE THAN ONCE PER CALENDAR YEAR

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 227-1.2(a)(3)

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 62.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of particulates shall not exceed a rate of 0.10 pounds per million Btus. Stack testing to demonstrate compliance with this limit will be performed once during the permit term unless additional testing is required by the permitting authority.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 63: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 227-2.4(a)

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NO_x emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. During startup, NO_x emissions shall not exceed 122 pounds per hour averaged over the first 24 hours of operation. This equates to 80% of allowable emissions during normal operating conditions and applies only during ozone season.

The NO_x CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Manufacturer Name/Model Number: Thermo Environmental Model 42C

Upper Permit Limit: 122 pounds per hour

Reference Test Method: Appx PS-2

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 3 calendar month(s).

Condition 64: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.443(d)(4), Subpart S

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH
Process: 111

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Non condensible gases from the pulping process shall be controlled by introducing them into the flame zone of the power boiler. Venting gases to the atmosphere or to the boiler when it is not firing shall be reported in semi-annual NESHAP report.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 65: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 227-1.3(a)

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Condition 66: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 227-2.4(a)(2)

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. NOx emissions shall not exceed 0.25 lbs/mmBtu. This limit applies for all periods except during the first 24 hours of startup. Compliance with this emission limit shall be determined on a 24-hour average in accordance with the provisions of 6NYCRR Paragraph 227-2.6(a)(1). From October 1 to April 30, the non-ozone season, a 30 day rolling average may be used to demonstrate compliance.

The NOx CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Manufacturer Name/Model Number: Thermo Environmental model 42C

Upper Permit Limit: 0.25 pounds per million Btus

Reference Test Method: Appx PS-2

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 3 calendar month(s).

Condition 67: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of particulates (measured by method 5) shall not exceed 0.11 lbs/mmBtu. Particulate emission testing shall be conducted once per permit term unless additional testing is required by the permitting authority. Emission testing shall be conducted in accordance with 6NYCRR Subpart 202-1.

Upper Permit Limit: 0.11 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 68: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Description:

The facility must continuously calculate and record SO₂ emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. SO₂ emissions shall not exceed 309 lb/hr (rolling 24 hour average).

The SO₂ CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. Either a certified flow monitor or the most restrictive F-factor for the multiple fuel mix shall be used to measure stack flowrate.

Manufacturer Name/Model Number: Thermo Environmental 43 CHL

Upper Permit Limit: 309 pounds per hour

Reference Test Method: 40CFR60 Appx B PS2

Monitoring Frequency: CONTINUOUS

Averaging Method: 24-HR ROLLING AVG., CALCULATED EA. HR
AS THE AVG OF THE PAST 24 OPERATING
HRS

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 3 calendar month(s).

Condition 69: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record SO₂ emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

SO₂ emissions shall not exceed 435 lb/hr (rolling 3 hour average).

The SO₂ CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. Either a certified flow monitor or the most restrictive F-factor for the multiple fuel mix shall be used to measure stack flowrate.

Manufacturer Name/Model Number: Thermo Environmental 43 CHL
Upper Permit Limit: 435 pounds per hour
Reference Test Method: 40CFR60 Appx B PS2
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 3 calendar month(s).

Condition 70: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.443(d), Subpart S

Item 70.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 70.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

HAP emissions from the digester system (LVHC system), turpentine system (LVHC system), evaporator system (LVHC system), knoter or screen system (HVLC system), pulp washing system (HVLC system), and weak liquor storage tank (HVLC system) shall be vented to a closed vent system and routed to the power boiler for thermal destruction. Emissions may be vented to the atmosphere only in accordance with the Ticonderoga Mill's Startup, Shutdown and Malfunction Plan and per 40CFR 63.443(e). Note that



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Consent Order #1743 has been interpreted as being more stringent in terms of the NCG gas collection and treatment system. As a result, total NCG vent time (both HVLC and LVHC) must be less than 1% of the operating time as expressed as emission rate potential of total sulfur. This is inclusive of venting associated with SSM events.

When the power boiler is not in operation and exclusive of venting allowances, these HAP emissions must be diverted to an alternate control device which achieves at least 80% control or the pulping process must be stopped so that no HAP emissions are created. Diversion to the alternate control device will not exceed 1% of the time that the pulping process is in operation. This constitutes a system with greater than 99% overall control efficiency. 99% control efficiency is required under consent order #1743 executed on September 23, 1974.

Control efficiency of the alternate control device shall be demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 71: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.446(e)(1), Subpart S

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Treat pulping process condensates containing a total of



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

at least 11.1 pounds methanol per ton of oven dried pulp (ODP) by recycling the condensate; using it as shower water in No. 2 brown stock washer. Condensate collection and treatment must continue at all times except for periods of startup, shutdown or malfunction. The quantity of shower water and the methanol concentration of the condensate will be calculated daily to determine the pounds per ton treated over the previous 15 days.

Parameter Monitored: METHYL ALCOHOL

Lower Permit Limit: 11.1 pounds per ton

Monitoring Frequency: DAILY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 72: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.450(d), Subpart S

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 72.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443, shall comply with either of the following requirements:

- 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. This will consist of a pressure indicator with a maximum pressure of 2 inches of water except for the following: 8 inches of water for the chip bin; 6 inches of water for the evaporator seal tank and brown stock washer seal tanks; or

2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. The valve or closure mechanism shall be inspected at least monthly to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Parameter Monitored: PRESSURE

Upper Permit Limit: 2 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 15-MINUTE ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 73: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.3

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 73.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emissions of Total Reduced Sulfur (TRS) from the lime kiln shall not exceed 10 ppm or 0.7 pounds per hour (whichever is more restrictive) for more than 60 cumulative minutes per month. At maximum production rate, 0.7 pounds per hour is more restrictive and equates to 7 ppm corrected to 10% oxygen concentration. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system (CEMS) for lime kiln TRS emissions. CEMs must be in operation at all times except during calibration checks, adjustments, and periods of repair. This standard of performance shall not be applicable during a period of 24 hours immediately following commencement of start-up operations of the lime kiln. This is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Graseby STI
Parameter Monitored: TOTAL REDUCED SULFUR
Upper Permit Limit: 0.7 pounds per hour
Reference Test Method: 40CFR60.284 modified
Monitoring Frequency: CONTINUOUS
Averaging Method: CALENDAR MONTH TOTAL
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 3 calendar month(s).

Condition 74: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.10

Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST
Process: 115

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
The RACT analysis completed in May 2006 determined that



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

the lime kiln as it was designed and operated met NO_x RACT. A nitrogen oxide emission limit of 120 parts per million by volume, wet, corrected to 10% oxygen content is established. Emission testing to verify compliance with this limit will be performed once during the permit term; unless additional testing is required by the permitting authority.

Upper Permit Limit: 120 parts per million (by volume)

Reference Test Method: Method 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 75: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 225-2.3(b)(1)

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10005

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 75.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the lime kiln as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

to the permit.

Waste oil generated on site (lubricating, hydraulic and parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not contaminated with chemical waste,

Combustion efficiency testing is performed within 60 days of first use of waste oil,

the quantity does not exceed 10,000 gallons per year and,

the waste oil is blended with #6 oil at a ratio of not more than 1 gallon waste oil to 100 gallons #6 oil.

Quantities of waste oil used must be recorded on each date it is blended with the #6 oil and the records maintained at the facility.

Parameter Monitored: COMBUSTION EFFICIENCY

Lower Permit Limit: 99 percent

Reference Test Method: method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 76: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 76.2:

Compliance Certification shall include the following monitoring:



Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

When lime kiln emissions exceed 4 ppm TRS (adjusted to 10% O₂), supply 0.25 gallons per minute of caustic to the lime kiln scrubber. The permittee shall install, calibrate, operate and maintain a continuous monitor and data recorder for caustic flow rate. This is a requirement of consent order #1743 executed on September 23, 1974.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 0.25 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 3 calendar month(s).

Condition 77: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115 Emission Source: 10077

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 77.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the lime kiln scrubber liquid flow rate at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

procedures in 63.864(j)(3), the average scrubber liquid flow rate must be maintained at or above 145 gallons per minute during each 3-hour averaging period except during periods of malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to an excusable malfunction, constitute a violation of the standard. Corrective action consistent with the SSM plan must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 145 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 78: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the lime kiln scrubber pressure drop at least once every successive 15-minute period must be installed according to



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber pressure drop must be maintained at or above 19.5 inches of water during each 3-hour averaging period except during periods of startup, shutdown or malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to startup, shutdown or malfunction, constitute a violation of the standard.

Corrective action consistent with the SSM plan must be implemented any time the 3-hour average pressure drop across the scrubber is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 19.5 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 79: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

Item 79.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST Emission Point: 00005

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 79.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

the lime kiln will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.15 grains per dry standard cubic foot corrected to 10% oxygen content; unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The lime kiln is also subject to a particulate matter limit under 6NYCRR 212.3. This limit is 0.15 grains per dry standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall apply in the event that the MACT limit is revised.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 80: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.3

Item 80.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 80.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of total reduced sulfur from the recovery furnace shall not exceed 8 ppm (dry - corrected to 8% oxygen) for more than 60 cumulative minutes per day. This corresponds to 10 ppm before adjustment. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system for the recovery



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

furnace emissions. CEMS must be in operation at all times except during calibration checks, adjustments and periods of repair. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations. A limit of 10 ppm is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Graseby STI
Parameter Monitored: TOTAL REDUCED SULFUR
Upper Permit Limit: 8 parts per million (by volume)
Reference Test Method: 40CFR60.284 Modified
Monitoring Frequency: CONTINUOUS
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 3 calendar month(s).

Condition 81: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.3

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 81.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of total reduced sulfur from the recovery furnace shall not exceed 4 ppm (dry - corrected to 8% oxygen) for a daily average. This corresponds to 5 ppm before adjustment. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations of the recovery furnace. A limit of 5 ppm is a requirement

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



of consent order #1743 executed September 23, 1974.

Manufacturer Name/Model Number: Graseby STI
Parameter Monitored: TOTAL REDUCED SULFUR
Upper Permit Limit: 4 parts per million (by volume)
Reference Test Method: 40CFR60.284 modified
Monitoring Frequency: CONTINUOUS
Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN
- APP. A, METHOD 19)
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 3 calendar month(s).

Condition 82: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

Item 82.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B
Process: 103 Emission Source: 10001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 82.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from the recovery furnace will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.03 grains per dry standard cubic foot corrected to 8% oxygen content; unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The recovery furnace is also subject to a particulate matter limit under 6NYCRR 212.4. This limit is 0.05 grains per dry standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall apply in the event that the MACT limit is revised.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Upper Permit Limit: 0.03 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 83: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.864(d), Subpart MM

Item 83.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 83.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A system for monitoring and recording the opacity of the recovery furnace discharge must be installed in each recovery furnace stack. This system must meet the performance, installation and quality assurance requirements outlined in 63.864(d) and 40CFR60 Appendix B PS-1. For all periods of recovery furnace operation, the COMS must be in continuous operation except during calibration checks, zero or span adjustments, or periods of monitor system repair.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 84: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 84.1:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 84.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The owner or operator must implement corrective action, as specified in the start-up, shutdown and malfunction plan, if the combined opacity of the two stacks exceeds 20% for 10 consecutive six minute periods. Combined opacity exceeds 20% when the average opacity of the two stacks exceeds 11%.

Periodic reporting must follow the requirements for MACT Subpart MM sources contained elsewhere in the permit.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk

Parameter Monitored: OPACITY

Upper Permit Limit: 11 percent

Reference Test Method: PS1

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 85: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 85.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

The owner or operators of an existing kraft recovery boiler equipped with an ESP are in violation of the standards of 63.862 when the combined opacity of the two stacks is greater than 35% for 6 percent or more of the operating time within any quarterly period. Combined opacity exceeds 35% when the average of the two stacks is equal to or greater than 20%.
Periodic reporting must follow the requirements for MACT Subpart MM sources contained elsewhere in this permit.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk
Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: PS1
Monitoring Frequency: CONTINUOUS
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.
Subsequent reports are due every 6 calendar month(s).

Condition 86: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.867(b)(3), Subpart MM

Item 86.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B
Process: 103 Emission Source: 10001

Item 86.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator must notify the Administrator before the black liquor solids firing rate for the recovery furnace during any 24 hour period is increased by more than 10% above the level measured during the most recent performance test.

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2007.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Subsequent reports are due every 6 calendar month(s).

Condition 87: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

Item 87.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 87.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from the smelt dissolving tank will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.15 grains per dry standard cubic foot corrected to 8% oxygen content; unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The smelt dissolving tank is also subject to a particulate matter limit under 6NYCRR 212.3. This limit is 0.15 grains per dry standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall apply in the event that the MACT limit is revised.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 88: Compliance Certification
Effective between the dates of 01/10/2007 and 01/09/2012

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 88.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10102

Item 88.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the smelt dissolving tank scrubber liquid flow rate at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber liquid flow rate must be maintained at or above 11.8 gallons per minute during each 3-hour averaging period except during periods of malfunction. Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to an excusable malfunction, constitute a violation of the standard. Corrective action consistent with the SSM plan must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 11.8 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 89: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 89.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10102

Item 89.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

An instrument capable of determining and recording the smelt dissolving tank scrubber pressure drop at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber pressure drop must be maintained at or above 5.5 inches of water during each 3-hour averaging period except during periods of startup, shutdown or malfunction. Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to startup, shutdown or malfunction, constitute a violation of the standard. Corrective action consistent with the SSM plan must be implemented any time the 3-hour average pressure drop across the scrubber is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 5.5 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 90: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.4

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001

Process: 103 Emission Source: 10001

Item 90.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Normal operation while firing black liquor is with both electrostatic precipitators on line. If the older precipitator (source #10101) is off line for maintenance, the boiler may continue to operate at full capacity.

However, when the new precipitator (source #10104) is off line, the firing rate is limited to no more than 1100 lbs per minute of black liquor solids.

This limit may be revised based on the results of an updated stack test. Testing will be required once per permit term unless additional testing is required by the permitting authority.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: OTHER SOLID FUELS

Upper Permit Limit: 1100 pounds per minute

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).

Condition 91: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.10

Item 91.1:

The Compliance Certification activity will be performed for:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Unit: R-ECOV B Emission Point: 00001
Process: 103 Emission Source: 10001

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 91.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in October 1994 concluded that the recovery boiler as it was designed and operated met NO_x RACT. A standard of 100 ppmdv corrected to 8% O₂ is established and emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority.

Upper Permit Limit: 100 parts per million (by volume)

Reference Test Method: USEPA Method 7

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 92: Compliance Certification

Effective between the dates of 01/10/2007 and 01/09/2012

Applicable Federal Requirement: 6NYCRR 212.4

Item 92.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001
Process: 104 Emission Source: 10001

Regulated Contaminant(s):
CAS No: 0NY075-00-0 PARTICULATES

Item 92.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Monitoring Description:

Limit oil use to less than 10% of the total fuel burned in the recovery boiler based on heat input. 10% of heat input is 371,000 MMBTU/yr which equates to 2,470,000 gallons of oil (#6 oil and type A waste fuel combined).

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Upper Permit Limit: 2470 thousand gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2007.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: 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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 93: Contaminant List
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable State Requirement: ECL 19-0301

Item 93.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007782-50-5

Name: CHLORINE

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY500-00-0

Name: TOTAL REDUCED SULFUR

Condition 94: Unavoidable noncompliance and violations
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable State Requirement: 6NYCRR 201-1.4

Item 94.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 95: Air pollution prohibited
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable State Requirement: 6NYCRR 211.2

Item 95.1:

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. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

****** Emission Unit Level ******

Condition 96: Compliance Demonstration
Effective between the dates of 01/10/2007 and 01/09/2012

Applicable State Requirement: 6NYCRR 237-1.4(c)(1)

Item 96.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation
Permit ID: 5-1548-00008/00081 Facility DEC ID: 5154800008



Emission Unit: P-OWERH

Item 96.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This unit's electrical output supplied to the electric grid during a control period (October 1 through April 30) shall be less than or equal to 10 percent of the gross electrical output of the unit. This makes the unit exempt from the requirements of Part 237 except for the provisions of sections 237-1.2, 237-1.3, 237-1.4 and 237-1.7. Reports are submitted to the Regional Air Pollution Engineer with a copy to the NYSDEC Bureau of Stationary Sources and are due June 1 following the control period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION