



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-1548-00008/00081
Effective Date: 03/19/2012 Expiration Date: 03/18/2017

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

Contact: KIRK CARLSON
INTERNATIONAL PAPER MILL MANAGER
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883
(518) 585-5300

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

Contact: DEAN MESSNER
INTERNATIONAL PAPER TICONDEROGA MILL
568 SHORE AIRPORT ROAD
TICONDEROGA, NY 12883
(518) 585-5399

Description:

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: MICHAEL J MCMURRAY
NYSDEC
PO BOX 296
RAY BROOK, NY 12977-0296

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



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, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 5 HEADQUARTERS



DEC GENERAL CONDITIONS

****** General Provisions ******

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted to the Department for approval.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 5 Headquarters
Division of Environmental Permits
Route 86, PO Box 296
Ray Brook, NY 12977-0296
(518) 897-1234

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: 03/19/2012

Permit Expiration Date: 03/18/2017



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 40 CFR Part 68: Accidental release provisions.
- 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 23 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 24 6 NYCRR 211.1: Air pollution prohibited
- 25 6 NYCRR 212.6 (a): Compliance Certification
- 26 6 NYCRR 225-1.2 (d): Compliance Certification
- 27 6 NYCRR 225-2.7: Compliance Certification
- 28 6 NYCRR 243-1.6 (c): NOx Ozone Season Emission Requirements
- 29 6 NYCRR 243-1.6 (d): Excess emission requirements
- 30 6 NYCRR 243-1.6 (e): Recordkeeping and reporting requirements
- 31 6 NYCRR 243-2.1: Authorization and responsibilities of CAIR designated representative
- 32 6 NYCRR 243-8.1: General requirements
- 33 6 NYCRR 243-8.1: Prohibitions
- 34 6 NYCRR 243-8.5 (d): Quarterly reports
- 35 6 NYCRR 243-8.5 (e): Compliance certification
- 36 6 NYCRR 249.3 (f): Compliance Certification
- 37 40CFR 63.8(d)(2), Subpart A: Compliance Certification
- 38 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
- 39 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
- 40 40CFR 63.10, Subpart A: Compliance Certification
- 41 40CFR 63.10, Subpart A: Compliance Certification
- 42 40CFR 63, Subpart S: Compliance Certification



- 43 40CFR 63.454(b), Subpart S: Compliance Certification
- 44 40CFR 63.454(b), Subpart S: Compliance Certification
- 45 40CFR 63, Subpart MM: Compliance Certification

Emission Unit Level

- 46 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 47 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=B-PLANT

- 48 40CFR 63.445(b), Subpart S: Bleaching Systems - Closed-vent System and Control Device Requirements
- 49 40CFR 63.445(c)(2), Subpart S: Compliance Certification
- 50 40CFR 63.450(d), Subpart S: Compliance Certification

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

- 51 40CFR 63.453(c), Subpart S: Compliance Certification
- 52 40CFR 63.453(c), Subpart S: Compliance Certification
- 53 40CFR 63.453(c), Subpart S: Compliance Certification

EU=P-OWERH

- 54 6 NYCRR 200.6: Compliance Certification
- 55 6 NYCRR 225-1.7 (c): Compliance Certification
- 56 6 NYCRR 225-1.7 (e): Compliance Certification
- 57 6 NYCRR 225-2.3 (b) (1): Compliance Certification
- 58 6 NYCRR 227-1.2: Compliance Certification
- 59 6 NYCRR 227-1.2 (a) (3): Compliance Certification
- 60 40CFR 63, Subpart DDDDD: Compliance Certification

EU=P-OWERH,Proc=111

- 61 40CFR 63.443(d)(4), Subpart S: Compliance Certification

EU=P-OWERH,EP=00044

- 62 6 NYCRR 227-1.3 (a): Compliance Certification
- 63 40CFR 52.21(k), Subpart A: Compliance Certification
- 64 40CFR 52.21(k), Subpart A: Compliance Certification
- 65 40CFR 52.21(k), Subpart A: Compliance Certification

EU=P-ULPIN

- 66 40CFR 63.443(d), Subpart S: Compliance Certification
- 67 40CFR 63.446(e)(1), Subpart S: Compliance Certification
- 68 40CFR 63.450(d), Subpart S: Compliance Certification

EU=R-CAUST,Proc=115

- 69 6 NYCRR 212.3: Compliance Certification
- 70 6 NYCRR 212.10: Compliance Certification

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

- 71 6 NYCRR 225-2.3 (b) (1): Compliance Certification

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

- 72 6 NYCRR 212.11 (b) (5): Compliance Certification
- 73 40CFR 63.864(k), Subpart MM: Compliance Certification



74 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-CAUST,EP=00005

75 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

EU=R-ECOV

76 6 NYCRR 212.3: Compliance Certification

77 6 NYCRR 212.3: Compliance Certification

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

78 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

79 40CFR 63.864(d), Subpart MM: Compliance Certification

80 40CFR 63.864(k), Subpart MM: Compliance Certification

81 40CFR 63.864(k), Subpart MM: Compliance Certification

82 40CFR 63.867(b)(3), Subpart MM: Compliance Certification

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

83 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

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

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

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

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

86 6 NYCRR 212.10: Compliance Certification

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

87 6 NYCRR 212.4: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

88 ECL 19-0301: Contaminant List

89 6 NYCRR 201-1.4: Unavoidable noncompliance and violations

90 6 NYCRR 212.3 (a): Emissions from existing sources

Emission Unit Level

EU=P-OWERH,EP=00044

91 6 NYCRR 227-2.4 (a) (1): Compliance Demonstration

92 6 NYCRR 227-2.4 (a) (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 - 6 NYCRR 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 - 6 NYCRR 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 Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR 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 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 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 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 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 - 6 NYCRR 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 order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR 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 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 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 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 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 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 72-0303.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 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 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 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.
- (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.

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 4/30/2012.

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



Condition 6: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 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 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

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Facility DEC ID: 5154800008



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

The address for the RAPCE is as follows:

Region 5 Suboffice
232 Golf Course Road
Warrensburg, NY 12885-1172

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 4/30/2012.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 - Prohibitions
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by



police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

No person shall unnecessarily 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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

Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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
- (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 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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



Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

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 22: Emission Unit Definition

Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1:

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

Item 22.2:

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

Item 22.3:

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, #25 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 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, the spent acid surge tank 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 22.4:

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 22.5:

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, knoter 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 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 brown stock washers, two 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 secondary rejects tank vent to the washed stock 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 evaporator 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.

Building(s): 19



29

6

Item 22.6:

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. The lime kiln primarily burns #6 oil and uses propane as a fuel for startup and process stabilization. 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, lime mud mix tank, lime mud storage tank, mud filter hood vent, and vacuum pumps for the dregs filters and lime mud filter.

Building(s): 19

Item 22.7:

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

Emission Unit: R-ECOV B

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.

Building(s): 29

Item 22.8:

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

Emission Unit: W-OODYD

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
54

Condition 23: Non Applicable requirements
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 23.1:

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.

6 NYCRR 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.

6 NYCRR Subpart 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.

40 CFR 63.443 (a)

Emission Unit: PULPIN Process: 120

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 24: Air pollution prohibited
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 211.1

Item 24.1:

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.



Condition 25: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 03/19/2012 and 03/18/2017

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

Item 26.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 26.2:

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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 4/30/2012.

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

Condition 27: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 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 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.



of the CAIR NOx Ozone Season emissions limitation, then:

(1) the owners and operators of the source and each CAIR NOx Ozone Season unit at the source shall surrender the CAIR NOx Ozone Season allowances required for deduction under section 243-6.5(d)(1) and pay any fine, penalty, or assessment or comply with any other remedy imposed, for the same violations, under the Act or applicable State law; and

(2) each ton of such excess emissions and each day of such control period shall constitute a separate violation of this Subpart, the Act, and applicable State law.

Condition 30: Recordkeeping and reporting requirements
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 243-1.6 (e)

Item 30.1:

Unless otherwise provided, the owners and operators of the CAIR NOx Ozone Season source and each CAIR NOx Ozone Season unit at the source shall keep on site at the source each of the following documents for a period of five years from the date the document is created. This period may be extended for cause, at any time before the end of five years, in writing by the department or the Administrator.

(i) The certificate of representation under section 243-2.4 for the CAIR designated representative for the source and each CAIR NOx Ozone Season unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new certificate of representation under section 243-2.4 changing the CAIR designated representative.

(ii) All emissions monitoring information, in accordance with Subpart 243-8, provided that to the extent that Subpart 243-8 provides for a three-year period for recordkeeping, the three-year period shall apply.

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the CAIR NOx Ozone Season Trading Program.

(iv) Copies of all documents used to complete a CAIR permit application and any other submission under the CAIR NOx Ozone Season Trading Program or to demonstrate compliance with the requirements of the CAIR NOx Ozone Season Trading Program.

Condition 31: Authorization and responsibilities of CAIR designated representative
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 243-2.1

Item 31.1:

Except as provided under section 243-2.2, each CAIR NOx Ozone Season source, including all CAIR NOx Ozone Season units at the source, shall have one and only one CAIR designated representative, with regard to all matters under the CAIR NOx Ozone Season Trading Program concerning the source or any CAIR NOx Ozone Season unit at the source.



The CAIR designated representative of the CAIR NO_x Ozone Season source shall be selected by an agreement binding on the owners and operators of the source and all CAIR NO_x Ozone Season units at the source and shall act in accordance with the certification statement in section 243-2.4(a)(4)(iv).

Upon receipt by the Administrator of a complete certificate of representation under section 243-2.4, the CAIR designated representative of the source shall represent and, by his or her representations, actions, inactions, or submissions, legally bind each owner and operator of the CAIR NO_x Ozone Season source represented and each CAIR NO_x Ozone Season unit at the source in all matters pertaining to the CAIR NO_x Ozone Season Trading Program, notwithstanding any agreement between the CAIR designated representative and such owners and operators. The owners and operators shall be bound by any decision or order issued to the CAIR designated representative by the department, the Administrator, or a court regarding the source or unit.

No CAIR permit will be issued, no emissions data reports will be accepted, and no CAIR NO_x Ozone Season Allowance Tracking System account will be established for a CAIR NO_x Ozone Season unit at a source, until the Administrator has received a complete certificate of representation under section 243-2.4 for a CAIR designated representative of the source and the CAIR NO_x Ozone Season units at the source.

Each submission under the CAIR NO_x Ozone Season Trading Program shall be submitted, signed, and certified by the CAIR designated representative for each CAIR NO_x Ozone Season source on behalf of which the submission is made. Each such submission shall include the following certification statement by the CAIR designated representative: "I am authorized to make this submission on behalf of the owners and operators of the source or units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

Condition 32: General requirements
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 243-8.1

Item 32.1:

The owners and operators, and to the extent applicable, the CAIR designated representative, of a CAIR NO_x Ozone Season unit, shall comply with the monitoring, recordkeeping, 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 243-1.2 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 deemed to refer to the terms "CAIR NO_x Ozone Season unit," "CAIR designated representative," and "continuous emission monitoring system" (or "CEMS") respectively, as defined in section 243-1.2. The owner or operator of a unit that is not a CAIR NO_x Ozone Season unit but that is monitored under 40 CFR 75.72(b)(2)(ii) shall comply with the same monitoring, recordkeeping, and reporting requirements as a CAIR NO_x Ozone Season unit.



'Requirements for installation, certification, and data accounting.' The owner or operator of each CAIR NOx Ozone Season unit shall:

- (1) install all monitoring systems required under this Subpart for monitoring NOx mass emissions and individual unit heat input (including all systems required to monitor NOx emission rate, NOx concentration, stack gas moisture content, stack gas flow rate, CO2 or O2 concentration, and fuel flow rate, as applicable, in accordance with 40 CFR 75.71 and 40 CFR 75.72);
- (2) successfully complete all certification tests required under section 243-8.2 and meet all other requirements of this Subpart and 40 CFR Part 75 applicable to the monitoring systems under paragraph 243-8.1(a)(1); and
- (3) record, report, and quality-assure the data from the monitoring systems under paragraph (a)(1) of this section.

Condition 33: Prohibitions
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 243-8.1

Item 33.1:

No owner or operator of a CAIR NOx Ozone Season unit shall use any alternative monitoring system, alternative reference method, or any other alternative to any requirement of this Subpart without having obtained prior written approval in accordance with section 243-8.6.

No owner or operator of a CAIR NOx Ozone Season unit shall 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.

No owner or operator of a CAIR NOx Ozone Season unit shall 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 or heat input, 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.

No owner or operator of a CAIR NOx Ozone Season unit shall retire or permanently discontinue use of the continuous emission monitoring system, any component thereof, or any other approved monitoring system under this Subpart, except under any one of the following circumstances:

- (i) during the period that the unit is covered by an exemption under section 243-1.5 that is in effect;
- (ii) 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 retired or discontinued monitoring system; or
- (iii) the CAIR designated representative submits notification of the date of certification testing of a replacement monitoring system for the retired or discontinued monitoring system in accordance with section 243-8.2(d)(3)(i).



Item 37.1:

The Compliance Certification activity will be performed for the Facility.

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source that is required to use a CMS and is subject to the monitoring requirements of this section and a relevant standard shall develop and implement a CMS quality control program. As part of the quality control program, the owner or operator shall develop and submit to the Administrator for approval upon request a site specific performance evaluation test plan for the CMS performance evaluation required in paragraph (e)(3)(i) of this section, according to the procedures specified in paragraph (e). Each quality control program shall include a written protocol. The owner or operator shall keep these written procedures on file for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the Administrator. Previous or suspended versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan. Where relevant, e.g., program of corrective action for a malfunctioning CMS, these written procedures may be incorporated as part of the affected source's startup, shutdown and malfunction plan to avoid duplication of planning and recordkeeping efforts.

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 4/30/2012.

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

**Condition 38: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 03/19/2012 and 03/18/2017**

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 38.1:

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 39: §63.10(d) General Reporting Requirements
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 39.1:

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 40: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 40.1:

The Compliance Certification activity will be performed for the Facility.

Item 40.2:

Compliance Certification shall include the following monitoring:

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).

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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 4/30/2012.

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

Condition 41: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 41.1:

The Compliance Certification activity will be performed for the Facility.

Item 41.2:

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 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 4/30/2012.

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

Condition 42: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63, Subpart S

Item 42.1:

The Compliance Certification activity will be performed for the Facility.



Item 42.2:

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)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 43: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 43.1:

The Compliance Certification activity will be performed for the Facility.

Item 43.2:

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 4/30/2012.

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

Condition 44: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 44.1:

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 44.2:

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;



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.

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 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

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

**Condition 46: Emission Point Definition By Emission Unit
Effective between the dates of 03/19/2012 and 03/18/2017**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 46.1:

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

Emission Unit: 0-PAPER

Emission Point: 00041

Height (ft.): 25 Diameter (in.): 6
NYTMN (km.): 4861.192 NYTME (km.): 628.52

Emission Point: 00047

Height (ft.): 9 Diameter (in.): 62
NYTMN (km.): 4861.19 NYTME (km.): 628.523 Building: 4

Emission Point: 00048

Height (ft.): 9 Diameter (in.): 62
NYTMN (km.): 4861.188 NYTME (km.): 628.525 Building: 4

Emission Point: 00049

Height (ft.): 11 Diameter (in.): 62
NYTMN (km.): 4861.186 NYTME (km.): 628.526 Building: 4

Emission Point: 00050

Height (ft.): 59 Diameter (in.): 60
NYTMN (km.): 4861.184 NYTME (km.): 628.529 Building: 4

Emission Point: 00051

Height (ft.): 75 Diameter (in.): 24
NYTMN (km.): 4861.182 NYTME (km.): 628.53 Building: 4

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Emission Point: 00052			
Height (ft.): 80	Length (in.): 59	Width (in.): 39	
NYTMN (km.): 4861.18	NYTME (km.): 628.533	Building: 4	
Emission Point: 00053			
Height (ft.): 80	Length (in.): 59	Width (in.): 39	
NYTMN (km.): 4861.178	NYTME (km.): 628.533	Building: 4	
Emission Point: 00054			
Height (ft.): 80	Length (in.): 59	Width (in.): 39	
NYTMN (km.): 4861.179	NYTME (km.): 628.534	Building: 4	
Emission Point: 00055			
Height (ft.): 83	Diameter (in.): 58		
NYTMN (km.): 4861.189	NYTME (km.): 628.513	Building: 4	
Emission Point: 00056			
Height (ft.): 83	Diameter (in.): 62		
NYTMN (km.): 4861.187	NYTME (km.): 628.515	Building: 4	
Emission Point: 00057			
Height (ft.): 79	Diameter (in.): 62		
NYTMN (km.): 4861.184	NYTME (km.): 628.517	Building: 4	
Emission Point: 00058			
Height (ft.): 80	Diameter (in.): 72		
NYTMN (km.): 4861.181	NYTME (km.): 628.52	Building: 4	
Emission Point: 00059			
Height (ft.): 60	Diameter (in.): 36		
NYTMN (km.): 4861.178	NYTME (km.): 628.522	Building: 4	
Emission Point: 00060			
Height (ft.): 81	Diameter (in.): 36		
NYTMN (km.): 4861.175	NYTME (km.): 628.526	Building: 4	
Emission Point: 00061			
Height (ft.): 80	Length (in.): 58	Width (in.): 43	
NYTMN (km.): 4861.174	NYTME (km.): 628.527	Building: 4	
Emission Point: 00062			
Height (ft.): 80	Diameter (in.): 59		
NYTMN (km.): 4861.173	NYTME (km.): 628.529	Building: 4	
Emission Point: 00063			
Height (ft.): 80	Diameter (in.): 59		
NYTMN (km.): 4861.178	NYTME (km.): 628.525	Building: 4	
Emission Point: 00064			
Height (ft.): 81	Diameter (in.): 50		
NYTMN (km.): 4861.182	NYTME (km.): 628.523	Building: 4	



Emission Point: 00065
Height (ft.): 81 Length (in.): 60 Width (in.): 50
NYTMN (km.): 4861.184 NYTME (km.): 628.52 Building: 4

Emission Point: 00066
Height (ft.): 81 Length (in.): 60 Width (in.): 50
NYTMN (km.): 4861.179 NYTME (km.): 628.528 Building: 4

Emission Point: 00067
Height (ft.): 80 Diameter (in.): 60
NYTMN (km.): 4861.177 NYTME (km.): 628.529 Building: 4

Item 46.2:

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
NYTMN (km.): 4861.262 NYTME (km.): 628.731

Emission Point: 00035
Height (ft.): 24 Diameter (in.): 36
NYTMN (km.): 4861.245 NYTME (km.): 628.71

Emission Point: 00046
Height (ft.): 36 Diameter (in.): 4
NYTMN (km.): 4861.203 NYTME (km.): 628.659

Item 46.3:

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.): 4861.034 NYTME (km.): 628.657

Emission Point: 00078
Height (ft.): 91 Diameter (in.): 36
NYTMN (km.): 4861.022 NYTME (km.): 628.675 Building: 6

Emission Point: 00079
Height (ft.): 91 Diameter (in.): 36
NYTMN (km.): 4861.028 NYTME (km.): 628.664 Building: 6

Emission Point: 00080
Height (ft.): 91 Diameter (in.): 46
NYTMN (km.): 4861.025 NYTME (km.): 628.656 Building: 6

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



NYTMN (km.): 4861.025 NYTME (km.): 628.661 Building: 6

Emission Point: 00082
Height (ft.): 91 Diameter (in.): 48
NYTMN (km.): 4861.02 NYTME (km.): 628.668 Building: 6

Emission Point: 00083
Height (ft.): 91 Diameter (in.): 83
NYTMN (km.): 4861.018 NYTME (km.): 628.657 Building: 6

Item 46.4:

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

Emission Unit: P-OWERH

Emission Point: 00044
Height (ft.): 205 Diameter (in.): 155
NYTMN (km.): 4861.088 NYTME (km.): 628.756

Item 46.5:

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
NYTMN (km.): 4861.051 NYTME (km.): 628.677 Building: 6

Emission Point: 00085
Height (ft.): 91 Diameter (in.): 60
NYTMN (km.): 4861.046 NYTME (km.): 628.672 Building: 6

Emission Point: 00086
Height (ft.): 35 Diameter (in.): 42
NYTMN (km.): 4861.038 NYTME (km.): 628.678 Building: 6

Emission Point: 00088
Height (ft.): 91 Diameter (in.): 6
NYTMN (km.): 4861.027 NYTME (km.): 628.696 Building: 6

Emission Point: 00089
Height (ft.): 68 Diameter (in.): 18
NYTMN (km.): 4861.083 NYTME (km.): 628.706 Building: 29

Emission Point: 00090
Height (ft.): 25 Diameter (in.): 12
NYTMN (km.): 4861.058 NYTME (km.): 628.702 Building: 6

Emission Point: 00091
Height (ft.): 68 Diameter (in.): 24
NYTMN (km.): 4861.063 NYTME (km.): 628.724 Building: 29



Emission Point: 00100
Height (ft.): 25 Length (in.): 36 Width (in.): 38
NYTMN (km.): 4861.03 NYTME (km.): 628.68 Building: 6

Emission Point: 00105
Height (ft.): 136 Diameter (in.): 22
NYTMN (km.): 4861.035 NYTME (km.): 628.663 Building: 6

Emission Point: 00106
Height (ft.): 201 Diameter (in.): 56
NYTMN (km.): 4861.052 NYTME (km.): 628.694 Building: 29

Emission Point: 00107
Height (ft.): 102 Diameter (in.): 30
NYTMN (km.): 4861.044 NYTME (km.): 628.698 Building: 6

Item 46.6:

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

Emission Unit: R-CAUST

Emission Point: 00005
Height (ft.): 80 Diameter (in.): 52
NYTMN (km.): 4860.957 NYTME (km.): 628.803

Emission Point: 00006
Height (ft.): 47 Diameter (in.): 18
NYTMN (km.): 4860.944 NYTME (km.): 628.799

Emission Point: 00008
Height (ft.): 40 Diameter (in.): 12
NYTMN (km.): 4860.933 NYTME (km.): 628.808

Emission Point: 00018
Height (ft.): 37 Diameter (in.): 6
NYTMN (km.): 4860.968 NYTME (km.): 628.802

Emission Point: 00019
Height (ft.): 31 Diameter (in.): 6
NYTMN (km.): 4860.977 NYTME (km.): 628.812

Emission Point: 00020
Height (ft.): 36 Diameter (in.): 6
NYTMN (km.): 4860.985 NYTME (km.): 628.82

Emission Point: 00043
Height (ft.): 60 Diameter (in.): 6
NYTMN (km.): 4860.968 NYTME (km.): 628.825

Emission Point: 00108
Height (ft.): 33 Diameter (in.): 12
NYTMN (km.): 4860.946 NYTME (km.): 628.828 Building: 19



Emission Point: 00109
Height (ft.): 35 Diameter (in.): 7
NYTMN (km.): 4860.958 NYTME (km.): 628.819 Building: 19

Emission Point: 00110
Height (ft.): 35 Diameter (in.): 7
NYTMN (km.): 4860.957 NYTME (km.): 628.834

Emission Point: 00111
Height (ft.): 50 Diameter (in.): 12
NYTMN (km.): 4860.955 NYTME (km.): 628.835

Emission Point: 00112
Height (ft.): 50 Diameter (in.): 12
NYTMN (km.): 4860.951 NYTME (km.): 628.836

Emission Point: 00113
Height (ft.): 37 Diameter (in.): 6
NYTMN (km.): 4860.943 NYTME (km.): 628.827

Emission Point: 00114
Height (ft.): 30 Diameter (in.): 36
NYTMN (km.): 4860.941 NYTME (km.): 628.826

Emission Point: 00115
Height (ft.): 32 Diameter (in.): 24
NYTMN (km.): 4860.94 NYTME (km.): 628.826 Building: 19

Emission Point: 00117
Height (ft.): 31 Diameter (in.): 18
NYTMN (km.): 4860.935 NYTME (km.): 628.822 Building: 19

Emission Point: 00119
Height (ft.): 10 Diameter (in.): 8
NYTMN (km.): 4860.925 NYTME (km.): 628.817 Building: 19

Emission Point: 00121
Height (ft.): 35 Diameter (in.): 7
NYTMN (km.): 4860.926 NYTME (km.): 628.827 Building: 19

Emission Point: 00123
Height (ft.): 39 Length (in.): 1 Width (in.): 3
NYTMN (km.): 4860.94 NYTME (km.): 628.812 Building: 19

Emission Point: 00124
Height (ft.): 25 Diameter (in.): 36
NYTMN (km.): 4860.956 NYTME (km.): 628.828 Building: 19

Emission Point: 00126
Height (ft.): 47 Diameter (in.): 8
NYTMN (km.): 4860.96 NYTME (km.): 628.82



Item 46.7:

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 Diameter (in.): 74
NYTMN (km.): 4861.082 NYTME (km.): 628.789 Building: 29

Emission Point: 00003
Height (ft.): 169 Diameter (in.): 42
NYTMN (km.): 4861.059 NYTME (km.): 628.773

Emission Point: 00103
Height (ft.): 200 Diameter (in.): 108
NYTMN (km.): 4861.1 NYTME (km.): 628.782 Building: 29

Item 46.8:

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

Emission Unit: W-OODYD

Emission Point: 00011
Height (ft.): 47 Diameter (in.): 44
NYTMN (km.): 4860.959 NYTME (km.): 628.741

Emission Point: 00017
Height (ft.): 43 Diameter (in.): 29
NYTMN (km.): 4860.952 NYTME (km.): 628.738

Emission Point: 00068
Height (ft.): 31 Diameter (in.): 44
NYTMN (km.): 4860.912 NYTME (km.): 628.789 Building: 16

Emission Point: 00069
Height (ft.): 31 Diameter (in.): 44
NYTMN (km.): 4860.886 NYTME (km.): 628.823 Building: 54

Emission Point: 00070
Height (ft.): 31 Diameter (in.): 44
NYTMN (km.): 4860.891 NYTME (km.): 628.797 Building: 16

Emission Point: 00071
Height (ft.): 31 Diameter (in.): 17
NYTMN (km.): 4860.871 NYTME (km.): 628.825 Building: 54

Emission Point: 00099
Height (ft.): 31 Diameter (in.): 17
NYTMN (km.): 4860.864 NYTME (km.): 628.812 Building: 54

Condition 47: Process Definition By Emission Unit



Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 47.1:

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 47.2:

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.

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 47.3:

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 47.4:

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).



Process: 108 Source Classification Code: 1-02-009-02

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: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 47.8:

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

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

Item 47.9:

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: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: 11075 - Process

Item 47.10:

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.

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: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 47.11:

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, knoter 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
- 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 47.12:

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 47.13:



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

Emission Source/Control: 10019 - Process

Emission Source/Control: 10020 - 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: 10117 - Process

Emission Source/Control: 10119 - Process

Emission Source/Control: 10123 - Process

Emission Source/Control: 10124 - Process

Emission Source/Control: 10126 - Process



Item 47.14:

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 process called "calcining". The lime kiln primarily burns #6 oil and uses propane as a fuel for startup and process stabilization.

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

Emission Source/Control: 10005 - Process

Item 47.15:

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

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

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

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

Emission Source/Control: 10001 - Process

Item 47.16:

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

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

Emission Source/Control: 10001 - Process

Item 47.17:

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

Emission Unit: R-ECOV B
Process: 105 Source Classification Code: 3-07-001-05
Process Description:
Smelt dissolving tank where smelt from a recovery furnace



is dissolved in weak wash or water to produce green liquor.

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

Emission Source/Control: 10003 - Process

Item 47.18:

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 47.19:

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 48: Bleaching Systems - Closed-vent System and Control Device Requirements
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 48.1:

This Condition applies to Emission Unit: B-PLANT

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Item 48.2:

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 49: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 49.2:

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 50: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017



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

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

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

Item 50.2:

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 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification



Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 51.1:

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 51.2:

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 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 52: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 52.1:

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 52.2:

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 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 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 4/30/2012.

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

Condition 53: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 53.1:

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 53.2:

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 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

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during each 3-hour averaging period except during periods of malfunction.
Corrective action 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 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 54: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 200.6

Item 54.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 54.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

This unit's annual electrical output supplied to the electric grid shall be less than or equal to 10 percent of the gross annual electrical output of the unit. This makes the unit exempt from the requirements of Part 242, except for the provisions of section 242-1.2, section 242-1.3, section 242-1.4 and section 242-1.6.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 55: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 55.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH



Item 55.2:

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 56: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

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 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)

Conditions a. through d. are based on the special



conditions of the PSD permit issued in August 1995.

Conditions e. through h. 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.

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 4/30/2012.
Subsequent reports are due every 3 calendar month(s).

Condition 57: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

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

Item 57.2:

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 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 4/30/2012.

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

Condition 58: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 227-1.2

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES



Item 58.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The firing rate of bark and wood shall not exceed the rate demonstrated during the last particulate compliance test. The current limit is 450 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: 450 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 4/30/2012.

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

Condition 59: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 59.2:

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.

Parameter Monitored: PARTICULATES

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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 60: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63, Subpart DDDDD

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must meet the requirements established under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers. This will also satisfy particulate emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

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 4/30/2012.

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

Condition 61: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: 111

Item 61.2:

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 or with the combustion air 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 4/30/2012.

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

Condition 62: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Emission Point: 00044

Item 62.2:

Compliance Certification shall include the following monitoring:

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

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

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METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 64: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 64.1:

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 64.2:

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. SO₂ emissions shall not exceed 309 lb/hr (rolling 24 hour average). This will also satisfy sulfur dioxide emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

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 4/30/2012.

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

Condition 65: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Item 65.1:

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 65.2:

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. 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 4/30/2012.

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

Condition 66: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

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

Item 66.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

HAP emissions from the digester 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 collected in a closed vent system and routed to the power boiler for thermal destruction 99% or more of the operating time; expressed as emission rate potential of total sulfur. The 1% allowance for uncontrolled venting of these equipment systems is more stringent than allowances authorized by 40 CFR 63.443(e) for LVHC and HVLC systems and is a requirement stemming from Consent Order #1743. The 1% allowance includes all venting resulting from startup, shutdown or periods of malfunction.

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 4/30/2012.

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

Condition 67: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 67.2:

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

Collect pulping process condensates from equipment systems listed in 40CFR63.446(b)(1) through (b)(5) that in total contain at least 11.1 pounds methanol per ton of oven dried pulp (40 CFR 63.446(c)(3) and treat the condensate by recycling it to the Number 2 brown stock washer shower water. The mass of pulping process condensate collected and recycled as shower water will be calculated daily and averaged over 15 days to determine compliance.

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 4/30/2012.

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

Condition 68: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall keep records of the monitored parameters for 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, by complying 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. Pressure, temperature, valve position and rupture disks are used as continuous indicators that gasses are not bypassing the NCG collection system. All measured bypasses are included in the Semi-annual MACT report.

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.

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 4/30/2012.

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

Condition 69: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 69.1:

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 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

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

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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: Thermo Environmental 43C

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 4/30/2012.

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

Condition 70: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.10

Item 70.1:

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 70.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in May 2006 determined that 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 71: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 71.1:

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 71.2:

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 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.

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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 4/30/2012.

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

Condition 72: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 72.1:

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 72.2:

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 4/30/2012.

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

Condition 73: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017



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

Item 73.1:

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 73.2:

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 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 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 4/30/2012.

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

Condition 74: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

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Item 74.1:

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 74.2:

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 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 24 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 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: 24 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 4/30/2012.

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

Condition 75: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 75.1:



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 75.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from 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 76: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 76.1:

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 76.2:

Compliance Certification shall include the following monitoring:

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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 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: Thermo Environmental 43C

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 4/30/2012.

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

Condition 77: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 77.1:

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 77.2:

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

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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 of consent order #1743 executed September 23, 1974.

Compliance with this limit demonstrates that the staged combustion air system is operating properly. This controls SO₂ formation as well and satisfies the SO₂ emission requirements under 6NYCRR part 249 (Best Available Retrofit Technology).

Manufacturer Name/Model Number: Thermo Environmental 43C
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 4/30/2012.
Subsequent reports are due every 3 calendar month(s).

Condition 78: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 78.1:

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 78.2:

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

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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. This will also satisfy particulate emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

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 79: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 79.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 79.2:

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 4/30/2012.

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

Condition 80: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

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Item 80.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 80.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The owner or operator must implement corrective action 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 4/30/2012.

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

Condition 81: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 81.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

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



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

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

Item 83.2:

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 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 84: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 84.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B
Process: 105 Emission Source: 10102

Item 84.2:

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 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 4/30/2012.

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

Condition 85: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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: 105

Emission Source: 10102

Item 85.2:

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 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 4/30/2012.

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

Condition 86: Compliance Certification

Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 212.10

Item 86.1:

The Compliance Certification activity will be performed for:

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 86.2:

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 NOx RACT. A standard of 100 ppmv 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. This will also satisfy nitrogen oxide emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

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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 87: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement: 6 NYCRR 212.4

Item 87.1:

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 87.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

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 THROUGHPUT

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 4/30/2012.

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 88: Contaminant List
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable State Requirement:ECL 19-0301

Item 88.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 007446-09-5
Name: SULFUR DIOXIDE



CAS No: 007782-50-5
Name: CHLORINE

CAS No: 0NY075-00-0
Name: PARTICULATES

CAS No: 0NY100-00-0
Name: HAP

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

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

Condition 89: Unavoidable noncompliance and violations
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable State Requirement: 6 NYCRR 201-1.4

Item 89.1:

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 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 90: Emissions from existing sources
Effective between the dates of 03/19/2012 and 03/18/2017**

Applicable State Requirement:6 NYCRR 212.3 (a)

Item 90.1:

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.

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

**Condition 91: Compliance Demonstration
Effective between the dates of 03/19/2012 and 03/18/2017**

Applicable State Requirement:6 NYCRR 227-2.4 (a) (1)

Item 91.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

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

Item 91.2:

Compliance Demonstration 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

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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.

This limit applies until July 1, 2014, after which a new NOX limit will be in force. A permit modification will be issued to incorporate the new limit.

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

Compliance with the new NOX limit will also satisfy NOX emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

Manufacturer Name/Model Number: Thermo Environmental Model 42C

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.25 pounds per million Btus

Reference Test Method: PS-2

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 4/30/2012.

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

Condition 92: Compliance Demonstration
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable State Requirement: 6 NYCRR 227-2.4 (a) (1)

Item 92.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

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

Item 92.2:

Compliance Demonstration 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. During startup, NOx 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

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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

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 122 pounds per hour

Reference Test Method: PS-2

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 4/30/2012.

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

