PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-1548-00008/00081
Mod 0 Effective Date: 03/19/2012 Expiration Date: 03/18/2017

Mod 1 Effective Date: 07/27/2012 Expiration Date: 03/18/2017

Mod 2 Effective Date: 01/30/2013 Expiration Date: 03/18/2017

Mod 3 Effective Date: 04/17/2014 Expiration Date: 03/18/2017

Mod 4 Effective Date: 01/19/2015 Expiration Date: 03/18/2017

Mod 5 Effective Date: 04/30/2015 Expiration Date: 03/18/2017

Mod 6 Effective Date: 09/09/2015 Expiration Date: 03/18/2017

Mod 7 Effective Date: 01/19/2016 Expiration Date: 03/18/2017

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

Contact: JAY WILSON
INTERNATIONAL PAPER CO
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883
(518) 585-5313

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:
Fully integrated pulp and paper manufacturer of printing papers. Facility processes hardwood and softwood pulp log and chip raw materials using the kraft process. Converted kraft pulp is washed, bleached and prepared for finishing by pa per machines. Parent rolls produced by the machines are rewound and cut into smaller various width rolls for in-house finishing or direct shipment to customers. Rolls sent for in-house finishing are cut into sheets to meet customer specifications, packa ged and stored in on-site warehousing to await shipping to customer.

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: ERIN L BURNS
NYSDEC - REGION 5
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
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 prior to actual transfer of ownership.

Condition 7-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 7-1.1:
The permittee must submit a renewal application at least 180 days before expiration of permits for both Title V and State Facility Permits.

Item 7-1.3:
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 4: 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

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:INTERNATIONAL PAPER COMPANY
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

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LIST OF CONDITIONS

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3-3 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
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3-5 6 NYCRR 201-6.4 (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
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3-9 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
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3-11 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
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20 40 CFR Part 68: Accidental release provisions.
21 40CFR 82, Subpart F: Recycling and Emissions Reduction
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27 6 NYCRR 225-2.7: Compliance Certification
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37 40CFR 63.8(d)(2), Subpart A: Compliance Certification
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75 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

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4-7 6 NYCRR 212.4: Compliance Certification

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81 40CFR 63.864(k), Subpart MM: Compliance Certification
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6-10 6 NYCRR 225-1.4 (a): Compliance Demonstration

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6-11 6 NYCRR 225-1.4 (a): 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, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;
(3) During the period of the emergency the facility owner 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 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 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 201-6.2 (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 201-6.2 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (a) (6)**

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

Item I: **Severability - 6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (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 3-1: **Fees**
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)

Item 3-1.1:
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 3-2: **Recordkeeping and Reporting of Compliance Monitoring**
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (c)

Item 3-2.1:
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 201-6.2 of Part 201.

Condition 3-3: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)

Item 3-3.1:
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 3-4: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (3) (ii)

Item 3-4.1:
The Compliance Certification activity will be performed for the Facility.

Item 3-4.2:
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 201-6.2(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 may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 3-5: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (e)

Item 3-5.1:
The Compliance Certification activity will be performed for the Facility.

Item 3-5.2:
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 annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section
USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer
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 3-6: Recycling and Salvage
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 3-6.1:
Where practical, the owner or operator of 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 3-7: Exempt Sources - Proof of Eligibility
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-7.1:
The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 3-8: Trivial Sources - Proof of Eligibility
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-8.1:
The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 3-9: Requirement to Provide Information
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)

Item 3-9.1:
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 3-10: Right to Inspect
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)

Item 3-10.1:
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 3-11: Off Permit Changes
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

Item 3-11.1:
No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

Condition 19: Required Emissions Tests
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 19.1:
For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

Condition 20: Accidental release provisions.
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40 CFR Part 68

Item 20.1:
If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;

b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:

1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,

2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

Condition 21: Recycling and Emissions Reduction
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(From Mod 7):
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 22.2(From Mod 7):
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 22.3(From Mod 6):
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 22.4(From Mod 6):
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 natural gas, #2 fuel oil, # 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-condensible 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(From Mod 6):
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: P-ULPIN
Emission Unit Description:
This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulp washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA. The digestor 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-condensible 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 evaporater seal tanks, 3 precipitator mix tanks, an economizer liquor mix tank, and a salt cake mix tank. The non-condensible gas system delivers NCGs to the power boiler for thermal treatment.

Building(s): 19
29
6

Item 22.6(From Mod 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 burns natural gas, #2 fuel oil or #6 fuel oil and uses propane or natural gas 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(From Mod 6):

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

Emission Unit: R-ECOVB

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 #6 or #2 fuel 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(From Mod 6):

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 3-12: Progress Reports Due Semiannually
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)

Item 3-12.1:
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 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 in 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-OODYD

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

Condition 36: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 249.3 (f)

Item 36.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

Emission Unit: P-OWERH
Process: 106 Emission Source: 10044

Emission Unit: R-ECOVB
Process: 103 Emission Source: 10001

Item 36.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The emission limits in this permit for NOx, SO2, and/or PM10 established under Part 249 are based on New York's Best Available Retrofit Technology (BART) Rule (6 NYCRR Part 249), are effective on the date of this permit's issuance, and are state-enforceable. Federal enforceability of these facility-specific requirements is effective on the date on which these emission limits, as submitted to EPA as a revision to New York State's Implementation Plan for Regional Haze, are published in the Federal Register.

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

Applicable Federal Requirement:40CFR 63.8(d)(2), Subpart A

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 quaqlity 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 7-1: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 01/19/2016 and 03/18/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 7-1.1:
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 of 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 3-13: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 3-13.1:
The Compliance Certification activity will be performed for the Facility.

Item 3-13.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

For each emission source subject to 40 CFR 63 Subpart MM 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 relevent parts of Subpart 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.
Any time an action taken during a startup, shutdown or malfunction event that caused the source to exceed any applicable emission limitation in the relevant emission standards is not consistent with the procedures specified in the mill's SSM plan, the mill shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event.
These notifications meet the requirements listed in 40 CFR 63.10(d)(5)(ii).

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 10/30/2014.
Subsequent reports are due every 6 calendar month(s).

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).
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 3-14: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable Federal Requirement:40CFR 63, Subpart S

Item 3-14.1:
The Compliance Certification activity will be performed for the Facility.

Item 3-14.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

In response to an action to enforce the standards set forth in 40 CFR 63.443(c) and (d), 63.445(b) and (c), 63.446(c), (d) and (e), or 63.450(d), the owner or operator may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction as defined at 40 CFR 63.2. The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation that it has met the requirements set forth in 40 CFRR 63.456(a). This

affirmative defense report shall be included in the first periodic compliance, deviation or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard. If such compliance, deviation or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation or excess emission report due after the initial occurrence of the violation of the relevant standard.

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 10/30/2014.
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;
(4) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
(5) Repair methods applied in each attempt to repair the leak or defect;
(6) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
(7) The expected date of successful repair of the defect

or leak if the repair is not completed within 15 days;
(8) The date of successful repair of the leak or defect;
(9) The position and duration of opening of bypass line valves and the condition of any valve seals; and
(10) The duration of the use of bypass valves on computer controlled valves.

Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

Applicable Federal Requirement:40CFR 63, Subpart MM

Item 45.1:
The Compliance Certification activity will be performed for the facility:
The Compliance Certification applies to:

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

Emission Unit: R-ECOVB
Process: 103 Emission Source: 10001

Emission Unit: R-ECOVB
Process: 105 Emission Source: 10003

Item 45.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator must develop and implement a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan must include the requirements in paragraphs 40CFR63.866(a) and 40CFR63.6(e)(3).
Excess emissions during startup, shutdown or malfunction will not be considered violations of the applicable requirements if the procedures of the SSM plan are followed during the episode.

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(From Mod 7):
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

Emission Point: 00127
Height (ft.): 62 Diameter (in.): 6
NYTMN (km.): 4861.12 NYTME (km.): 628.57

Item 46.2(From Mod 7):
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 46.3(From Mod 6):
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 Building: 4

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

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 46.4(From Mod 6):
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(From Mod 6):
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(From Mod 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(From Mod 6):
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: R-ECOVB

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(From Mod 6):
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(From Mod 7):
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: 10033 - Control
Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 10032 - Process
Design Capacity: 40,000 gallons

Emission Source/Control: 10035 - Process

Emission Source/Control: 10046 - Process

Emission Source/Control: 10127 - Process

Item 47.2(From Mod 7):
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 47.3(From Mod 7):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: B-PLANT
Process: 117 Source Classification Code: 3-07-001-15
Process Description:
Processes that do not vent to the bleach plant scrubber include: the second bleaching stage (#20 tower), the fourth bleaching stage (#40 tower) and four bleached pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission Source/Control: 10078 - Process

Emission Source/Control: 10079 - Process

Emission Source/Control: 10080 - Process

Emission Source/Control: 10081 - Process

Emission Source/Control: 10082 - Process

Emission Source/Control: 10083 - Process

Item 47.4(From Mod 6):
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: 10103 - Control
Control Type: FABRIC FILTER

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 47.5(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH
Process: 106 Source Classification Code: 1-02-004-01
Process Description:
Firing No. 6 fuel oil or waste fuel type "A" in the power boiler.

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

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

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

Emission Source/Control: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Item 47.6(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH
Process: 107 Source Classification Code: 1-02-009-02
Process Description:
Firing bark and wood in the power boiler. The bark/wood firing rate shall not exceed 450 wet tons per day.

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

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

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

Emission Source/Control: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Item 47.7(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH
Process: 108 Source Classification Code: 1-02-009-02
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

Emission Source/Control: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Item 47.8(From Mod 6):
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(From Mod 6):
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-condensible 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: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 11075 - Process

Item 47.10(From Mod 6):
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(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH
Process: 125 Source Classification Code: 1-02-006-01
Process Description: Firing natural gas in the power boiler.

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

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

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

Emission Source/Control: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Item 47.12(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-OWERH
Process: 126 Source Classification Code: 1-02-005-01
Process Description: Firing #2 fuel oil in the power boiler.

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

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

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

Emission Source/Control: W-ESP - Control
Control Type: ELECTROSTATIC PRECIPITATOR

Item 47.13(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: P-ULPIN
Process: 120 Source Classification Code: 3-07-001-99

Process Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulping and washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unti 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 47.14(From Mod 6):
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-condensible gases to the atmosphere from the non-condensible gas collection system.

Emission Source/Control: 10107 - Process

Item 47.15(From Mod 6):
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: 10076 - 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: 10121 - Process

Emission Source/Control: 10123 - Process

Emission Source/Control: 10124 - Process

Emission Source/Control: 10126 - Process

Item 47.16(From Mod 6):
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 burns natural gas, #2 fuel oil and/or #6 fuel oil. Propane or natural gas are used for startup and process stabilization.

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

Emission Source/Control: 10005 - Process

Item 47.17(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
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 47.18(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

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

Emission Source/Control: 10101 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

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

Emission Source/Control: 10001 - Process

Item 47.19(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
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 47.20(From Mod 6):
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: R-ECOVB
Process: 127 Source Classification Code: 1-02-005-01
Process Description:
Babcock and Wilcox recovery furnace fired on #2 fuel oil.

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

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

Emission Source/Control: 10001 - Process

Item 47.21(From Mod 6):
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 47.22(From Mod 6):
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

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 3-15: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-15.1:
The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

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

Item 3-15.2:

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 by September 7, 2015 and thereafter within 60 months from the date of the previous performance test unless additional testing is required by the permitting authority. In addition to state reporting requirements, results of the performance test must be submitted to EPA and meet the reporting requirements of 40 CFR 63.455(h). 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 TOTAL 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 mavimum 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 7-2: Compliance Certification
Effective between the dates of 01/19/2016 and 03/18/2017

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

Item 7-2.1:
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 7-2.2:
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 10.5 during each 3-hour averaging period.
Corrective action must be implemented any time the 3-hour average scrubber liquid effluent pH is below the value established during the performance tests.

Parameter Monitored: ACIDITY/ALKALINITY
Lower Permit Limit: 10.5 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 4/30/2016.
Subsequent reports are due every 6 calendar month(s).

Condition 3-16: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-16.1:
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 3-16.2:
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. The fan must be in continuous operation. Corrective action must be implemented any time the scrubber fan is not operational.
Downtime of the scrubber induced draft fan and zero speed switches 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 10/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 3-17: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-17.1:
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 3-17.2:
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.
Corrective action must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests.

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 10/30/2014.
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 4-1: Compliance Certification
Effective between the dates of 01/19/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 225-1.6 (a)

Item 4-1.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 4-1.2:
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 NOx 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 4/30/2015.
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 TOTAL 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
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 6-1: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 227-2.5 (c)

Item 6-1.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

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

Item 6-1.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:
The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance.

Per the NOx RACT determination submitted in December 2011, the emission limit for the power boiler, on or after July 1, 2015, is 0.23 lbs of NOx emissions per mmBtu. This limit applies for all periods except during the first 24 hours of startup. Compliance with this limit shall be determined on a 24-hour average. From October 1 to April 30, the non-ozone season, a 30 day rolling average may be used to determine compliance.
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 42iLS
Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 0.23 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 10/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 4-2: Compliance Certification
Effective between the dates of 01/19/2015 and 03/18/2017

Applicable Federal Requirement:40CFR 63, Subpart DDDDD

Item 4-2.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 4-2.2:
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. EPA has granted the facility a one year extension so the effective compliance date is January 31, 2017. This will also satisfy particulate emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).
The permittee must submit periodic reports to EPA (Air Compliance Branch) that describe progress in implementing the project milestones that will enable the facility to achieve compliance by no later than January 31, 2017. The progress reports must be submitted on a quarterly basis with the first report due on May 15, 2015 and continue until the facility comes into compliance.

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

Condition 6-2: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 225-1.4 (a)

Item 6-2.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH
Process: 106

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 6-2.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:
The facility may purchase and burn number 6 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions:
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 1.12 lbs/mmBtu. This limit does not apply during the first 24 hours of startup.
The 1.12 lb/mmBtu limit is calculated based on mixture of 80% fuel oil and 20% wood (heat content). If the quarterly average fuel mixture drops below 20% wood (as submitted in the facility's quarterly report) the emission rate limit will be recalculated and reduced.
This limit is in effect until August 1, 2015.

Manufacturer Name/Model Number: Thermo Environmental 43iHL
Parameter Monitored: SULFUR DIOXIDE
Upper Permit Limit: 1.12 pounds per million Btus
Reference Test Method: 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 10/30/2015.
Subsequent reports are due every 3 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 4-4: Compliance Certification
Effective between the dates of 01/19/2015 and 03/18/2017

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

Item 4-4.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH
Process: 125 Emission Source: 10044

Item 4-4.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The current power boiler NOx RACT analysis addresses emissions created while burning #6 fuel oil. This analysis will become obsolete once the source burns natural gas as its primary fuel. A new RACT analysis must be submitted to the permit administrator within sixteen months of the date that the power boiler begins firing natural gas on a regular basis.

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

Condition 6-3: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 225-1.4 (a)

Item 6-3.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH
Process: 126

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 6-3.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:
The facility may purchase and burn number 2 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions:
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 0.68 lbs/mmBtu while burning #2 fuel oil. This limit does not apply during the first 24 hours of startup.
The 0.68 lb/mmBtu limit is calculated based on mixture of 80% fuel oil and 20% wood (heat content). If the quarterly average fuel mixture drops below 20% wood (as submitted in the facility's quarterly report) the emission rate limit will be recalculated and reduced.
This limit is in effect until August 1, 2015.

Manufacturer Name/Model Number: Thermo Environmental 43 iHL
Parameter Monitored: SULFUR DIOXIDE
Upper Permit Limit: 0.68 pounds per million Btus
Reference Test Method: 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 10/30/2015.
Subsequent reports are due every 3 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 of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 6-4: Compliance Certification

Effective between the dates of 09/09/2015 and 03/18/2017

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

Item 6-4.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

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

Item 6-4.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:
The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. 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 operating conditions and applies only during ozone season.

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

Manufacturer Name/Model Number: Thermo Environmental Model 42iLS
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 10/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 6-5: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

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

Item 6-5.1:
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 6-5.2:
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 iHL
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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).

Condition 6-6: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

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

Item 6-6.1:
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 6-6.2:
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 monitoror the most restrictive F-factor for the multiple fuel mix shall be used to measure stack flowrate.

Manufacturer Name/Model Number: Thermo Environmental 43 iHL
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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 63.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

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

Item 63.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

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

Upper Permit Limit: 0.11 pounds per million Btus
Reference Test Method: EPA Method 5
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 3-21: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-21.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

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

Item 3-21.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
HAP emissions from the digester system (LVHC system), evaporator system (LVHC system), knotter 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. Corrective action must be implemented when venting occurs.
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 10/30/2014.
Subsequent reports are due every 6 calendar month(s).

Condition 3-22: Compliance Certification
Effective between the dates of 04/17/2014 and 03/18/2017

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

Item 3-22.1:
The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

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

Item 3-22.2:
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. This limit must be met at all times. Corrective action must be implemented any time the limit is not being met.

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 10/30/2014.
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 TOTAL 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 valvce 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 6-7: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 6-7.1:
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 6-7.2:
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 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 43 i
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 10/30/2015.
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 NOx 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 4-6: Compliance Certification
Effective between the dates of 01/19/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.10

Item 4-6.1:
The Compliance Certification activity will be performed for:

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

Item 4-6.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The current lime kiln NOx RACT analysis addresses emissions created while burning #6 fuel oil. This analysis will become obsolete once the source burns natural gas as its primary fuel. A new RACT analysis must be submitted to the permit administrator within sixteen months of the date that the kiln begins firing natural gas on a regular basis.

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

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 TOTAL 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.

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 ammended 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

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 ammended 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 6-8: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 6-8.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB

Regulated Contaminant(s):
CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 6-8.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)
Monitoring Description:

Emissions of total reduced sulfur from the recovery furnace shall not exceed 4 ppm (dry - corrected to 8% oxygen) for a daily average. This corresponds to 5 ppm before adjustment. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations of the recovery furnace. A limit of 5 ppm is a requirement 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 43i
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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).

Condition 6-9: Compliance Certification
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.3

Item 6-9.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB

Regulated Contaminant(s):
CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 6-9.2:
Compliance Certification shall include the following monitoring:

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

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 43i
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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).

Condition 4-7: Compliance Certification
Effective between the dates of 01/19/2015 and 03/18/2017

Applicable Federal Requirement:6 NYCRR 212.4

Item 4-7.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB

Item 4-7.2:
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.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: FUEL OIL
Parameter Monitored: FUEL OIL
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 4/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 5-1: Compliance Certification
Effective between the dates of 04/30/2015 and 03/18/2017

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

Item 5-1.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB
Process: 103 Emission Source: 10001

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

Item 5-1.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Normal operation while firing black liquor is with all three precipitator cells in service. If the north and/or south cells are out of service, the rolling three hour average liquor firing rate is limited to 1450 pounds per minute of black liquor solids. Stack testing for particulate emissions will be required once per permit term unless additional testing is required by the permitting authority.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: LIQUOR
Upper Permit Limit: 1450 pounds per minute
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 5-2: Compliance Certification
Effective between the dates of 04/30/2015 and 03/18/2017

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

Item 5-2.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB
Process: 103 Emission Source: 10001

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

Item 5-2.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
Normal operation while firing black liquor is with all three precipitator cells in service. If the east cell (source 10104) is out of service, the rolling three hour average liquor firing rate is limited to 1200 pounds per minute of black liquor solids. Stack testing for particulate emissions will be required once per permit term unless additional testing is required by the permitting authority.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: LIQUOR
Upper Permit Limit: 1200 pounds per minute
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2015.
Subsequent reports are due every 6 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-ECOVB
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 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-ECOVB
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

Item 80.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB
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-ECOVB
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 opacity exceeds 35% when the average of the two stacks is equal to or greater than 20%.
Periodic reporting must follow the requirements for MACT Subpart MM sources contained elsewhere in this permit.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk
Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: PS1
Monitoring Frequency: CONTINUOUS
Averaging Method: 6 MINUTE AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 82: Compliance Certification
Effective between the dates of 03/19/2012 and 03/18/2017

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

Item 82.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB
Process: 103 Emission Source: 10001

Item 82.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 83: 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 83.1:
The Compliance Certification activity will be performed for:

Emission Unit: R-ECOVB
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-ECOVB
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 ammended 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-ECOVB
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 ammended 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-ECOVB 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 ppmdv corrected to 8% O2 is established and emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority. This will also satisfy nitrogen oxide emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

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

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: TOTAL HAP

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

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

Condition 3-23: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/17/2014 and 03/18/2017

Applicable State Requirement:6 NYCRR 201-1.4

Item 3-23.1:
(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or

malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

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 4-8: Compliance Demonstration
Effective between the dates of 01/19/2015 and 03/18/2017

Applicable State Requirement:6 NYCRR 225-1.5 (c)

Item 4-8.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH

Item 4-8.2:
Compliance Demonstration 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 oil and wood burned must be determined at least once each week.

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 4/30/2015.
Subsequent reports are due every 6 calendar month(s).

Condition 6-10: Compliance Demonstration
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable State Requirement:6 NYCRR 225-1.4 (a)

Item 6-10.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH
Process: 106

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 6-10.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The facility may purchase and burn number 6 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions.
SO2 emissions in pounds per million Btu must be less than the amount calculated by the following: SO2 = (0.55 times the percent of total heat input provided by oil + 3.4 times the percent of total heat input provided by wood) divided by 100. This is monitored daily on a 30 day rolling average and becomes effective August 1, 2015.

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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).

Condition 6-11: Compliance Demonstration
Effective between the dates of 09/09/2015 and 03/18/2017

Applicable State Requirement:6 NYCRR 225-1.4 (a)

Item 6-11.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH
Process: 126

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 6-11.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The facility may purchase and burn number 2 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions.
SO2 emissions in pounds per million Btu must be less than

the amount calculated by the following: SO2 = (0.00165 times the percent of total heat input provided by oil + 3.4 times the percent of total heat input provided by wood) divided by 100. This is monitored daily on a 30 day rolling average and becomes effective August 1, 2015.

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 10/30/2015.
Subsequent reports are due every 3 calendar month(s).