



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-4144-00004/00027
Mod 0 Effective Date: 02/01/2000 Expiration Date: No expiration date.
Mod 2 Effective Date: 05/09/2006 Expiration Date: No expiration date.
Mod 3 Effective Date: 12/08/2008 Expiration Date: No expiration date.

Permit Issued To: SCA TISSUE NORTH AMERICA LLC
1451 MCMAHON DR
NEENAH, WI 54956

Facility: SCA TISSUE N A
1 RIVER ST
SOUTH GLENS FALLS, NY 12803

Contact: BARBARA HEMKEN
SCA TISSUE NORTH AMERICA
ONE RIVER ST
SOUTH GLENS FALLS, NY 12803
(518) 742-5627

Description:

The river street mill is an integrated paper mill meaning that both pulping and paper making are performed on-site. Each of these operations, along with certain "support operations" are discussed in greater detail below. The paper mill has a maximum production capacity of approximately 270 tons per day (tpd). Most paper produced is converted on-site (i.e.-cut to size, embossed as required, and wrapped and boxed for shipment. Brief descriptions of individual emitting units, operations that either do not or are believed not to potentially emit air contaminants, and identified mill support operations are given below. In some instances, regulatory applicability with respect to select operation is also discussed. Boiler house: the SCA SGF co-generation facility that used to supply steam to the SCA SGF facility was demolished but the Auxiliary boiler (#CBN03) still remains. This permit modification is to add the use of the 95 MMBtu/hr natural gas fired SGF #CBN03 boiler (Combustion Engineering Tampella design) to the permit as the primary provider of steam to the SCA facility. Additionally, the mill has two (2) boilers each of which has its own stack. One of these is a natural gas fired keeler package boiler with a maximum rated heat input of 72 MMBtu/hr. The other is a smaller combustion engineering natural gas fired package boiler with a rated heat input of 45 MMBtu/hr. Although the steam will typically be delivered by the SGF #3 boiler, the mill



boilers can be used to furnish process steam in the event that the SGF #CBN03 is off line. When any of the mill boilers are in use, a portion of the stack gases can be diverted to the Yankee dryer hood (#10 paper machine). This stack gas is used to maintain the internal temperature in the dryer hoods to keep moisture which has been removed from the paper sheet from condensing. Generally, this emitting unit is subject to

- 1) specific portions of 6 NYCRR part 200,
- 2) specific portions of 6 NYCRR Part 201,
- 3) specific portions of 6 NYCRR Part 211,
- 4) specific portions of 6 NYCRR Part 225,
- 5) specific portions of 6 NYCRR Part 227, and
- 6) specific portions of 40 CFR Part 60.

Paper making: as the facility is currently permitted, factors used to estimate emissions from the paper machines have been taken from national council on air and stream improvement (NCASI) technical bulletin #740 entitled: "Volatile Organic Compound emissions from non-chemical pulp and paper mill sources" (07/97). These emission factors are expressed in terms of pounds of air contaminant per air dried ton of paper (adtp). The term air dried ton of paper means that the final moisture content of the paper sheet is in "equilibrium" with the moisture content of the ambient air. The modifications to the boilers are expected to have minimal impact on production-related emissions. The production rates for all three (3) paper machines used to estimate emissions reflect maximum design capacities subsequent to the future modifications completed. Therefore, ERP, PTE, and actual emissions delineated in this permit application should be representative of both maximum (i.e.-hourly/daily/yearly) emissions and the future "status quo". More detailed descriptions of the individual paper machines (each of which has been separated into an individual "Emission Unit") are included herein. Paper production (EU's: P-NYG01; P-NYG02; P-NYG03): the South Glens Falls mill operates three (3) paper machines, each of which are described in detail, below. Generally, however, each machine consists of three (3) more or less distinct sections:

- 1) a forming section or "wet end",
- 2) a "yankee dryer; and
- 3) an after dryer section paper machines (nos. 9 and 10) only.

Generally, this emitting unit is subject to:

- 1) specific portions of 6 NYCRR Part 200;
- 2) specific portions of 6 NYCRR Part 201;
- 3) specific portions of 6 NYCRR Ppart 211; and



4) specific portions of 6 NYCRR Part 212.

Converting: the only other process activity performed at the mill is converting. In the converting process, large rolls of various grades of toweling and tissue from the paper machines are cut, rolled, wrapped, and boxed for shipment to end users. None of these operations emit air contaminants to the outdoor atmosphere. In the converting area itself, there are no visually observable fugitive dust or particulate matter emissions. Small amounts of adhesives are used to seal individual wrappers. But these are fugitive to the room and are "de minimis" in quantity. Therefore, no Emission Unit has been included in this application for the converting operation. Miscellaneous support activities: in addition to the activities discussed above, the mill conducts a number of support activities including, not limited to the following:

- 1) machine shop: includes solvent parts degreasing, sand blasting, and welding (w/hood exhaust to atmosphere)
- 2) diesel fire pump: 340 hp diesel engine which is a component of a fire suppression system; pump is periodically "exercised".
- 3) numerous chemical storage tanks.

Where appropriate, emissions from these sources have been included in the facility emission range codes where appropriate.

Wastewater treatment: presently, the mill treats 2.2 million gallons per day (mgd) of process wastewater. Effluent from the wastewater treatment plant (WWTP) is discharged directly to the Hudson River. The WWTP consists of primary clarification, biological treatment, and sludge dewatering.

Regulated air contaminants: in general, regulated air contaminants which the mill has the potential to emit are presented in tabular form below:

PM10 NY075005
PM NY075000
SO2 07446095
NOx NY210000
CO 00630080
VOC NY998000
HAPs NY100000
Acetaldehyde 00075070
Methanol 00067561
Biphenyl 00092875



Chloroform 00067663
Phenol 00106952
Formaldehyde 00050000
Toluene 00108883
Methylene Chloride 00075092
Hexane 00110543
Benzene 0071432

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

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

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
 - Applications for permit renewals, modifications and transfers
 - Applications for Permit Renewals and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Applications for Permit Renewals and Modifications
 - Permit Modifications, Suspensions and Revocations by the Department
 - Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 5 SUBOFFICE
- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG



DEC GENERAL CONDITIONS
****** General Provisions ******
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 3-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 3-1.1:

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 3-1.2:

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 3-1.3:

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 2-1: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Expired by Mod No: 3

Item 2-1.1:

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 2-1.2:

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 2-1.3:

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 3-2: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6NYCRR 621.13

Item 3-2.1:

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

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

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6NYCRR 621.13(a)

Expired by Mod No: 3

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.

Condition 2-2: Permit Modifications, Suspensions and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

Item 2-2.1:

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

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

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department

Applicable State Requirement: 6NYCRR 621.14

Expired by Mod No: 3

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

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

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

Applicable State Requirement: 6NYCRR 621.5(a)

Expired by Mod No: 2



Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 5 Sub-office
Division of Environmental Permits
232 Hudson St, PO Box 220
Warrensburg, NY 12885-0220
(518) 623-1281

Condition 3-3: Submission of application for permit modification or renewal-REGION 5

SUBOFFICE - WARRENSBURG

Applicable State Requirement: 6NYCRR 621.6(a)

Item 3-3.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 5 Sub-office
Division of Environmental Permits
232 Golf Course Road, PO Box 220
Warrensburg, NY 12885-0220
(518) 623-1281



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: SCA TISSUE NORTH AMERICA LLC
1451 MCMAHON DR
NEENAH, WI 54956

Facility: SCA TISSUE N A
1 RIVER ST
SOUTH GLENS FALLS, NY 12803

Authorized Activity By Standard Industrial Classification Code:
2621 - PAPER MILLS EXC BUILDING PAPER
2676 - SANITARY PAPER PRODUCTS

Mod 0 Permit Effective Date: 02/01/2000
date.

Permit Expiration Date: No expiration

Mod 2 Permit Effective Date: 05/09/2006
date.

Permit Expiration Date: No expiration

Mod 3 Permit Effective Date: 12/08/2008
date.

Permit Expiration Date: No expiration



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 and Modifications
 - Permit modifications, suspensions or revocations by the Department
 - Applications for Permit Renewals and Modifications
 - Permit Modifications, Suspensions and Revocations by the Department
 - Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 5 SUBOFFICE
- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 3-1 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 9 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 3-8 6NYCRR 201-7: Facility Permissible Emissions
- *3-9 6NYCRR 201-7: Capping Monitoring Condition
- 3-10 6NYCRR 212.9(b): Compliance Demonstration
- 3-6 6NYCRR 227-1.3: Smoke Emissions
- 3-7 6NYCRR 227-1.6: Corrective Action
- 3-2 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 3-3 40CFR 60.7(b), NSPS Subpart A: Recordkeeping requirements.
- 3-4 40CFR 60.9, NSPS Subpart A: Availability of information.
- 3-5 40CFR 60.14, NSPS Subpart A: Modifications.

Emission Unit Level

EU=1-PAPER

- 25 6NYCRR 212.6(a): Compliance Demonstration

EU=2--MBST

- 3-11 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
- 3-12 40CFR 60.48c(j), NSPS Subpart Dc: Reporting period

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 2-18 ECL 19-0301: Contaminant List
- 2-19 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 26 6NYCRR 201-5: General Provisions
- 27 6NYCRR 201-5: Emission Unit Definition
- 29 6NYCRR 211.2: Air pollution prohibited
- 3-13 6NYCRR 211.2: Compliance Demonstration
- 31 6NYCRR 217-3.2(a): Diesel truck opacity limitation



32 6NYCRR 217-3.2(b): Idling of diesel trucks limited

Emission Unit Level

33 6NYCRR 201-5: Emission Point Definition By Emission Unit

34 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6NYCRR Part 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6NYCRR Part 200.6

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.

Item C: Maintenance of Equipment - 6NYCRR Part 200.7

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.



Item D: Unpermitted Emission Sources - 6NYCRR Part 201-1.2

If an existing emission source was subject to the permitting requirements of 6NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated;

(3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.



Item F: Recycling and Salvage - 6NYCRR Part 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item G: Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 201-1.8

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.

Item H: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 201-3.2(a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item I: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 201-3.3(a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item J: Required Emission Tests - 6 NYCRR Part 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air



pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6NYCRR Part 202-1.

Item K: Visible Emissions Limited - 6 NYCRR Part 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: 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 N: 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.

FEDERAL APPLICABLE REQUIREMENTS



The following conditions are federally enforceable.

Condition 3-1: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-1.8

Item 3-1.1:

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 9: Public Access to Recordkeeping
Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-1.10(a)

Item 9.1:

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Condition 3-8: Facility Permissible Emissions
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7

Item 3-8.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY998-00-0 (From Mod 3) PTE: 95,000 pounds
per year

Name: VOC

Condition 3-9: Capping Monitoring Condition
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 201-7

Item 3-9.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would



otherwise be subject to:

6NYCRR 201-6.1(a)

Item 3-9.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 3-9.3:

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.

Item 3-9.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3-9.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3-9.6:

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

Emission Unit: 1-CLEAN

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 3-9.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Solvent usage for cleaning the paper machine is limited
to 110,000 gallons per year (as currently permitted).

Process Material: SOLVENT

Parameter Monitored: VOLUME

Upper Permit Limit: 110000 gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)



Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 3-10: Compliance Demonstration
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 212.9(b)

Item 3-10.1:

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

Emission Unit: 1-CLEAN

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 3-10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Hourly usage, for any continuous 60 minute period, of
solvent for clean-up of the paper machine fabrics is never
to exceed 52 gallons per machine per hour. This limit
keeps VOC emissions from the source at or below 9.98
pounds per hour.

Process Material: SOLVENT

Parameter Monitored: VOLUME

Upper Permit Limit: 52 gallons per hour

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT
ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

Subsequent reports are due every 12 calendar month(s).

Condition 3-6: Smoke Emissions
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.3

Item 3-6.1:

No person shall operate a stationary combustion installation which emits smoke greater
than the limits listed in this Part.

Condition 3-7: Corrective Action



Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:6NYCRR 227-1.6

Item 3-7.1:

(a) Any person found to have violated any provision of this Part shall not cause, permit or allow operation of the stationary combustion installation involved in the violation unless:

- (1) it is equipped with approved emission control equipment;
- (2) it is rehabilitated or upgraded in an approved manner; or
- (3) the fuel is changed to an acceptable type.

(b) The commissioner may seal such stationary combustion installation so as to prevent any operation if the conditions of paragraph (a)(1)-(3) above are not met within the time provided by the order of final determination issued in the case of the violation.

(c) No person shall cause, permit or allow operation of any stationary combustion installation sealed by the commissioner in accordance with this section.

(d) No person except the commissioner or his representative shall remove, tamper with or destroy any seal affixed to any stationary combustion installation.

Condition 3-2: EPA Region 2 address.

Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.4, NSPS Subpart A

Item 3-2.1:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

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



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six 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: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 3-11: Compliance Demonstration

Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(g), NSPS Subpart Dc

Item 3-11.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2--MBST

Item 3-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2009.

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

Condition 3-12: Reporting period

Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(j), NSPS Subpart Dc

Item 3-12.1:

This Condition applies to Emission Unit: 2--MBST

Item 3-12.2: The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th



day following the end of the reporting period



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: Public Access to Recordkeeping for Facilities With State Facility Permits - 6NYCRR Part 201-1.10(a)

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1), and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

Item B: 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 only enforceable.



Condition 2-18: Contaminant List

Effective between the dates of 05/09/2006 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 2-18.1:

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

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

CAS No: 0NY998-00-0
Name: VOC

Condition 2-19: Unavoidable noncompliance and violations

Effective between the dates of 05/09/2006 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-1.4

Item 2-19.1:

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

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

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for



Item 27.1(From Mod 3):

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

Emission Unit: 1-CLEAN

Emission Unit Description:

This emission unit is comprised of those sources of VOC emissions from the paper machine felt cleaning. The sources of emissions are (1) felts.

Building(s): MILL

Item 27.2(From Mod 3):

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

Emission Unit: 1-CMBST

Emission Unit Description:

This emission unit is comprised of the mill's two boilers. The boilers, which are 72 mmbtu/hr and 45 mmbtu/hr in size, are used to generate steam when Boiler #CBN03 is off line. Both boilers are fired on natural gas. Additionally, the stack gases from the boilers have the potential to be directed to the Yankee hood of no 10 paper machine.

Building(s): MILL

Item 27.3(From Mod 3):

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

Emission Unit: 1-PAPER

Emission Unit Description:

This emission unit comprises the paper making processes. The emission sources in this unit are the papermaking machines: PAPR1, PAPR2, PAPR3. One other process in this emission unit is that of supplying supplemental heat to the yankee dryer hoods to sustain the evaporating water in a vapor state. This heat is supplied by (1) natural gas fired hood burners and (2) SCAs boilers.

Building(s): MILL

Item 27.4(From Mod 3):

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

Emission Unit: 2--MBST

Emission Unit Description:

The emission unit is comprised of the natural gas fired boiler #CBN03, which is 95 mmBTU/hr in size, and used to generate steam. The boiler stack gases can be directed to the Yankee hood of the No. 10 Paper Machine.

Building(s): #3 Boiler

Condition 29: Air pollution prohibited

Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2



Item 29.1:

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 3-13: Compliance Demonstration
Effective between the dates of 12/08/2008 and Permit Expiration Date

Applicable State Requirement:6NYCRR 211.2

Item 3-13.1:

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

Emission Unit: 1-CLEAN

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 3-13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Daily usage of solvent for clean-up of the paper machine fabrics is limited to 300 gallons per day per machine.
This cap is to limit voc emissions from causing nuisance odors in the surrounding neighborhood to the facility (as currently permitted).

Process Material: SOLVENT
Parameter Monitored: VOLUME
Upper Permit Limit: 300 gallons per day
Monitoring Frequency: DAILY
Averaging Method: 24 HOUR MAXIMUM
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2009.
Subsequent reports are due every 12 calendar month(s).

Condition 31: Diesel truck opacity limitation
Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable State Requirement:6NYCRR 217-3.2(a)

Item 31.1:

No person who owns, operates or leases a vehicle propelled by a diesel engine or who owns,



leases or occupies land and has actual or apparent dominion or control over the operation of a vehicle propelled by a diesel engine which is present on said land, shall operate said vehicle or allow or permit it to be operated, in such a manner that exhaust emissions of a shade of blue, black, or gray equal to or greater than No. 1 on the Ringelmann chart (20 percent opacity) or equivalent standard acceptable to the commissioner are produced for a continuous period of more than five seconds when the vehicle is in motion.

Condition 32: Idling of diesel trucks limited
Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable State Requirement:6NYCRR 217-3.2(b)

Item 32.1:

No person who owns, operates or leases a bus or truck, the motive power for which is provided by a diesel engine or who owns, leases or occupies land and has the actual or apparent dominion or control over the operation of a bus or truck present on such land, the motive power for which said bus or truck is provided by a diesel engine, shall allow or permit the diesel engine of such bus or truck to idle for more than five consecutive minutes when the bus or truck is not in motion, except as otherwise permitted by 6 NYCRR Subpart 217-3.3.

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

Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 33.1(From Mod 3):

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

Emission Unit: 1-CMBST

Emission Point: 00001

Height (ft.): 72 Diameter (in.): 42
NYTMN (km.): 4795.724 NYTME (km.): 610.332

Emission Point: 00002

Height (ft.): 72 Diameter (in.): 48
NYTMN (km.): 4795.724 NYTME (km.): 610.332

Item 33.2(From Mod 3):

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

Emission Unit: 1-PAPER

Emission Point: P1N01

Height (ft.): 9 Diameter (in.): 10

Emission Point: P1N02

Height (ft.): 9 Length (in.): 42 Width (in.): 32

Emission Point: P1N03



Height (ft.): 31 Diameter (in.): 48

Emission Point: P2N01
Height (ft.): 9 Diameter (in.): 10

Emission Point: P2N03
Height (ft.): 46 Diameter (in.): 36

Emission Point: P2NO2
Height (ft.): 42 Length (in.): 31 Width (in.): 21

Emission Point: P3N01
Height (ft.): 42 Diameter (in.): 30

Emission Point: P3N02
Height (ft.): 54 Length (in.): 42 Width (in.): 32

Condition 34: Process Definition By Emission Unit
Effective between the dates of 02/01/2000 and Permit Expiration Date

Applicable State Requirement:6NYCRR 201-5

Item 34.1(From Mod 3):

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

Emission Unit: 1-CLEAN
Process: CL1 Source Classification Code: 4-90-999-98
Process Description:
This is the process of solvent cleaning the paper machine fabrics. The emission source is the paper machine fabrics.

Emission Source/Control: FELTS - Process

Item 34.2(From Mod 3):

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

Emission Unit: 1-CMBST
Process: C01 Source Classification Code: 1-02-006-02
Process Description: Boilers 1 and 2 natural gas combustion.

Emission Source/Control: CBNO1 - Combustion
Design Capacity: 45 million BTUs per hour

Emission Source/Control: CBNO2 - Combustion
Design Capacity: 72 million BTUs per hour

Item 34.3(From Mod 3):

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

Emission Unit: 1-PAPER
Process: PPR Source Classification Code: 3-07-013-99
Process Description:



This is the process of producing the paper product through the forming and drying of the paper sheet. Emission sources for this process are the three paper machines: PAPR1, PAPR2, and PAPR3.

Emission Source/Control: PAPR1 - Process

Emission Source/Control: PAPR2 - Process

Emission Source/Control: PAPR3 - Process

Item 34.4(From Mod 3):

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

Emission Unit: 2--MBST

Process: C03

Source Classification Code: 1-02-006-02

Process Description: SGF #3 Boiler Natural Gas combustion.

Emission Source/Control: CBN03 - Combustion

Design Capacity: 95 million Btu per hour

New York State Department of Environmental Conservation

Permit ID: 5-4144-00004/00027

Facility DEC ID: 5414400004

