

New York State Department of Environmental Conservation
Facility DEC ID: 5415400003



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
5-4154-00003/00019

Mod 0 Effective Date: 01/22/1999 Expiration Date: No expiration date.

Mod 2 Effective Date: 03/19/2001 Expiration Date: No expiration date.

Permit Issued To: MOHAWK PAPER MILLS INC
465 SARATOGA ST
COHOES, NY 12047-4626

Contact: GEORGE W MILNER
MOHAWK PAPER MILLS
P. O. BOX 497
COHOES, NY 12047
(518) 237-1740

MOHAWK PAPER MILLS
W W T P RD
WATERFORD, NY 12188

Description:

Waterford is a non-integrated paper mill with a maximum capacity of approximately 171 tons per day (TPD) of fine writing and publication papers (Non-integrated mills utilize paper pulp which is either recovered or pulped and bleached offsite). Production is carried out on two paper machines both of which have in line sizing capability. Paper produced is converted (i.e. - cut to size as required and wrapped) and warehoused on site. Production support activities include:

1. Stock preparation;
2. Steam generation;
3. Wastewater treatment; and
4. Miscellaneous support operations including a machine shop and fire suppression system.

Individual emission points associated with "emitting units" are generally located on the attached site drawings. Points whose inventory number is preceded by an "N" have been determined to have the potential to emit regulated air contaminants. Points whose inventory number is preceded by an "E" have been determined to qualify as either exempt or trivial as defined in 6NYCRR Part 201-3.

Steam Generation: (EU P-NYW01)

The mill produces steam on-site for processes, heating, and drying. This is accomplished by two (2), identical 85.3 MMBtu/Hr Babcock and Wilcox boilers ducted to a common stack. Each boiler is



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equipped with a single Cohen model 460 CPF/LN24 burner. The burners are set up to fire either natural gas or No. 2 fuel oil. This emitting unit also includes a 20,000 gallon vertical aboveground storage tank for the No. 2 fuel oil as well as incidental combustion sources.

Generally, this emitting unit is subject to:

1. Specific portions of 6NYCRR Part 200;
2. Specific portions of 6NYCRR Part 201;
3. Specific portions of 6NYCRR Part 227; and
4. Specific portions of 40 CFR Part 60, Subpart Dc;

Paper Production: (EU P-NYW02)

As mentioned above, the mill operates two (2) paper machines both of which were originally built by the Sandy Hill company. Each machine is slightly different dimensionally but is capable of producing the same type(s) of paper. For the purposes of this permit application, the two (2) paper machines have been grouped into a single emitting unit. No other activities have been included.

171 tons per day (TPD) is believed to be the current, combined design capacity for the two (2) paper machines. No significant production capacity increase above this level can be achieved without extensive modifications to the paper machines and supporting mill infrastructure. Further, no significant process changes are presently anticipated such as on or off machine coating operations in addition to the on-going sizing operation. Therefore this emitting unit, as described is believed to be an accurate reflection of the "status quo" at this mill.

Generally, this emitting unit is subject to:

1. Specific portions of 6NYCRR Part 200;
2. Specific portions of 6NYCRR Part 201;
3. 6NYCRR Part 211;
4. Specific portions of 6NYCRR Part 212;

Covering: (EU C-NYW01)

The mill operates an on site covering operation which consists of cutting and wrapping. Converting activities which are not implemented at this mill include, but are not necessarily limited to: off-machine coating; calendering; and printing. This emitting unit is comprised of a single piece of equipment which emits particulate matter to the atmosphere which is a cyclone. This cyclone (QuickDraft/MH-22625) is part of a system which pneumatically conveys paper trim.

Generally, this emitting unit is subject to:

1. Specific portions of 6NYCRR Part 200;
2. Specific portions of 6NYCRR Part 201;
3. 6NYCRR Part 211;
4. Specific portions of 6NYCRR Part 212;

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

General Air Contaminant	Chemical Abstract Number	Regulated By	
		Federal	State
PM-10	NY075-00-5		X
Particulates	NY075-00-0	X	X
Sulfur Dioxide	07446-09-5	X	X
Oxides of Nitrogen	NY210-00-0		X
Carbon Monoxide	00630-08-0	X	
VOCs	NY998-00-0		X
HAPs	NY100-00-0		X
Methane	00074-82-8		X
Acetone	00067-64-1		X
Acetaldehyde	00075-07-0		X
Methyl Ethyl Ketone	00078-93-3		X
Tetrachlorethylene	00127-18-4		X

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

Permit Administrator: WALTER L HAYNES
 DIVISION OF ENVIRONMENTAL PERMITS
 232 HUDSON ST, PO BOX 220
 WARRENSBURG, NY 12885-0220

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

Facility Inspection by the Department

Relationship of this Permit to Other Department Orders and Determinations

Applications for Permit Renewals and Modifications

Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

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



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13(a)

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

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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)

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



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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: MOHAWK PAPER MILLS INC
465 SARATOGA ST
COHOES, NY 12047-4626

Facility: MOHAWK PAPER MILLS
W W T P RD
WATERFORD, NY 12188

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

Mod 0 Permit Effective Date: 01/22/1999



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 16 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 4 6NYCRR 200.7: Maintenance of equipment
- 8 6NYCRR 201-1.7: Recycling and Salvage
- 9 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the Air
- 11 6NYCRR 201-3.2(a): Proof of Eligibility
- 12 6NYCRR 201-3.3(a): Proof of Eligibility
- 14 6NYCRR 202-1.1: Required emissions tests
- 15 6NYCRR 211.3: Visible emissions limited.
- 1 6NYCRR 200.5: Sealing
- 2 6NYCRR 200.6: Acceptable ambient air quality
- 5 6NYCRR 201-1.2: Unpermitted Emission Sources
- 6 6NYCRR 201-1.4: Unavoidable Noncompliance and Violations
- 7 6NYCRR 201-1.5: Emergency Defense
- 10 6NYCRR 201-1.10(a): Public Access to Recordkeeping
- 2-1 6NYCRR 201-6.1(a): Facility Permissible Emissions
- *2-2 6NYCRR 201-6.1(a): Compliance Demonstration
- 17 6NYCRR 225-1.8: Compliance Demonstration
- 19 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Demonstration

Emission Unit Level

- 2-3 6NYCRR 201-6.1(a): Emission Unit Permissible Emissions

EU=C-NYW01

- 2-4 6NYCRR 212.4(c): Compliance Demonstration
- 26 6NYCRR 212.6(a): Compliance Demonstration

EU=P-NYW01

- 2-5 6NYCRR 227-1.3(a): Compliance Demonstration
- 33 40CFR 60.42c(d), NSPS Subpart Dc: Fuel Sulfur Limitation
- 39 40CFR 60.43c(c), NSPS Subpart Dc: Compliance Demonstration
- 34 40CFR 60.43c(d), NSPS Subpart Dc: Enforceability of particulate matter and opacity standards.
- 35 40CFR 60.48c(d), NSPS Subpart Dc: Compliance Demonstration
- 36 40CFR 60.48c(e)(11), NSPS Subpart Dc: Compliance Demonstration
- 37 40CFR 60.48c(f)(1), NSPS Subpart Dc: Compliance Demonstration
- 38 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration

EU=P-NYW02

- 40 6NYCRR 212.3(b): Compliance Demonstration
- 41 6NYCRR 212.6(a): Compliance Demonstration



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 42 6NYCRR 201-5: General Provisions
- 2-6 6NYCRR 201-5: Permit Exclusion Provisions
- 43 6NYCRR 201-5: Emission Unit Definition
- 44 6NYCRR 201-5.3(b): Contaminant List
- 45 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 46 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 47 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping. Permit Expiration Date: No expiration date.

Mod 2 Permit Effective Date: 03/19/2001

Permit Expiration Date: No expiration date.



FEDERALLY ENFORCEABLE CONDITIONS

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

Condition 16: Open Fires Prohibited at Industrial and Commercial Sites
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 215

Item 16.1:

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.

Condition 4: Maintenance of equipment
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.7

Item 4.1:

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 8: Recycling and Salvage
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 8.1:

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

Condition 9: Prohibition of Reintroduction of Collected Contaminants to the Air
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 9.1:

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 11: Proof of Eligibility
Effective between the dates of 01/22/1999 and Permit Expiration Date



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

Item 11.1:

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

Condition 12: Proof of Eligibility

Effective between the dates of 01/22/1999 and Permit Expiration Date

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

Item 12.1:

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.

Condition 14: Required emissions tests

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 14.1:

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.

Condition 15: Visible emissions limited.

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 211.3

Item 15.1:

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-



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minute period per hour of not more than 57 percent opacity.

Condition 1: Sealing
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.5

Item 1.1:

(a) 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 labelling 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.

(b) 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.

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 200.6

Item 2.1:

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 5: Unpermitted Emission Sources
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.2

Item 5.1:

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.

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(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.

Condition 6: Unavoidable Noncompliance and Violations
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.4

Item 6.1:

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 or certificate issued for the corresponding air contamination source. 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.

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

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



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Condition 7: Emergency Defense
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-1.5

Item 7.1:

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.

Condition 10: Public Access to Recordkeeping
Effective between the dates of 01/22/1999 and Permit Expiration Date

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

Item 10.1:

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 2-1: Facility Permissible Emissions



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Effective between the dates of 03/19/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 2-1.1:

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: 0NY210-00-0 (From Mod 2) PTE: 185,345 pounds per year
Name: OXIDES OF NITROGEN

Condition 2-2: Compliance Demonstration

Effective between the dates of 03/19/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Item 2-2.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
Combustion of No. 2 fuel oil at this facility will be limited to 2,675,000 gallons in any 12 month period (annual max, rolled monthly).

This facility fuel limitation will also effectively cap NOx out of Title V applicability and 227-2 (NOx RACT requirements) and SO2 out of Title V applicability.

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: NUMBER 2 OIL
Upper Permit Limit: 2675000 gallons
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.



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The initial report is due 7/30/2001.
Subsequent reports are due every 6 calendar month(s).

Condition 17: Compliance Demonstration
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 225-1.8

Item 17.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Upon request the owner or operator of a facility which purchases and fire coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received/burned, and results of any stack sampling, monitoring, or compliance procedures performed, at the facility. All records shall be available for up to three years.

Monitoring Frequency: DAILY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 01/22/1999 and Permit Expiration Date

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

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

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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 7/30/1999.

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

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

Condition 2-3: Emission Unit Permissible Emissions

Effective between the dates of 03/19/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6.1(a)

Applicaton Specific Data

Condition 2-4: Compliance Demonstration

Effective between the dates of 03/19/2001 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 2-4.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-NYW01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than

0.050 grains of particulates per cubic foot of exhaust

gas, expressed at standard conditions on a dry gas basis.

Compliance testing will be conducted at the discretion of

the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



New York State Department of Environmental Conservation

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration
Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 26.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: C-NYW01

Item 26.2:

Compliance Demonstration shall include the following monitoring:

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 2-5: Compliance Demonstration
Effective between the dates of 03/19/2001 and Permit Expiration Date

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

Item 2-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Item 2-5.2:



New York State Department of Environmental Conservation

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 33: Fuel Sulfur Limitation

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.42c(d), NSPS Subpart Dc

Item 33.1:

This Condition applies to Emission Unit: P-NYW01

Item 33.2:

The permittee shall not fire fuel oil which exceeds 0.50 percent sulfur by weight.

Condition 39: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.43c(c), NSPS Subpart Dc

Item 39.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 39.2:

Compliance Demonstration shall include the following monitoring:

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



New York State Department of Environmental Conservation

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

Monitoring Description:

On and after the date on which the initial performance test is completed or required to be completed under §60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood or oil and has a heat input capacity of 30 million BTU per hour or greater shall cause to be discharged into the atmosphere from an affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Parameter Monitored: OPACITY

Upper Permit Limit: 20.0 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 34: Enforceability of particulate matter and opacity standards.

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.43c(d), NSPS Subpart Dc

Item 34.1:

This Condition applies to Emission Unit: P-NYW01

Item 34.2:

The particulate matter and opacity standards of section 40 CFR 60-Dc.43c apply at all times, except during periods of startup, shutdown, and malfunction.

Condition 35: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

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

Item 35.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 35.2:

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Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit semi-annual reports to the Administrator.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/1999.

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

Condition 36: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.48c(e)(11), NSPS Subpart Dc

Item 36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.43c shall keep records as required under §60.48c(d) including the following information.

If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph §60.48c(f)(1)(2) or (3). In addition to records of fuel supplier certification, the semi-annual report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.



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Facility DEC ID: 5415400003

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 7/30/1999.

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

Condition 37: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.48c(f)(1), NSPS Subpart Dc

Item 37.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 37.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuel supplier certification shall include the following
information for distillate oil:

- i) The name of the oil supplier, and
- ii) A statement from the oil supplier that the oil
complies with the specifications under the definition of
distillate oil in §60.41c. 60-Dc 41c defines distillate
oil as fuel that complies with the specifications for fuel
oil numbers 1 or 2, as defined by the American Society for
Testing and Materials in ASTM D396-78, A standard
Specification for Fuel Oils.

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 7/30/1999.

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

Condition 38: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

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Facility DEC ID: 5415400003



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

Item 38.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Item 38.2:

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: UPON REQUEST BY REGULATORY AGENCY

**Condition 40: Compliance Demonstration
Effective between the dates of 01/22/1999 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 40.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW02

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 40.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.150 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5



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Facility DEC ID: 5415400003

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 41: Compliance Demonstration

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW02

Item 41.2:

Compliance Demonstration shall include the following monitoring:

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

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STATE ONLY ENFORCEABLE CONDITIONS

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

Condition 42: General Provisions

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 42.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 42.2:

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.

Item 42.3:

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.

Condition 2-6: Permit Exclusion Provisions

Effective between the dates of 03/19/2001 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 2-6.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supersede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements



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contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 43: Emission Unit Definition

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 43.1(From Mod 2):

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

Emission Unit: C-NYW01

Emission Unit Description:

CONVERTING: THE PAPER PRODUCED AT THE MILL IS PROCESSED THROUGH THE CONVERTING. ROLLS FROM THE PAPER MACHINES ARE EITHER WRAPPED WHOLE OR CUT TO SIZE AND PACKAGED FOR SHIPMENT TO END USERS. THE CUTTING OPERATION CONSISTS OF A SLITTER WHICH BOTH REDUCES THE ROLL STOCK TO INDIVIDUAL SHEETS OF THE PROPER LENGTH AND WIDTH AND ALSO REMOVES THE TWO OUTSIDE EDGES OF THE ROLL. THE TWO OUTSIDE EDGES ARE REFERRED TO AS TRIM. THE TRIM IS PNEUMATICALLY CONVEYED TO A CHOPPER. THE VACUUM IN THE PNEUMATIC SYSTEM IS CREATED BY A CYCLONE WHICH ALSO SERVES TO CONTROL EMISSIONS FROM THE TRIMMING AND CHOPPING OPERATIONS. TRIM IS CONVEYED TO THE STOCK PREPARATION AREA WHERE IT IS REPULPED. THE PACKAGING OPERATION (I.E. - FOR BOTH ROLL STOCK AND REAMS) USES A SMALL AMOUNT OF ADHESIVES TO SEAL EACH WRAPPER. ANY REGULATED AIR CONTAMINANTS FROM THESE ADHESIVES ARE FUGITIVE TO THE CONVERTING AREA ROOM AND ARE NOT, THEREFORE, EXHAUSTED THROUGH A DISCRETE EMISSION POINT TO THE ATMOSPHERE.

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THIS UNIT HAS ONE DISCRETE EMISSION POINT (CVN-01) ASSOCIATED WITH THE CUTTING OPERATION. A PROCESS FLOW DIAGRAM INCLUDED AS SK-III-2.

Building(s): CV-01

Item 43.2(From Mod 2):

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

Emission Unit: P-NYW01

Emission Unit Description:

FOR THE PURPOSE OF THIS PERMIT APPLICATION, THIS EMITTING UNIT HAS BEEN DEFINED AS THE BOILER HOUSE AND ANCILLARY INSTALLATIONS INCLUDING, BUT NOT LIMITED TO THE NO. 2 FUEL OIL ABOVE GROUND STORAGE TANK (AST). THE BOILER HOUSE, WHICH WAS STARTED UP IN 1997 (SEE NOTE 1) REPLACING THREE, OLDER COMBUSTION UNITS, GENERATES STEAM FOR MILL OPERATIONS AND HEATING. MILL PROCESSES WHICH USE STEAM PRODUCED ON-SITE INCLUDE: 1) REPULPING IN THE STOCK PREPARATION AREA; 2) THE DRYER CANS ON IN THE MAIN AND AFTER DRYER SECTION OF THE PAPER MACHINES; AND 3) FACILITY HEATING REQUIREMENTS IN SELECTED LOCATIONS. THE REPLACEMENT ALSO ENABLED THE MILL TO COMPLY WITH 6NYCRR PART 227-2 (I.E. - NO_x RACT). ADDITIONALLY, A SEPARATE, NEW STACK WAS ERECTED AS PART OF THE BOILER HOUSE CONSTRUCTION PROJECT WHICH REPLACED THREE STACKS ASSOCIATED WITH THE OLD BOILERS. THE RETIREMENT OF THESE THREE EMISSION POINTS ENABLED MOHAWK PAPER MILLS, INC. TO CREATE EMISSION REDUCTION CREDITS (ERCS) FOR BOTH NO_x AND VOCs IN ACCORDANCE WITH 6 NYCRR PART 231. THE NEW BOILER HOUSE CONTAINS TWO BABCOCK & WILCOX PACKAGE BOILERS EACH WITH A DESIGN HEAT INPUT OF 85.3 MMBTU/HR. EACH BOILER UTILIZES A SINGLE COHEN MODEL 460 CPF/LN 24 LOW NO_x BURNER FIRED PRIMARILY ON NATURAL GAS. NO. 2 FUEL OIL IS USED AS A BACK-UP FUEL AND IS STORED ON SITE IN A 20,000 GALLON NO. 2 FUEL OIL AST. A PROCESS FLOW DIAGRAM IS INCLUDED AS SK-III-3. MOHAWK PAPER MILLS, INC. HAS REQUESTED AND RECEIVED FEDERALLY

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ENFORCEABLE OPERATING CONDITIONS WHICH LIMIT THE BOILER HOUSE'S POTENTIAL-TO-EMIT (PTE) BELOW THE TITLE V APPLICABILITY THRESHOLDS AS DELINEATED IN 6NYCRR PART 201-6. THE ESSENCE OF THESE OPERATING CONDITIONS (SEE NOTE 2) REQUIRE THE BOILER HOUSE TO MAINTAIN RECORDS AND PERFORM REPORTING TO DEMONSTRATE THAT FOR ANY CONSECUTIVE TWELVE-MONTH PERIOD. 1) NO MORE THAN 11,182,500 THERMS OF NATURAL GAS MAY BE COMBUSTED, AND 2) NO MORE THAN 2,675,000 GALLONS OF NO. 2 FUEL (I.E. - WITH A SULFUR CONTENT LESS THAN OR EQUAL TO 0.5%) CAN BE COMBUSTED). THESE FEDERALLY ENFORCEABLE CONDITIONS ARE, AS OF THE DATE OF THIS FACILITY WIDE PERMIT APPLICATION, BELIEVED TO BE SUFFICIENT TO ADDRESS BOTH THE DEGREE OF OPERATIONAL FLEXIBILITY AND ALTERNATE OPERATING SCENARIOS NECESSARY TO ACCOMMODATE PRODUCTION AT THE MILL. THEREFORE THE EMISSIONS ESTIMATES, HAS DELINEATED HEREIN, ARE BELIEVED TO BE REPRESENTATIVE OF THE STATUS QUO FOR THIS EMITTING UNIT FOR SOME TIME TO COME. (NOTE 1) A REQUEST FOR MODIFICATIONS, WHICH INCLUDED FEDERALLY ENFORCEABLE OPERATING CONDITIONS, TO THE ORIGINAL PERMIT ASSOCIATED WITH THIS EMISSION POINT (DESIGNATED AS EP-00005) WAS PREVIOUSLY SUBMITTED TO AND APPROVED BY REGION 5 AIR POLLUTION CONTROL ENGINEER OCTOBER, 1997 AND FEBRUARY, 1998, RESPECTIVELY. (NOTE 2) THE "SPECIAL CONDITIONS" (ATTACHED TO THIS PERMIT APPLICATION) WHICH LIMIT THE BOILER HOUSE'S PTE WERE FORMALLY INCORPORATED IN THE OPERATING PERMIT BY THE NYSDEC REGION 5 DEPUTY REGIONAL PERMIT ADMINISTRATOR ON APRIL 28, 1998.

Building(s): BH-01

Item 43.3(From Mod 0):

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

Emission Unit: P-NYW02

Emission Unit Description:

THE PAPER MACHINES AT THE WATERFORD MILL
PRODUCE FINE WRITING AND PUBLICATION

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Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003



PAPERS. THESE PAPERS ARE PRODUCED FROM KRAFT (CHEMICAL) AND POST CONSUMER MARKET PULPS BOTH OF WHICH ARE PURCHASED FROM OFF-SITE MANUFACTURERS. THE PAPER MACHINES EACH HAVE FOUR DISTINCT SECTIONS: 1) THE WET END (FORMING SECTION), 2) A SET OF DRYERS (MAIN DRYING SECTION), 3) ON MACHINE SIZING APPLICATION (SIZING SECTION), AND 4) A SET OF AFTER DRYERS (SECONDARY DRYING SECTION). THE SIZE PRESSES ON EACH MACHINE SEPARATE THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES. THE PRESS IS ACTUALLY A SET OF ROLLERS WHICH APPLIES A MIXTURE OF STARCH AND CLAY TO THE PAPER WEB TO ENHANCE ITS PRINTABILITY. THE EMISSION POINTS ASSOCIATED WITH THESE MACHINES HAVE BEEN COMBINED INTO A SINGLE EMITTING UNIT BECAUSE: 1) BOTH MACHINES PRODUCE CHEMICALLY AND PHYSICALLY SIMILAR PAPER(S); AND 2) THE WET END SECTIONS OF BOTH MACHINES SHARE A COMMON EMISSION POINT. ESTIMATES OF EMISSIONS: EMISSIONS FOR THE VARIOUS PROCESSES (F01, D01, & D02) ASSOCIATED WITH THIS EMITTING UNIT WERE ESTIMATED USING EMISSION FACTORS DEVELOPED BY THE NATIONAL COUNCIL ON AIR AND STREAM IMPROVEMENT (NCASI). SPECIFICALLY, EMISSION FACTORS WERE TAKEN FROM: NCASI TECHNICAL BULLETIN NO. 681 (10/94 ED.) PART VII - "PULP DRYERS AND PAPER MACHINES AT INTEGRATED CHEMICAL PULP MILLS," SECTION C - "MILL K PROCESS DESCRIPTION AND TEST PROGRAM." THE TESTING IMPLEMENTED BY NCASI WAS FOR EMISSIONS OF SELECTED HAPS AND OTHER AIR CONTAMINANTS AT SPECIFIC MILL SITES WHICH VOLUNTEERED INTO THE PROGRAM. MILL "K" IS DESCRIBED AS "...PRODUCING COATED FREESHEET PUBLICATION PAPERS...USING A COMBINATION OF SOFTWOOD AND HARDWOOD PULPS..." MILL "K's" PAPERMAKING PROCESS IS THEREFORE VERY SIMILAR TO PAPERMAKING OPERATIONS AT MOHAWK'S WATERFORD MILL. NO ADDITIONAL STUDIES HAVE BEEN CONDUCTED BY NCASI SINCE OCTOBER, 1994.

Building(s): PMB01



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Condition 44: Contaminant List

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5.3(b)

Item 44.1:

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

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

Condition 45: Air pollution prohibited

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 211.2

Item 45.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 46: Emission Point Definition By Emission Unit

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 46.1(From Mod 0):

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

Emission Unit: C-NYW01

Emission Point: CVN01

Height (ft.): 31

Diameter (in.): 58



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Building: CV-01

Item 46.2(From Mod 0):

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

Emission Unit: P-NYW01

Emission Point: CBN01

Height (ft.): 110

Diameter (in.): 72

Building: BH-01

Item 46.3(From Mod 0):

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

Emission Unit: P-NYW02

Emission Point: PMN01

Height (ft.): 4

Diameter (in.): 48

Building: PMB01

Emission Point: PMN02

Height (ft.): 55

Diameter (in.): 60

Building: PMB01

Emission Point: PMN03

Height (ft.): 55

Diameter (in.): 60

Building: PMB01

Condition 47: Process Definition By Emission Unit

Effective between the dates of 01/22/1999 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-5

Item 47.1(From Mod 2):

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

Emission Unit: C-NYW01

Process: V01

Source Classification Code: 3-07-008-05

Process Description:

TRIMMING: THIS OPERATION CONSISTS OF ONE MACHINE THAT CONVERTS LARGE ROLLS FROM THE PAPER MACHINES TO REAMS. EACH REAM IS TYPICALLY TO 25"x38" AND CONTAINS 500 SHEETS, WEIGHING 50 TO 90 POUNDS. EACH REAM IS INDIVIDUALLY WRAPPED AND SEALED WITH AN ADHESIVE MATERIAL. AIR CONTAMINANTS FROM THE ADHESIVES ARE

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FUGITIVE TO THE ROOM. A VACUUM SYSTEM UTILIZING A CYCLONE IS USED TO COLLECT THE TRIM MATERIAL AND PARTICULATE MATTER (I.E. - PAPER DUST) FROM THIS OPERATION. THE TRIM IS CHOPPED AND, WITH THE PAPER DUST, CONVEYED BACK TO THE STOCK PREPARATION AREA WHERE IT IS REPULPED. THE CYCLONE SYSTEM'S AIR IS EXHAUSTED THROUGH A DISCRETE EMISSION POINT (CVN-01) TO THE ATMOSPHERE (SEE NOTE 1). THE CYCLONE MANUFACTURER INDICATED THAT 99.9% OF THE TRIM MATERIAL (AND ASSOCIATED PAPER DUST) ARE CAPTURED FROM THE TRIMMING OPERATION. THEREFORE, FOR THE PURPOSES OF ESTIMATING EMISSIONS FROM THIS PROCESS, IT HAS BEEN ASSUMED THAT 0.01% OF THE MATERIAL TRIMMED IS EMITTED.

Emission Source/Control: CYCL1 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: PTRIM - Process

Item 47.2(From Mod 2):

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

Emission Unit: P-NYW01

Process: C01

Source Classification Code: 1-02-006-01

Process Description:

THIS "PROCESS" COMBUSTS NATURAL GAS TO PRODUCE STEAM WHICH IS USED IN THE PAPERMAKING PROCESS.

Emission Source/Control: BLR01 - Combustion

Design Capacity: 85.3 million Btu per hour

Emission Source/Control: BLR02 - Combustion

Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB01 - Control

Control Type: LOW NOx BURNER

Emission Source/Control: LNB02 - Control

Control Type: LOW NOx BURNER

Item 47.3(From Mod 2):

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



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Emission Unit: P-NYW01

Process: C02

Source Classification Code: 1-02-005-02

Process Description:

THIS "PROCESS" IS CAPABLE OF COMBUSTING NO. 2 FUEL OIL AS A BACK-UP FUEL IN THE EVENT OF AN INTERRUPTION IN THE SUPPLY OF NATURAL GAS TO PRODUCE STEAM WHICH IS USED IN THE PAPERMAKING PROCESS.

Emission Source/Control: BLR01 - Combustion

Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB01 - Control

Control Type: LOW NOx BURNER

Item 47.4(From Mod 2):

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

Emission Unit: P-NYW01

Process: C03

Source Classification Code: 1-02-005-02

Process Description:

THIS "PROCESS" IS CAPABLE OF COMBUSTING NO. 2 FUEL OIL AS A BACK-UP FUEL IN THE EVENT OF AN INTERRUPTION IN THE SUPPLY OF NATURAL GAS TO PRODUCE STEAM WHICH IS USED IN THE PAPERMAKING PROCESS.

Emission Source/Control: BLR02 - Combustion

Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB02 - Control

Control Type: LOW NOx BURNER

Item 47.5(From Mod 0):

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

Emission Unit: P-NYW02

Process: D01

Source Classification Code: 3-07-004-06

Process Description:

MAIN SECTION DRYERS (SEE NOTE 1) AND AFTER SECTION DRYERS (NO. 1 PAPER MACHINE): IN THE MAIN SECTION DRYERS OF THE NO. 1 PAPER MACHINE THE PAPER WEB COMES IN DIRECT CONTACT WITH A LARGE NUMBER OF STEAM HEATED, STEEL CYLINDERS KNOWN AS DRYER CANS. AS THE PAPER WEB PASSES THROUGH THE DRYER SECTION, HEAT ENERGY FROM THE DRYER

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CANS IS TRANSFERRED TO THE WATER IN THE PAPER WEB. THE WATER IS HEATED AND FLASHED OFF FROM THE PAPER WEB AND EXHAUSTED THROUGH A SINGLE, DISCRETE EMISSION POINT (P-MN02). AS PREVIOUSLY MENTIONED, THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES ARE SEPARATED BY A SIZE PRESS. SIZING SOLUTION IS APPLIED WITH A SET OF ROLLERS AND PRIMARILY PROVIDES THE PAPER SHEET WITH RESISTENCE TO PENETRATION BY AQUEOUS SOLUTIONS (I.E. - INKS, ET C.). IT CAN ALSO PROVIDE BETTER PHYSICAL PROPERTIES AND IMPROVE CERTAIN SURFACE CHARACTERISTICS WHICH EFFECT PRINTABILITY. THE SIZING SOLUTIONS USED AT THE WATERFORD MILL ARE PRIMARILY AQUEOUS MIXTURES OF STARCH, CLAY, AND TITANIUM DIOXIDE (I.E. - TO EN HANCE BRIGHTNESS) ALL OF WHICH CONTAIN NO VOLATILE ORGANIC COMPOUNDS. THE SIZING SOLUTION ACTS BOTH TO FILL VOIDS IN AND SEAL THE PAPER SHEET SURFACE. SUBSEQUENT TO APPLICATION OF THE SIZING SOLUTION BY THE PRESS ROLLERS, THE PAPER WEB TRAVELS THROUGH THROUGH THE AFTER SECTION DRYERS. HERE THE WEB COMES IN DIRECT CONTACT WITH A SECOND SET OF DRYER CANS WHERE HEAT ENERGY IS USED TO FLASH OFF WATER CONTAINED IN THE PREVIOUSLY APPLIED SIZING SOLUTION. THESE EMISSIONS ARE EXHAUSTED THROUGH THE SAME POINT AS THE EMISSIONS FROM THE MAIN SECTION DRYERS ON THIS MACHINE (P-MN02). THE DRYING OF THE SIZED WEB IS BELIEVED NOT TO CONTRIBUTE VOCS OR OTHER REGULATED AIR CONTAMINANTS TO THIS EMISSION POINT BECAUSE: 1) THE SIZING SOLUTION IS AQUEOUS BASED AND CONTAINS NO ORGANIC COMPONENTS (EXCEPT FOR VARYING AMOUNT OF STARCH DEPENDING ON THE COATING FORMULATION; AND 2) THE SIZING SOLUTION SEALS THE WEB MITIGATING ANY FURTHER RELEASE OF VOCS FROM THE PAPER. (NOTE 1) THE MAIN AND AFTER SECTION DRYERS ARE SEPARATED BY A SIZE PRESS.

Emission Source/Control: DSPM1 - Process

Design Capacity: 43,800 tons per year

New York State Department of Environmental Conservation

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003



Item 47.6(From Mod 0):

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

Emission Unit: P-NYW02

Process: D02

Source Classification Code: 3-07-004-06

Process Description:

MAIN SECTION DRYERS (SEE NOTE 1) AND AFTER SECTION DRYERS (NO. 2 PAPER MACHINE): IN THE MAIN SECTION DRYERS OF THE NO. 2 PAPER MACHINE THE PAPER WEB COMES IN DIRECT CONTACT WITH A SECTION DRYER CANS. AS THE PAPER WEB PASSES THROUGH THIS SECTION OF THE MACHINE, HEAT ENERGY IS TRANSFERRED TO WATER IN THE PAPER WEB. THE WATER IS HEATED AND FLASHED OFF AND EXHAUSTED THROUGH A SINGLE, DISCRETE EMISSION PONT (PMN-03) FOR THIS SECTION OF DRYERS. THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES ARE SEPARATED BY A SIZE PRESS. SIZING SOLUTION IS APPLIED WITH A SET OF ROLLERS AND PRIMARILY PROVIDES THE PAPER SHEET WITH RESISTANCE TO PENETRATION BY AQUEOUS SOLUTIONS (I.E. - INKS, ETC.). IT CAN ALSO PROVIDE BETTER PHYSICAL PROPERTIES AND IMPROVE CERTAIN SURFACE CHARACTERISTICS WHICH EFFECT PRINTABILITY. THE SIZING SOLUTIONS USED AT THE WATERFORD MILL ARE PRIMARILY AQUEOUS MIXTURES OF STARCH, CLAY, AND TITANIUM DIOXIDE (I.E. - TO ENHANCE BRIGHTNESS) ALL OF WHICH CONTAIN NO VOLATILE ORGANIC COMPOUNDS. THE SIZING SOLUTION ACTS BOTH TO FILL VOIDS IN AND SEAL THE PAPER SHEET SURFACE. SUBSEQUENT TO APPLICATION OF THE SIZING SOLUTION BY THE PRESS ROLLERS, THE PAPER WEB TRAVELS THROUGH THE AFTER SECTION DRYERS. HERE THE WEB COMES IN DIRECT CONTACT WITH A SECOND SET OF DRYER CANS WHERE HEAT ENERGY IS USED TO FLASH OFF WATER CONTAINED IN THE PREVIOUSLY APPLIED SIZING SOLUTION. THESE EMISSIONS ARE EXHAUSTED THROUGH A DISCRETE POINT ON THIS MACHINE (PME12). THE DRYING OF THE SIZED WEB IS BELIEVED NOT TO CONTRIBUTE TO VOCs OR OTHER REGULATED AIR CONTAMINANTS TO THIS EMISSION POINT BECAUSE: 1) THE SIZING SOLUTION IS AQUEOUS BASED AND CONTAINS NO ORGANIC COMPONENTS

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(EXCEPT FOR VARYING AMOUNTS OF STARCH DEPENDING ON THE COATING FORMULATION; AND 2) THE SIZING SOLUTION SEALS THE WEB MITIGATING ANY FURTHER RELEASE OF VOCS FROM THE PAPER. (NOTE 1) THE MAIN AND AFTER SECTION DRYERS ARE SEPARATED BY A SIZE PRESS.

Emission Source/Control: DSPM2 - Process

Design Capacity: 10,020 tons per year

Item 47.7(From Mod 0):

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

Emission Unit: P-NYW02

Process: F01

Source Classification Code: 3-07-004-06

Process Description:

WET END (FORMING SECTION) (BOTH MACHINES):
THE WET END OF A PAPER MACHINE IS WHERE THE PAPER WEB IS INITIALLY FORMED. THIS PORTION OF THE PAPER MACHINE USES GRAVITY AND MECHANICAL ENERGY TO PERFORM THE INITIAL WATER REMOVAL FROM THE PAPER WEB. THE WEB IS INITIALLY FORMED FROM "WHITE WATER" WHICH IS A SOLUTION OF PAPER FIBER AND WATER. THIS SOLUTION, AT ITS POINT OF APPLICATION ON THE PAPER MACHINE, IS APPROXIMATELY 99.5 PERCENT WATER (I.E. 0.5% CONSISTENCY). THE WET ENDS OF THE PAPER MACHINES HAVE ONE, COMMON DISCRETE EMISSION POINT (PMN-01) WHICH IS THE EXHAUST FOR THE VACUUM ROLLS ON BOTH MACHINES.

Emission Source/Control: 0WEPM - Process

Design Capacity: 62,415 tons per year