



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-5205-00005/00059
Effective Date: 01/09/2012 Expiration Date: 01/08/2017

Permit Issued To: FINCH PAPER LLC
1 GLEN ST
GLENS FALLS, NY 12801

Contact: SANDRA L LEBARRON
FINCH PAPER LLC
1 GLEN ST
GLENS FALLS, NY 12801
(518) 793-2541

Facility: FINCH PAPER LLC
1 GLEN ST
GLENS FALLS, NY 12801

Description:
Finch paper is a fully integrated pulp and paper manufacturer. The facility processes hardwood and softwood pulp log and chip raw materials using the Sulfite process. Converted pulp is washed, bleached and prepared for finishing by paper machines. A number of supporting processes are required to produce the pulp and paper. Boilers produce steam for generating electricity as well as providing process and comfort heat. A recovery boiler system recovers chemicals from the pulping process and prepares them for reuse. Finally, a treatment plant collects and processes the wastewater.

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: MARC S MIGLIORE
NYSDEC
232 GOLF COURSE RD
WARRENSBURG, NY 12885

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



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

Item 4.1:

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

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

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

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

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 5 Sub-office
Division of Environmental Permits
232 Golf Course Road
Warrensburg, NY 12885-1172
(518) 623-1281

New York State Department of Environmental Conservation

Permit ID: 5-5205-00005/00059

Facility DEC ID: 5520500005



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: FINCH PAPER LLC
1 GLEN ST
GLENS FALLS, NY 12801

Facility: FINCH PAPER LLC
1 GLEN ST
GLENS FALLS, NY 12801

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

Permit Effective Date: 01/09/2012

Permit Expiration Date: 01/08/2017



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
 - 2 6 NYCRR 201-6.5 (a) (7): Fees
 - 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
 - 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
 - 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
 - 6 6 NYCRR 201-6.5 (e): Compliance Certification
 - 7 6 NYCRR 202-2.1: Compliance Certification
 - 8 6 NYCRR 202-2.5: Recordkeeping requirements
 - 9 6 NYCRR 215.2: Open Fires - Prohibitions
 - 10 6 NYCRR 200.7: Maintenance of Equipment
 - 11 6 NYCRR 201-1.7: Recycling and Salvage
 - 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
 - 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
 - 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
 - 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
 - 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
 - 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
 - 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
 - 19 6 NYCRR 202-1.1: Required Emissions Tests
 - 20 40 CFR Part 68: Accidental release provisions.
 - 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
 - 22 6 NYCRR Subpart 201-6: Emission Unit Definition
 - 23 6 NYCRR 201-6.5 (g): Non Applicable requirements
 - 24 6 NYCRR 211.1: Air pollution prohibited
 - 25 6 NYCRR 225-1.2 (d): Compliance Certification
 - 26 6 NYCRR 227-1.3 (a): Compliance Certification
 - 27 40CFR 63.10, Subpart A: § 63.10(b) General Recordkeeping Requirements
 - 28 40CFR 63.10, Subpart A: §63.10(d) General Reporting Requirements
 - 29 40CFR 63.10, Subpart A: Compliance Certification
 - 30 40CFR 63.864(k), Subpart MM: Compliance Certification
- #### Emission Unit Level
- 31 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
 - 32 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=3-00000

- 33 6 NYCRR 227-1.3 (a): Compliance Certification
- 34 6 NYCRR 227-1.4 (b): Compliance Certification

EU=3-00000,Proc=311

- 35 6 NYCRR Subpart 227-1: Compliance Certification

EU=3-00000,EP=00009



36 6 NYCRR 227-1.2 (a) (1): Compliance Certification

EU=3-10000

37 6 NYCRR 227-1.5: Multiple fuels particulate matter emission rate.

EU=3-10000,EP=00011

38 6 NYCRR 227-1.2 (a) (4): Compliance Certification

39 6 NYCRR 227-1.2 (a) (4): Compliance Certification

40 6 NYCRR 227-1.3 (a): Compliance Certification

EU=3-20000

41 6 NYCRR 212.6 (a): Compliance Certification

42 6 NYCRR 212.10 (c) (3): Compliance Certification

43 40CFR 63, Subpart MM: Compliance Certification

EU=3-20000,EP=00012

44 6 NYCRR 212.4 (c): Compliance Certification

EU=4-00000

45 40CFR 63.444(c)(2)(i), Subpart S: Compliance Certification

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

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

48 40CFR 63.454(b), Subpart S: Compliance Certification

EU=4-00000,Proc=401,ES=00402

49 6 NYCRR 212.4 (a): Compliance Certification

50 6 NYCRR 212.4 (a): Compliance Certification

EU=4-00000,Proc=405

51 40CFR 63.445(b), Subpart S: Bleaching Systems - Closed-vent System and Control Device Requirements

EU=4-00000,Proc=405,ES=00437

52 40CFR 63.445(c)(2), Subpart S: Compliance Certification

53 40CFR 63.445(c)(2), Subpart S: Compliance Certification

54 40CFR 63.445(c)(2), Subpart S: Compliance Certification

55 40CFR 63.453(o), Subpart S: Compliance Certification

EU=4-00000,Proc=407,ES=00446

56 6 NYCRR 212.4 (a): Compliance Certification

57 6 NYCRR 212.4 (a): Compliance Certification

EU=8-00000,Proc=801

58 6 NYCRR 229.3 (e) (2) (iv): Compliance Certification

EU=8-00000,Proc=802

59 6 NYCRR 229.3 (e) (2) (v): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS
Facility Level

New York State Department of Environmental Conservation

Permit ID: 5-5205-00005/00059

Facility DEC ID: 5520500005



- 60 ECL 19-0301: Contaminant List
- 61 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 62 6 NYCRR 211.2: Visible Emissions Limited
- 63 6 NYCRR 212.6 (a): Compliance Demonstration

Emission Unit Level

EU=2-00000

- 64 6 NYCRR 212.4 (c): Compliance Demonstration

EU=3-00000

- 65 6 NYCRR 227-1.4 (a): Compliance Demonstration
- 66 6 NYCRR 227-2.3 (c): Compliance Demonstration
- 67 6 NYCRR 227-2.5 (c): Compliance Demonstration
- 68 6 NYCRR 227-2.5 (c): Compliance Demonstration
- 69 6 NYCRR 227-2.5 (c): Compliance Demonstration

EU=3-10000

- 70 6 NYCRR 227-2.6 (a): Compliance Demonstration

EU=3-20000,EP=00012

- 71 6 NYCRR 212.4 (a): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10 (b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.3 (a) (4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR 201-6.3 (d) (12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR 201-6.5 (a) (2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.5 (a) (3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.5 (a) (5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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



Item I: Severability - 6 NYCRR 201-6.5 (a) (9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR 201-6.5 (g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: **Federally Enforceable Requirements - 40 CFR 70.6 (b)**
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

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

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

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Condition 2: Fees
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 2.1:
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 3.1:



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

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

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

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

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 4.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

Condition 5: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum



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

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

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.
- (4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

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

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



Condition 6: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

New York State Department of Environmental Conservation

Permit ID: 5-5205-00005/00059

Facility DEC ID: 5520500005



iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

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

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2012.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 202-2.1

Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY



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

Condition 8: Recordkeeping requirements
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

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

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

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

Condition 9: Open Fires - Prohibitions
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

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

Item 9.2

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

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



- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to



the air

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 13.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 14: Trivial Sources - Proof of Eligibility

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 14.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other State and Federal air pollution control requirements, regulations, or law.

Condition 15: Standard Requirement - Provide Information

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 15.1:

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



administrator initiated the request for information or otherwise has need of it.

Condition 16: General Condition - Right to Inspect
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 16.1:

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 17.1:

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

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

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

Condition 18: Off Permit Changes
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of



Condition 21: Recycling and Emissions Reduction
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:40CFR 82, Subpart F

Item 21.1:

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

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

Condition 22: Emission Unit Definition
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 22.1:

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

Emission Unit: 1-00000

Emission Unit Description:

Unit consists of four paper machines and their associated emission points. Sulfite stock is mixed with additives on the wet end and processed through the paper machines to form paper product. Emissions are released through the exhausters, economizers, and hood exhaust fans of the paper machines

Building(s): PM123
PM4

Item 22.2:

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

Emission Unit: 2-00000

Emission Unit Description:

The unit consists of the facility's pulp prep and precipitated calcium carbonate processes.

Building(s): PCC

Item 22.3:

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

Emission Unit: 3-00000

Emission Unit Description:

Emission unit 3-00000 consists of facility's power boiler network. Unit contains five power boilers which can burn either natural gas or #6 fuel oil. When burning fuel oil, the power boilers exhaust through a common stack (EP00009). Each of the power boilers has an individual



short stack when using natural gas. Also included are recovery boilers 6 & 7 when they are burning oil and exhausting through EP00009.

Building(s): POWER

Item 22.4:

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

Emission Unit: 3-10000

Emission Unit Description:

Emission unit 3-10000 consists of the facility's woodwaste boiler. Wood waste is combusted with #6 fuel oil or natural gas. A dust collector and venturi scrubber are used to control particulate emissions.

Building(s): POWER

Item 22.5:

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

Emission Unit: 3-20000

Emission Unit Description:

Emission unit 3-20000 consists of the facility's recovery boiler network. The unit contains four boilers which can burn #6 fuel oil or natural gas in order to combust product liquor. The SO₂ from the liquor combustion is collected for use as acid for digestion through ammonia towers. Brinks mist eliminators are used to control particulate emissions.

Building(s): POWER

Item 22.6:

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

Emission Unit: 4-00000

Emission Unit Description:

Emission unit consists of the pulp mill and bleach plant.

Building(s): PULP

Item 22.7:

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

Emission Unit: 5-00000

Emission Unit Description:

Emission unit 5-00000 is the facility's wastewater treatment unit. The unit consists of the wastewater collection system and the wastewater treatment system. The wastewater collection system consists of 5 pump or lifts stations for various areas of the facility. The wastewater treatment system consists of the following emission points: two mix tank vents, three primary clarifiers, two aeration basins, three secondary clarifiers, two gravity thickeners, a dewatering basin,



and three belt filter presses.

Building(s): MISC
WWT

Item 22.8:

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

Emission Unit: 6-00000

Emission Unit Description:

This emission unit consists of the wood chipping, debarking, and wood chip storage piles.

Building(s): WOOD

Item 22.9:

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

Emission Unit: 7-00000

Emission Unit Description:

This emission unit consists of miscellaneous plant support operations including paper trim baling and a babbitt pot for wood chipper maintenance.

Building(s): MISC

Item 22.10:

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

Emission Unit: 8-00000

Emission Unit Description:

Emission unit 800000 contains the facility's miscellaneous storage vessels. The tanks are located at various places in the facility.

Building(s): CHEM
MISC

Condition 23: Non Applicable requirements

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 23.1:

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

6 NYCRR 212.10 (c) (1)

Emission Unit: 100000

Reason: Paper machines are not subject to VOC RACT because no emission point has an emission rate potential of 3 pounds per hour or more.



Condition 24: Air pollution prohibited
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 211.1

Item 24.1:

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

Condition 25: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 25.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 6 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 26: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017



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

Item 26.1:

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

Emission Unit: 3-10000

Emission Unit: 3-20000
Process: 306

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (6 minute average), except for one period per hour of not more than 27 percent opacity. Daily visible emissions observations will be made when the fuel used is oil or wood.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

**Condition 27: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 01/09/2012 and 01/08/2017**

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 27.1:

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

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retained on site. The owner or operator of an affected source subject to the provisions of this part

shall maintain relevant records for such source as described in 40 CFR 63.10

(b)(2).

Condition 28: §63.10(d) General Reporting Requirements
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 28.1:

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

Condition 29: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:40CFR 63.10, Subpart A

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A summary report shall be submitted for the hazardous air pollutants monitored at each affected source. The summary report shall be entitled "Summary Report-Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and contain the information specified in 40CFR63.10(e)(3)(vi) . A combined report may be submitted for Subpart S and Subpart MM requirements.

If the total duration of excess emissions or control system parameter exceedences for the reporting period is 1 % or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5% or greater of the total operating time for the reporting period, both this summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 30: Compliance Certification

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Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 30.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 3-20000

Process: 308

Emission Source: 00316

Emission Unit: 3-20000

Process: 308

Emission Source: 00317

Emission Unit: 3-20000

Process: 308

Emission Source: 00318

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 30.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Pressure drop across the mist eliminators shall not be less than 6 inches of water. Facility will be in violation if six or more 3-hour block average readings during any 6-month reporting period are below 6 inches.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 6 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

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

Condition 31: Emission Point Definition By Emission Unit

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 31.1:

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



Emission Unit: 1-00000

Emission Point: 10009
Height (ft.): 54 Length (in.): 41 Width (in.): 62
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10010
Height (ft.): 54 Length (in.): 41 Width (in.): 62
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10011
Height (ft.): 54 Length (in.): 41 Width (in.): 62
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10012
Height (ft.): 30 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10017
Height (ft.): 54 Length (in.): 39 Width (in.): 52
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10018
Height (ft.): 30 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10019
Height (ft.): 54 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10020
Height (ft.): 54 Length (in.): 39 Width (in.): 52
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10021
Height (ft.): 54 Length (in.): 39 Width (in.): 52
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM123

Emission Point: 10022
Height (ft.): 54 Length (in.): 39 Width (in.): 52
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM4

Emission Point: 10023
Height (ft.): 54 Length (in.): 37 Width (in.): 55
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM4

Emission Point: 10024
Height (ft.): 30 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PM4

Emission Point: 10025



Height (ft.): 30 NYTMN (km.): 4795.829	Diameter (in.): 10 NYTME (km.): 610.36	Building: PM4
Emission Point: 10034 Height (ft.): 54 NYTMN (km.): 4795.829	Diameter (in.): 54 NYTME (km.): 610.36	Building: PM4
Emission Point: 10035 Height (ft.): 54 NYTMN (km.): 4795.829	Diameter (in.): 24 NYTME (km.): 610.36	Building: PM4
Emission Point: 10036 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4
Emission Point: 10037 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4
Emission Point: 10038 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 35 NYTME (km.): 610.36	Width (in.): 47 Building: PM4
Emission Point: 10039 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4
Emission Point: 10040 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4
Emission Point: 10041 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4
Emission Point: 10042 Height (ft.): 5 NYTMN (km.): 4795.829	Diameter (in.): 8 NYTME (km.): 610.36	Building: PM4
Emission Point: 10043 Height (ft.): 30 NYTMN (km.): 4795.829	Diameter (in.): 8 NYTME (km.): 610.36	Building: PM4
Emission Point: 10044 Height (ft.): 54 NYTMN (km.): 4795.829	Length (in.): 32 NYTME (km.): 610.36	Width (in.): 42 Building: PM4

Item 31.2:

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

Emission Unit: 2-00000

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Emission Point: 00014
Height (ft.): 66 Diameter (in.): 18
NYTMN (km.): 4795.852 NYTME (km.): 610.237 Building: PCC

Emission Point: 00015
Height (ft.): 70 Diameter (in.): 18
NYTMN (km.): 4795.853 NYTME (km.): 610.241 Building: PCC

Emission Point: 00016
Height (ft.): 70 Diameter (in.): 18
NYTMN (km.): 4795.856 NYTME (km.): 610.245 Building: PCC

Item 31.3:

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

Emission Unit: 3-00000

Emission Point: 00009
Height (ft.): 231 Diameter (in.): 98
NYTMN (km.): 4795.96 NYTME (km.): 610.485 Building: POWER

Emission Point: 0009A
Height (ft.): 61 Diameter (in.): 52
NYTMN (km.): 4795.924 NYTME (km.): 610.532 Building: POWER

Emission Point: 0009B
Height (ft.): 61 Diameter (in.): 52
NYTMN (km.): 4795.924 NYTME (km.): 610.532 Building: POWER

Emission Point: 0009C
Height (ft.): 61 Diameter (in.): 52
NYTMN (km.): 4795.924 NYTME (km.): 610.532 Building: POWER

Emission Point: 0009D
Height (ft.): 61 Diameter (in.): 52
NYTMN (km.): 4795.924 NYTME (km.): 610.532 Building: POWER

Emission Point: 0009E
Height (ft.): 61 Diameter (in.): 52
NYTMN (km.): 4795.924 NYTME (km.): 610.532 Building: POWER

Item 31.4:

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

Emission Unit: 3-10000

Emission Point: 00011
Height (ft.): 115 Diameter (in.): 72
NYTMN (km.): 4795.949 NYTME (km.): 610.577 Building: POWER

Item 31.5:

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



Emission Unit: 3-20000

Emission Point: 00012
Height (ft.): 223 Diameter (in.): 85
NYTMN (km.): 4795.99 NYTME (km.): 610.569 Building: POWER

Emission Point: 0012A
Height (ft.): 72 Diameter (in.): 48
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: POWER

Emission Point: 0012B
Height (ft.): 72 Diameter (in.): 48
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: POWER

Emission Point: 0012C
Height (ft.): 72 Diameter (in.): 48
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: POWER

Emission Point: 0012D
Height (ft.): 72 Diameter (in.): 48
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: POWER

Item 31.6:

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

Emission Unit: 4-00000

Emission Point: 00006
Height (ft.): 20 Diameter (in.): 4
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 00010
Height (ft.): 90 Diameter (in.): 14
NYTMN (km.): 4795.86 NYTME (km.): 610.753 Building: PULP

Emission Point: 00018
Height (ft.): 75 Diameter (in.): 8
NYTMN (km.): 4795.841 NYTME (km.): 610.84 Building: PULP

Emission Point: 00019
Height (ft.): 165 Diameter (in.): 4
NYTMN (km.): 4795.845 NYTME (km.): 610.792 Building: PULP

Emission Point: 00028
Height (ft.): 143 Diameter (in.): 30
NYTMN (km.): 4795.84 NYTME (km.): 610.838 Building: PULP

Emission Point: 40007
Height (ft.): 83 Diameter (in.): 28
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

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Emission Point: 40008
Height (ft.): 83 Diameter (in.): 28
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40010
Height (ft.): 83 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40011
Height (ft.): 83 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40012
Height (ft.): 83 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40015
Height (ft.): 83 Diameter (in.): 21
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40016
Height (ft.): 83 Diameter (in.): 33
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Emission Point: 40018
Height (ft.): 75 Diameter (in.): 18
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: PULP

Item 31.7:

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

Emission Unit: 5-00000

Emission Point: 50006
Height (ft.): 2 Length (in.): 24 Width (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WWT

Emission Point: 50007
Height (ft.): 20 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WWT

Emission Point: 50008
Height (ft.): 17 Diameter (in.): 12
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WWT

Emission Point: 50024
Height (ft.): 28 Diameter (in.): 8
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WWT

Emission Point: 50025
Height (ft.): 17 Diameter (in.): 12
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WWT

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Item 31.8:

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

Emission Unit: 6-00000

Emission Point: 60001
Height (ft.): 36 Length (in.): 12 Width (in.): 14
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60002
Height (ft.): 36 Length (in.): 12 Width (in.): 14
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60003
Height (ft.): 36 Length (in.): 12 Width (in.): 14
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60004
Height (ft.): 36 Length (in.): 12 Width (in.): 14
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60005
Height (ft.): 36 Length (in.): 12 Width (in.): 14
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60006
Height (ft.): 50 Diameter (in.): 18
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60007
Height (ft.): 50 Diameter (in.): 18
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60008
Height (ft.): 50 Diameter (in.): 30
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60009
Height (ft.): 50 Diameter (in.): 30
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60010
Height (ft.): 42 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60011
Height (ft.): 32 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60012
Height (ft.): 38 Diameter (in.): 24

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NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60013
Height (ft.): 48 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60014
Height (ft.): 24 Length (in.): 18 Width (in.): 18
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Emission Point: 60015
Height (ft.): 74 Diameter (in.): 24
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: WOOD

Item 31.9:

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

Emission Unit: 7-00000

Emission Point: 70003
Height (ft.): 54 Length (in.): 28 Width (in.): 32
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: MISC

Emission Point: 70005
Height (ft.): 30 Diameter (in.): 4
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: MISC

Item 31.10:

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

Emission Unit: 8-00000

Emission Point: 00007
Height (ft.): 22 Diameter (in.): 2
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: CHEM

Emission Point: 80001
Height (ft.): 10 Diameter (in.): 2
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: MISC

Emission Point: 80016
Height (ft.): 20 Diameter (in.): 2
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: CHEM

Emission Point: 80019
Height (ft.): 10 Diameter (in.): 2
NYTMN (km.): 4795.829 NYTME (km.): 610.36 Building: MISC

Condition 32: Process Definition By Emission Unit
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR Subpart 201-6



Item 32.1:

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

Emission Unit: 1-00000
Process: 101 Source Classification Code: 3-07-004-05
Process Description:
Sulfite stock is used by paper machines 1-4 to form paper.

Emission Source/Control: 00101 - Process

Emission Source/Control: 00102 - Process

Emission Source/Control: 00103 - Process

Emission Source/Control: 00104 - Process

Item 32.2:

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

Emission Unit: 2-00000
Process: 201 Source Classification Code: 3-02-016-82
Process Description:
Slaking of lime. Dry lime (CaO) is mixed with water in a slaker, which consists of two reaction tanks and a finished calcium hydroxide (slaked lime) storage tank. The emissions from the slaker are fugitive.

Emission Source/Control: 00201 - Process

Item 32.3:

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

Emission Unit: 2-00000
Process: 202 Source Classification Code: 3-07-004-05
Process Description:
Manufacture of precipitated calcium carbonate (PCC) by combining slaked calcium hydroxide with carbon dioxide which is obtained from power boiler or recovery boiler flue gas in one of three carbonators. Exhaust discharges through carbonator mist eliminators to Emission Points 00014, 00015 and 00016.

Emission Source/Control: 00204 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00206 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00208 - Control
Control Type: MIST ELIMINATOR



Emission Source/Control: 00203 - Process

Emission Source/Control: 00205 - Process

Emission Source/Control: 00207 - Process

Item 32.4:

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

Emission Unit: 3-00000

Process: 301

Source Classification Code: 1-02-006-01

Process Description:

Process consists of natural gas combustion for the power boilers.

Emission Source/Control: 00301 - Combustion

Design Capacity: 68 million BTUs per hour

Emission Source/Control: 00302 - Combustion

Design Capacity: 119 million BTUs per hour

Emission Source/Control: 00303 - Combustion

Design Capacity: 119 million BTUs per hour

Emission Source/Control: 00304 - Combustion

Design Capacity: 133 million Btu per hour

Emission Source/Control: 00305 - Combustion

Design Capacity: 133 million BTUs per hour

Item 32.5:

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

Emission Unit: 3-00000

Process: 302

Source Classification Code: 1-02-004-01

Process Description:

Process consists of #6 fuel oil combustion for the power boilers.

Emission Source/Control: 00301 - Combustion

Design Capacity: 68 million BTUs per hour

Emission Source/Control: 00302 - Combustion

Design Capacity: 119 million BTUs per hour

Emission Source/Control: 00303 - Combustion

Design Capacity: 119 million BTUs per hour

Emission Source/Control: 00304 - Combustion

Design Capacity: 133 million Btu per hour



Emission Source/Control: 00305 - Combustion
Design Capacity: 133 million BTUs per hour

Item 32.6:

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

Emission Unit: 3-00000
Process: 311 Source Classification Code: 1-02-004-01

Process Description:
Combustion of #6 oil in recovery boilers 6 & 7. This may occur when one or more of the power boilers have been taken off-line for maintenance or repair. The exhaust gases are vented through the power boiler stack.

Emission Source/Control: 0309P - Combustion

Emission Source/Control: 0310P - Combustion

Item 32.7:

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

Emission Unit: 3-00000
Process: 333 Source Classification Code: 1-02-004-02

Process Description:
Burning oil in power boiler # 1 to produce exhaust gas for PCC manufacture.

Emission Source/Control: 00301 - Combustion
Design Capacity: 68 million BTUs per hour

Item 32.8:

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

Emission Unit: 3-10000
Process: 303 Source Classification Code: 1-02-006-01

Process Description:
Process consists of natural gas combustion for the woodwaste boiler.

Emission Source/Control: 00306 - Combustion
Design Capacity: 249 million BTUs per hour

Item 32.9:

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

Emission Unit: 3-10000
Process: 304 Source Classification Code: 1-02-004-01

Process Description:
Process consists of #6 fuel oil combustion for the woodwaste boiler

Emission Source/Control: 00306 - Combustion

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Design Capacity: 249 million BTUs per hour

Emission Source/Control: 00307 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00308 - Control
Control Type: WET SCRUBBER

Item 32.10:

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

Emission Unit: 3-10000

Process: 305

Source Classification Code: 1-02-009-01

Process Description:

Process consists of woodwaste combustion in the woodwaste boiler. This includes digester rejects.

Emission Source/Control: 00306 - Combustion
Design Capacity: 249 million BTUs per hour

Emission Source/Control: 00307 - Control
Control Type: GRAVITY COLLECTOR

Emission Source/Control: 00308 - Control
Control Type: WET SCRUBBER

Item 32.11:

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

Emission Unit: 3-20000

Process: 306

Source Classification Code: 1-02-006-02

Process Description:

Process consists of natural gas combustion for the recovery boilers. With this process, the boilers are exhausted through individual stacks as well as through the main recovery boiler stack.

Emission Source/Control: 00309 - Process
Design Capacity: 120 million BTUs per hour

Emission Source/Control: 00310 - Process
Design Capacity: 120 million BTUs per hour

Emission Source/Control: 00311 - Process
Design Capacity: 265 million BTUs per hour

Emission Source/Control: 00312 - Process
Design Capacity: 305 million BTUs per hour

Item 32.12:

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



Emission Unit: 3-20000
Process: 308 Source Classification Code: 3-07-002-22

Process Description:
Process consists of liquor combustion for recovery boilers. It may be in conjunction with oil or natural gas combustion and the exhaust is routed through absorbers and mist eliminators.

Emission Source/Control: 00316 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00317 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00318 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00309 - Process
Design Capacity: 120 million BTUs per hour

Emission Source/Control: 00310 - Process
Design Capacity: 120 million BTUs per hour

Emission Source/Control: 00311 - Process
Design Capacity: 265 million BTUs per hour

Emission Source/Control: 00312 - Process
Design Capacity: 305 million BTUs per hour

Emission Source/Control: 00313 - Process

Emission Source/Control: 00314 - Process

Emission Source/Control: 00315 - Process

Item 32.13:

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

Emission Unit: 3-20000
Process: 309 Source Classification Code: 3-07-002-22

Process Description:
Process consists of storage of liquor and acid during the recovery process.

Emission Source/Control: 00319 - Process

Emission Source/Control: 00322 - Process

Emission Source/Control: 00323 - Process

Emission Source/Control: 00324 - Process



Emission Source/Control: 00325 - Process

Emission Source/Control: 00326 - Process

Emission Source/Control: 00327 - Process

Item 32.14:

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

Emission Unit: 4-00000

Process: 401

Source Classification Code: 3-07-003-04

Process Description:

Sulfur is burned in either of two sulfur burners to produce SO₂ gas. SO₂ gas is cooled in a series of two cooling towers, and then through a packed bed absorption tower. SO₂ is absorbed with ammonia and used as cooking acid for digester. Tail gas is filtered through a mist eliminator.

Emission Source/Control: 00403 - Control
Control Type: MIST ELIMINATOR

Emission Source/Control: 00401 - Process

Emission Source/Control: 00402 - Process

Emission Source/Control: 00404 - Process

Emission Source/Control: 00405 - Process

Emission Source/Control: 00406 - Process

Emission Source/Control: 00407 - Process

Emission Source/Control: 00452 - Process

Item 32.15:

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

Emission Unit: 4-00000

Process: 402

Source Classification Code: 3-07-003-01

Process Description:

Chips and liquor are charged to digester and are allowed to cook. Upon completion of the batch, the pulp is discharged to the blow tank, then through the bleach plant. Off-gas from the digester relief is routed to the sulfur burner absorption tower for recovery of SO₂ for reuse in the process. Weak red liquor that is discharged from the digester is sent to evaporators and then to the recovery boilers. The evaporator off-gas is routed to the fortification tower and then an absorption tower for recovery of SO₂ for reuse in the process.



Emission Source/Control: 00407 - Process
Emission Source/Control: 00408 - Process
Emission Source/Control: 00410 - Process
Emission Source/Control: 00416 - Process
Emission Source/Control: 00417 - Process
Emission Source/Control: 00418 - Process
Emission Source/Control: 00438 - Process
Emission Source/Control: 00449 - Process
Emission Source/Control: 00450 - Process

Item 32.16:

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

Emission Unit: 4-00000
Process: 403 Source Classification Code: 3-07-004-03
Process Description:
Molten sulfur is stored prior to burning in the presence of oxygen to form SO₂ which is subsequently absorbed in ammonia to make sulfite liquor.

Emission Source/Control: 00409 - Process

Item 32.17:

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

Emission Unit: 4-00000
Process: 405 Source Classification Code: 3-07-001-14
Process Description: Chlorine dioxide bleaching of the pulp occurs.

Emission Source/Control: 00437 - Control
Control Type: PACKED GAS ABSORPTION SYSTEM, GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: 00453 - Control
Control Type: FLOATING ROOF

Emission Source/Control: 00454 - Control
Control Type: FLOATING ROOF

Emission Source/Control: 00422 - Process

Emission Source/Control: 00423 - Process



- Emission Source/Control: 00424 - Process
- Emission Source/Control: 00425 - Process
- Emission Source/Control: 00426 - Process
- Emission Source/Control: 00427 - Process
- Emission Source/Control: 00428 - Process
- Emission Source/Control: 00429 - Process
- Emission Source/Control: 00430 - Process
- Emission Source/Control: 00431 - Process
- Emission Source/Control: 00432 - Process
- Emission Source/Control: 00433 - Process
- Emission Source/Control: 00434 - Process
- Emission Source/Control: 00435 - Process
- Emission Source/Control: 00436 - Process
- Emission Source/Control: 00455 - Process
- Emission Source/Control: 00456 - Process

Item 32.18:

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

Emission Unit: 4-00000
Process: 406 Source Classification Code: 3-07-001-22
Process Description: Caustic extraction of the pulp occurs.

- Emission Source/Control: 00419 - Process
- Emission Source/Control: 00420 - Process
- Emission Source/Control: 00421 - Process

Item 32.19:

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

Emission Unit: 4-00000
Process: 407 Source Classification Code: 3-07-001-15
Process Description:
Chlorine dioxide is generated through the R-8 process.

- Emission Source/Control: 00446 - Control



Control Type: WET SCRUBBER
Emission Source/Control: 00440 - Process
Emission Source/Control: 00441 - Process
Emission Source/Control: 00442 - Process
Emission Source/Control: 00443 - Process
Emission Source/Control: 00444 - Process
Emission Source/Control: 00445 - Process

Item 32.20:

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

Emission Unit: 4-00000
Process: 408 Source Classification Code: 3-07-002-99
Process Description: Process consists of filtrate storage.
Emission Source/Control: 00447 - Process
Emission Source/Control: 00448 - Process
Emission Source/Control: 00451 - Process

Item 32.21:

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

Emission Unit: 5-00000
Process: 502 Source Classification Code: 5-03-825-99
Process Description:
Process 502 consists of process wastewater collection.
Wastewater from the paper mill, bark, recovery, woodroom,
and pulp mill areas is collected through lift stations or
pump stations and eventually sent to the wastewater
treatment plant.
Emission Source/Control: 00502 - Process
Emission Source/Control: 00503 - Process
Emission Source/Control: 00504 - Process
Emission Source/Control: 00505 - Process
Emission Source/Control: 00506 - Process

Item 32.22:

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



Emission Unit: 5-00000

Process: 503

Source Classification Code: 5-03-007-02

Process Description:

Process 503 consists of the wastewater treatment plant. The process contains a mix tank, three primary clarifiers, two aeration basins, three secondary clarifiers, two gravity thickeners, three belt filter presses, a sludge blend tank and a dewatering basin.

Emission Source/Control: 00507 - Process

Emission Source/Control: 00508 - Process

Emission Source/Control: 00509 - Process

Emission Source/Control: 00510 - Process

Emission Source/Control: 00511 - Process

Emission Source/Control: 00512 - Process

Emission Source/Control: 00513 - Process

Emission Source/Control: 00514 - Process

Emission Source/Control: 00515 - Process

Emission Source/Control: 00516 - Process

Emission Source/Control: 00517 - Process

Emission Source/Control: 00518 - Process

Emission Source/Control: 00519 - Process

Emission Source/Control: 00520 - Process

Emission Source/Control: 00521 - Process

Emission Source/Control: 00522 - Process

Emission Source/Control: 00523 - Process

Item 32.23:

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

Emission Unit: 6-00000

Process: 601

Source Classification Code: 3-07-008-01

Process Description:

Process consists of removing bark from wood using a drumming system.



Emission Source/Control: 00601 - Process

Item 32.24:

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

Emission Unit: 6-00000
Process: 602 Source Classification Code: 3-07-008-20
Process Description: This process consists of cutting wood into chips.

Emission Source/Control: 00602 - Process

Emission Source/Control: 00611 - Process

Item 32.25:

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

Emission Unit: 6-00000
Process: 603 Source Classification Code: 3-07-040-02
Process Description:
Process consists of pay loader moving bark from piles located in the wood yard to a conveyor that moves the bark to storage in the power plant.

Emission Source/Control: 00603 - Process

Item 32.26:

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

Emission Unit: 6-00000
Process: 604 Source Classification Code: 3-07-008-22
Process Description:
Process consists of air-entrained transport of wood chips, with cyclones for retrieval and disposition of wood dust.

Emission Source/Control: 00604 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00605 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00606 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00607 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00608 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00609 - Control
Control Type: SINGLE CYCLONE



Emission Source/Control: 00602 - Process

Item 32.27:

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

Emission Unit: 6-00000
Process: 605 Source Classification Code: 3-07-040-02
Process Description:
Process consists of offloading logs and moving logs to debarking using cranes.

Emission Source/Control: 00610 - Process

Item 32.28:

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

Emission Unit: 7-00000
Process: 703 Source Classification Code: 3-07-013-99
Process Description:
This process consists of collecting and baling paper trim.

Emission Source/Control: 00704 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00703 - Process

Item 32.29:

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

Emission Unit: 7-00000
Process: 705 Source Classification Code: 3-12-999-99
Process Description:
This process consists of using the babbitt pot for maintaining wood chipper knives.

Emission Source/Control: 00706 - Process

Item 32.30:

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

Emission Unit: 8-00000
Process: 801 Source Classification Code: 4-07-999-97
Process Description:
Process consists of storing volatile organic liquids in tanks with capacities greater than 10,000 gallons but less than 20,000 gallons. Submerged filling process is used to minimize working losses.

Emission Source/Control: 00826 - Control
Control Type: SUBMERGED FILL LINE

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Emission Source/Control: 00825 - Process
Design Capacity: 10,000 gallons

Item 32.31:

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

Emission Unit: 8-00000
Process: 802 Source Classification Code: 4-07-999-97
Process Description:
Process consists storing volatile organic liquids in tanks smaller than 10,000 gallons.

Emission Source/Control: 00804 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 00806 - Control
Control Type: CONSERVATION VENT

Emission Source/Control: 00803 - Process
Design Capacity: 8,000 gallons

Emission Source/Control: 00805 - Process
Design Capacity: 8,300 gallons

Item 32.32:

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

Emission Unit: 8-00000
Process: 803 Source Classification Code: 3-01-870-98
Process Description:
Process consists of storage of liquids that are not volatile organic liquids.

Emission Source/Control: 00817 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00821 - Process
Design Capacity: 10,000 gallons

Emission Source/Control: 00827 - Process

Condition 33: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 33.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-00000



Item 33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (6 minute average), except for one six-minute period per hour of not more than 27 percent opacity. Compliance will be determined by evaluating continuous opacity monitoring system (COMS) records and reports.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 5/30/2012.

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

Condition 34: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement: 6 NYCRR 227-1.4 (b)

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-00000

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation which utilizes a continuous opacity monitoring system (COMS) shall include the following in their quarterly excess emission reports:

- 1) Magnitude, date, and time of each exceedence;
- 2) For each period of excess emissions, specific identification of the cause and corrective action taken;
- 3) Date, time, and duration of each period of COMS downtime, and the corrective action for each period of downtime;

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- 4) Total time the COMS is required to record data during the reporting period;
- 5) The total number of exceedences and the duration of exceedences expressed as a percentage of the total time in which the COMS are required to record data; and
- 6) Such other requirements as the Department may deem necessary in order to enforce Article 19 of the Environmental Conservation Law (ECL).

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 5/30/2012.

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

Condition 35: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR Subpart 227-1

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-00000

Process: 311

Item 35.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Recovery boilers #6 and #7 may combust oil and exhaust through the power boiler stack to maintain power boiler capacity when one or more of the power boilers are out of operation for maintenance or repair. This is not intended to increase power boiler capacity and the recovery boilers may not burn oil at a higher rate than could have been burned in the power boiler/boilers that are out of service. The rates are 453 gallons per hour for boiler #1; 793 gallons per hour for boilers#2 or #3; 883 gallons per hour for boilers #4 or#5.

The facility shall maintain records detailing the time periods and firing rate when recovery boilers are firing oil and listing which power boilers are out of service during those time periods.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 36: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 227-1.2 (a) (1)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-00000 Emission Point: 00009

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

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit is 0.10 lbs per MMBtu while burning oil. Testing to determine compliance with this requirement must be performed once during the permit term unless additional testing is required by the permitting authority. Stack test report shall be submitted to the Permit Administrator within 60 days of completion of the testing.

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 37: Multiple fuels particulate matter emission rate.
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 227-1.5

Item 37.1:

This Condition applies to Emission Unit: 3-10000

Item 37.2:

When two or more different fuels are burned simultaneously in a single furnace of a stationary combustion installation, the permissible emission rate for a contaminant shall be the sum of the permissible emission rates of the contaminant for each fuel multiplied by the heat derived from



such fuel.

Condition 38: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 227-1.2 (a) (4)

Item 38.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-10000 Emission Point: 00011

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

Item 38.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The boiler must achieve an emission rate of 0.3 lbs per million Btu. Particulate emission testing shall be conducted once per permit term unless additional testing is required by the permitting authority. Stack test report shall be submitted to the Permit Administrator within 60 days of completion of the testing.

Upper Permit Limit: 0.3 pounds per million Btus

Reference Test Method: EPA METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 39: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 227-1.2 (a) (4)

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-10000 Emission Point: 00011

Item 39.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Steam output will be limited to maintain boiler heat input below 250 million Btu's per hour. Boiler efficiency will be calculated at 66%. Recordkeeping will be maintained in the boiler #9 heat input log.

Monitoring Frequency: DAILY

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 40: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-10000

Emission Point: 00011

Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

1) Observe the wood waste boiler stack once per day for visible emissions. These observations must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). These observations are not required if the boiler is firing natural gas only.

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- weather condition
was plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) Observation of any visible emissions shall prompt immediate investigation and appropriate corrective action.

If the operator observes any visible emissions (other than steam - see below) two consecutive days, then a Method 9 analysis of the affected emission point must be conducted within two (2) business days of such occurrence.



The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the standard of greater than 20% opacity (six-minute average) except for one six-minute period per hour of greater than 27% opacity is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** Note **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary. However, there is normally a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air, the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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

Condition 41: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 41.1:
The Compliance Certification activity will be performed for:

Emission Unit: 3-20000

Item 41.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

1) Observe the recovery boiler stack once per day for visible emissions. These observations must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). These observations are not required if the boiler is firing natural gas only.

2)The results of each observation must be recorded in a bound logbook or other format acceptable to the



Department. The following data must be recorded:

- weather condition
- was plume observed?

This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) Observation of any visible emissions shall prompt immediate investigation and appropriate corrective action.

If the operator observes any visible emissions (other than steam - see below) two consecutive days, then a Method 9 analysis (based on a 6-minute average) of the affected emission point must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the standard of 20% or greater average opacity for any consecutive 6 minutes is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** Note **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary. However, there is normally a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air, the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 42: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement: 6 NYCRR 212.10 (c) (3)

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-20000



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

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The RACT analysis submitted in June 2004 validated a system-wide limit of 0.55 lbs of NO_x per MMBtu. This is calculated as a monthly block average. This number is under review and may be changed if the new RACT analysis, which is currently in progress, justifies a different emission limit.

NO_x and Oxygen concentrations are monitored continuously with CEMs to calculate a NO_x emission rate.

Manufacturer Name/Model Number: NO_x monitor

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.55 pounds per million Btus

Reference Test Method: Method 7E

Monitoring Frequency: CONTINUOUS

Averaging Method: 30-DAY AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 43: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:40CFR 63, Subpart MM

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-20000

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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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 4/30/2012.

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

Condition 44: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 3-20000

Emission Point: 00012

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The particulate emission rate limit is 0.05 grains per dscf while burning liquor. Emission testing to determine compliance with this limit will be performed once during the permit term unless additional testing is required by the permitting authority. Stack test report shall be submitted to the Permit Administrator within 60 days of completion of the testing.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 45: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:40CFR 63.444(c)(2)(i), Subpart S

Item 45.1:

The Compliance Certification activity will be performed for:



Emission Unit: 4-00000

Regulated Contaminant(s):
CAS No: 000067-56-1 METHYL ALCOHOL

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Total methanol emissions from digester system vents, evaporator system vents and pulp washing systems shall not exceed 2.2 pounds per oven dried ton of pulp produced.

Emissions testing to verify compliance with this requirement will be performed once during the permit term unless changed by the permitting authority.

Upper Permit Limit: 2.2 pounds per ton

Reference Test Method: USEPA Method 308

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 46: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each enclosure and closed-vent system used to comply with 63.450(a) shall comply with the requirements specified:

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in 63.450(b) shall be performed each calendar month to ensure the opening is maintained in the closed position and sealed.

(2) Each closed vent system required by 63.450(a) shall be visually inspected each calendar month. The visible inspection shall include inspection of ductwork, piping,



enclosures and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 63.450(c) measured initially and annually by the procedures in 63.457(d).

(4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 63.457(e).

(5) The valve or closure mechanism specified in 63.450(d)(2) shall be inspected every calendar month to ensure the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

(6) Inspections listed as each calendar month must be at least 14 calendar days apart.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 47: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Regulated Contaminant(s):

CAS No: 000067-56-1 METHYL ALCOHOL

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Digester rate will be maintained at 525 tons of oven dried pulp produced per day or less (at which rate, testing has demonstrated compliance with methanol emissions requirements of not more than 2.2 pounds per oven dried pulp produced). Chip feed rate will be monitored continuously and corrected to dry chip weight by subtracting calculated moisture content which is measured three time per day. Digester rate is tons of dry chips multiplied by an established digester yeild factor and



will be calculated and recorded daily.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: WAFERS/CHIPS
Parameter Monitored: MASS FLOW RATE
Upper Permit Limit: 525 tons per day
Monitoring Frequency: DAILY
Averaging Method: 24-HOUR MAXIMUM - NOT TO BE EXCEEDED
MORE THAN ONCE PER CALENDAR YEAR
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 48: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 48.1:
The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Item 48.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

- For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:
- (1) Date of inspection;
 - (2) The equipment type and identification;
 - (3) Results of negative pressure tests for enclosures;
 - (4) Results of leak detection tests;
 - (5) The nature of the defect or leak and the method of detection;
 - (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
 - (7) Repair methods applied in each attempt to repair the leak or defect;
 - (8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
 - (9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
 - (10) The date of successful repair of the leak or

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defect;

(11) The position and duration of opening of bypass line valves and the condition of any valve seals; and

(12) The duration of the use of bypass valves on computer controlled valves.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 49: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Process: 401

Emission Source: 00402

Item 49.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner shall continuously monitor the pH of the scrubbing solution to the secondary absorber. The pH shall be maintained at or below pH 6.9.

Parameter Monitored: ACIDITY/ALKALINITY

Upper Permit Limit: 6.9 pH (STANDARD) units

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 50: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 50.1:

The Compliance Certification activity will be performed for:

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Process: 401

Emission Source: 00402

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Source owner shall continuously monitor sulfur dioxide emissions from the sulfur burner absorber and convert the data to mass emission rate. Mass emission rate shall not exceed 10 pounds per hour of sulfur dioxide.

Manufacturer Name/Model Number: Dupont, Model 459

Upper Permit Limit: 10 pounds per hour

Reference Test Method: 40CFR60, App. B, PS2

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 51: Bleaching Systems - Closed-vent System and Control Device Requirements

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 51.1:

This Condition applies to Emission Unit: 4-00000

Process: 405

Item 51.2:

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

Condition 52: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Process: 405

Emission Source: 00437

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Regulated Contaminant(s):
CAS No: 007782-50-5 CHLORINE

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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

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

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

Reference Test Method: method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 53: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Process: 405

Emission Source: 00437

Item 53.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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Fan motor amperage of the bleach plant scrubber fan will be continuously monitored and maintained within effective range in accordance with monitoring conditions of 63.453(m), consistent with the petition (Request for Approval for Alternative Monitoring - 4/13/2001) submitted to the USEPA.

Parameter Monitored: CURRENT/CURRENT DRAW

Lower Permit Limit: 120 amperes

Upper Permit Limit: 150 amperes

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 54: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Process: 405

Emission Source: 00437

Item 54.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Recirculation pump motor amperage of the bleach plant scrubber pump will be continuously monitored and maintained within effective range in accordance with monitoring conditions of 63.453(m), consistent with the petition (Request for Approval for Alternative Monitoring - 4/13/2001) submitted to the USEPA.

Parameter Monitored: CURRENT/CURRENT DRAW

Lower Permit Limit: 30 amperes

Upper Permit Limit: 50 amperes

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 55: Compliance Certification



Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 55.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000
Process: 405 Emission Source: 00437

Regulated Contaminant(s):
CAS No: 010049-04-4 CHLORINE DIOXIDE

Item 55.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A minimum scrubber pH of 10.35 must be maintained at all times that the process is in operation. Source owner shall install, calibrate, operate and maintain a continuous monitor and data recorder for scrubber pH. Compliance will be based on a 1 hour average.

Parameter Monitored: ACIDITY/ALKALINITY
Lower Permit Limit: 10.35 pH (STANDARD) units
Monitoring Frequency: CONTINUOUS
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 56: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000
Process: 407 Emission Source: 00446

Regulated Contaminant(s):
CAS No: 010049-04-4 CHLORINE DIOXIDE

Item 56.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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Facility DEC ID: 5520500005



Monitoring Description:

The R8 scrubber used to control chlorine dioxide emissions shall achieve a treatment device outlet concentration of 105 parts per million or less by volume. Emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority. The test shall measure the treatment outlet device concentration of chlorine dioxide using EPA Method 26A as modified by 40CFR63.457(b)(5)(ii).

Upper Permit Limit: 105 parts per million (by volume)

Reference Test Method: EPA Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 57: Compliance Certification

Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement: 6 NYCRR 212.4 (a)

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-00000

Process: 407

Emission Source: 00446

Regulated Contaminant(s):

CAS No: 010049-04-4

CHLORINE DIOXIDE

Item 57.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously monitor and record chlorine dioxide concentration in the R8 scrubber exhaust except during CEM quality control checks or routine maintenance. Chlorine dioxide concentration shall not exceed 105 ppm.

Manufacturer Name/Model Number: CIO2 monitor

Upper Permit Limit: 105 parts per million (by volume)

Reference Test Method: EPA Method 26A

Monitoring Frequency: CONTINUOUS

Averaging Method: 24-HOUR AVERAGE



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

Condition 58: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (iv)

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 8-00000
Process: 801

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity greater than or equal to 10,000 gallons but less than 20,000 gallons must be equipped with submerged fill. The permittee shall visually inspect the submerged fill line on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 59: Compliance Certification
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable Federal Requirement:6 NYCRR 229.3 (e) (2) (v)

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: 8-00000
Process: 802

Item 59.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Storage tanks subject to this requirement, with a capacity of less than 10,000 gallons must be equipped with

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a conservation vent. The permittee shall visually inspect the conservation vent on an annual basis to ensure proper operation. Inspection records must be maintained on site for a period of 5 years. Records shall contain the date(s) of all inspections, inspection findings and a listing of all equipment repairs or replacements.

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

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

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

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

Condition 60: Contaminant List
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:ECL 19-0301

Item 60.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000067-56-1
Name: METHYL ALCOHOL



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

CAS No: 007782-50-5
Name: CHLORINE

CAS No: 010049-04-4
Name: CHLORINE DIOXIDE

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

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

**Condition 61: Unavoidable noncompliance and violations
Effective between the dates of 01/09/2012 and 01/08/2017**

Applicable State Requirement: 6 NYCRR 201-1.4

Item 61.1:

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

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

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



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

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

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

Condition 62: Visible Emissions Limited
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 211.2

Item 62.1:

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

Condition 63: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 212.6 (a)

Item 63.1:

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

Emission Unit: 1-00000

Emission Unit: 2-00000

Emission Unit: 6-00000

Emission Unit: 7-00000

Item 63.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall 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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

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

Condition 64: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 212.4 (c)

Item 64.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-00000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 64.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particles are limited to less than 0.05 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry 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: method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

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Condition 65: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 227-1.4 (a)

Item 65.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-00000

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 65.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Any person who owns a stationary combustion installation with a maximum heat input capacity exceeding 250 million Btu per hour shall install, operate in accordance with manufacturer's instructions, and properly maintain accurate instruments satisfying the criteria in Appendix B of Title 40 Part 60 of the Code of Federal Regulations for continuously monitoring and recording opacity.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Appendix B, 40CFR

Monitoring Frequency: CONTINUOUS

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 5/30/2012.

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

Condition 66: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 227-2.3 (c)

Item 66.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-00000

Regulated Contaminant(s):

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

Item 66.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Compliance with the system-wide limit (0.45 lbs/ MMBtu) for the power boilers is based on recording fuel use (both natural gas and #6 oil) and calculating the system wide average NOx emissions for the fiscal month. Calculation is the sum of the monthly NOx emissions from the 5 power boilers divided by the total heat content of the fuel burned. Boiler NOx emission rates will be established by the most recent emissions test.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 67: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 67.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-00000

Regulated Contaminant(s):

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

Item 67.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The power boilers burn natural gas as the preferred fuel with #6 fuel oil as an alternate. With the exception noted below, natural gas must be used unless the cost per MMBtu exceeds the cost per MMBtu of oil by more than \$0.58 or if the natural gas supply has been curtailed. Source owner must maintain a log book listing cost per MMBtu of oil and natural gas and the difference in cost for each day that oil is burned in the power boilers. A new RACT analysis must be submitted by January 1, 2012 and that analysis may determine a different cost per MMBtu in the future.

When the recovery boilers (EU-32000; ES 309-312) are not operating on liquor, boiler #1 (EU-30000; ES 301) may burn oil on a limited basis to produce exhaust gas suitable for



manufacture of precipitated calcium carbonate (PCC).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 68: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 68.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-00000

Regulated Contaminant(s):

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

Item 68.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Normal operation for power boiler #1 is to burn natural gas whenever the cost per MMBtu of gas does not exceed the cost per MMBtu of oil by \$0.58 or more. When the cost differential exceeds \$0.58 per MMBtu, oil may be burned without restriction. However, if the cost differential is less than \$0.58 per MMBtu when the recovery boilers (EU-320000; ES 309-312) are not burning liquor, oil may be burned on a limited basis to produce exhaust gas suitable for manufacture of precipitated calcium carbonate (PCC). During this scenario, all exhaust gas from this source (with the exception of startup, shutdown and short term emergency bypass) will go through the PCC manufacture process. A log will be maintained, listing the hours operating under this scenario and certifying that all exhaust gas has been diverted to the PCC process.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 69: Compliance Demonstration



Effective between the dates of 01/09/2012 and 01/08/2017

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

Item 69.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-00000

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

Item 69.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis submitted in June 2004 established a system wide average standard of 0.45 lbs of NOX emissions per MMBtu. Emission testing to determine compliance with this limit will be performed for each power boiler once during the permit term unless additional testing is required by the permitting authority.
A new RACT analysis must be submitted by January 1, 2012.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 0.45 pounds per million Btus
Reference Test Method: Method 7E
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2012.
Subsequent reports are due every 6 calendar month(s).

Condition 70: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 227-2.6 (a)

Item 70.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-10000

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

Item 70.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Per the NOx RACT determination submitted in June 2004, the emission limit for the wood waste boiler is 0.28 lbs of NOx emissions per MMBtu. This is calculated as a monthly block average. Emission testing to verify emission rates burning wood, oil and natural gas will be performed once during the permit term unless additional testing is required by the permitting authority. A new RACT analysis must be submitted by January 1, 2012.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

Condition 71: Compliance Demonstration
Effective between the dates of 01/09/2012 and 01/08/2017

Applicable State Requirement:6 NYCRR 212.4 (a)

Item 71.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 3-20000

Emission Point: 00012

Regulated Contaminant(s):

CAS No: 007446-09-5

SULFUR DIOXIDE

Item 71.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Compliance based on continuous monitoring of sulfur dioxide concentration at emission point 00012.

Manufacturer Name/Model Number: SO2 Monitor

Parameter Monitored: SULFUR DIOXIDE

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

Reference Test Method: Method 6C

Monitoring Frequency: CONTINUOUS

Averaging Method: 4-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2012.

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

