

**New York State Department of Environmental Conservation**  
**Facility DEC ID: 5532600004**



**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 5-5326-00004/00049  
Mod 0 Effective Date: 02/13/2006 Expiration Date: 02/12/2011  
  
Mod 1 Effective Date: Expiration Date:

Permit Issued To: HOLLINGSWORTH & VOSE CO  
112 WASHINGTON ST  
EAST WALPOLE, MA 02032-1098

Contact: MARIO CANGEMI  
HOLLINGSWORTH & VOSE CO  
5035 CO RTE 113  
GREENWICH, NY 12834  
(518) 695-8145

Facility: HOLLINGSWORTH & VOSE-EASTON MILL  
CO RT 113  
EASTON, NY 12834

**Description:**

Hollingsworth & Vose Company's Easton Facility is a manufacturer of technical industrial papers and non-woven fabrics and is located in the Town of Easton, Washington County. At this facility, various papers or fabrics are formed, coated/saturated and dried/cured using three different paper machines. In all cases, the process begins by spreading a slurry containing wood pulp and/or other fiber onto a former and removing the moisture to form a paper or fabric web. For some formulations, a coating is sprayed onto the web during this part of the process in order to facilitate operations that occur further down the line. All wood pulp and/or other fiber used in the process is purchased from outside suppliers.

From here, the process varies depending upon the product being made. In some cases, no further processing occurs. In most cases, coatings (i.e., binders) are applied and the web is dried again. Sometimes, additional coatings are applied. The paper machines also have the ability to cure certain coatings by using natural gas fired curing units. The finished product is rolled into large rolls which may be converted into smaller sizes prior to packaging and shipment.

Processes performed on the three paper machines are grouped together as Emission Unit U-PAPER, and are regulated under 6 NYCRR Parts 212 and 228. Emissions of formaldehyde and 1,3-dichloro-2-propanol have been limited in order to comply with requirements contained in Section 212.4. Monitoring and record keeping of product usage, formulations produced and resulting emissions of these contaminants are required in order to demonstrate compliance with the limits. Coating processes must also use compliant coatings as specified in Section 228.7. This limits the quantity of volatile organic



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compounds (VOC) emitted during coating.

For some of the coatings used, ingredients are first dispersed in a mixer (Emission Source MIXR1) before being charged to the coater head tank. This mixer is the only Emission Source in Emission Unit U-MIXRS, and is regulated under 6 NYCRR Part 212. In many cases, coatings are mixed in other tanks which are exempt from permitting requirements.

Steam heated can dryers are used to dry the paper or fabric web, with steam provided by two dual fueled (natural gas/No. 6 fuel oil) boilers having rated capacities of 43.4 mmBTU/hr and 32.5 mmBTU/hr heat input (Emission Sources 00001 and 00002). For Paper Machine No. 10, drying is aided by a Thru-dryer, fired with natural gas. This Thru-dryer is exempt from permitting requirements. The two boilers are grouped together as Emission Unit U-BOILR, and are regulated under 6 NYCRR Part 227. Emissions of Sulfur Dioxide (SO<sub>2</sub>) and Oxides of Nitrogen (NO<sub>x</sub>) from this facility have been capped at 169 tpy and 83 tpy, respectively. These caps were established in 1995 to prevent the need for a full Prevention of Significant Deterioration (PSD) review, under 40 CFR 52.21(i), when Paper Machine No. 8 was installed. The cap on NO<sub>x</sub> emissions also serves to cap the combustion units out of Reasonably Available Control Technology (RACT) requirements contained in 6 NYCRR, Subpart 227-2 for that contaminant. Monitoring, recordkeeping and reporting of fuel use are required to demonstrate compliance with these limits. Fuel use for the entire facility is monitored, thereby appropriately accounting for SO<sub>2</sub> and NO<sub>x</sub> emissions from several exempt combustion units in the totals. Notification requirements contained in National Emissions Standards for Hazardous Air Pollutants (NESHAP) for industrial boilers, under 40CFR 63, Subpart DDDDD, has been provided. There are no additional Subpart DDDDD requirements for the existing boilers at this time.

Pulp from the broke (i.e., the waste paper from the process) is recovered by first dissolving the material in the Broke Beater (ES BEATR) and then washing the resulting pulp slurry in the Broke Washer (ES WASHR). It is then re-used in the process. Emission Unit U-BROKE covers these emission sources, which are regulated under 6 NYCRR Part 212.

This facility is subject to requirements contained in the NESHAP for controlling organic hazardous air pollutants (HAPs) from paper and other web coating operations, under 40CFR 63, Subpart JJJJ. Organic HAPs are limited to no more than 20 percent of the mass of solids "as purchased" for each month. Records will be maintained to demonstrate compliance with this standard.

In addition to formaldehyde, 1,3-dichloro-2-propanol, HAPs, VOC, SO<sub>2</sub> and NO<sub>x</sub>, Hollingsworth & Vose Company's Easton Facility is regulated for the following pollutants: Carbon Monoxide (CO), Particulates (PM), and Sulfuric Acid. The facility has the potential to emit SO<sub>2</sub> and HAPs above the Title V major source thresholds.

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

Permit Administrator:           WALTER L HAYNES  
                                          DIVISION OF ENVIRONMENTAL PERMITS  
                                          232 GOLF COURSE RD PO BOX 220

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WARRENSBURG, NY 12885-0220

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_\_



**Notification of Other State Permittee Obligations**

**Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

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

**Item B: Permittee's Contractors to Comply with Permit**

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

**Item C: Permittee Responsible for Obtaining Other Required Permits**

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

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



**DEC GENERAL CONDITIONS**

**\*\*\*\* General Provisions \*\*\*\***

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

**Item 1-1.1:**

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

**Item 1-1.2:**

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

**Item 1-1.3:**



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

**Condition 3: Applications for Permit Renewals and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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

**Condition 1-2: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.13**

**Item 1-2.1:**

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

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

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

**Item 4.1:**

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

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;

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- 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 Applications for Permit Modification or Renewal -REGION 5 SUBOFFICE**

**Applicable State Requirement: 6NYCRR 621.5(a)**

**Expired by Mod No: 1**

**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, PO Box 220  
Warrensburg, NY 12885-0220  
(518) 623-1281

**Condition 1-3: Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG**

**Applicable State Requirement: 6NYCRR 621.6(a)**

**Item 1-3.1:**

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

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



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**Permit Under the Environmental Conservation Law (ECL)**

**ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT**

**IDENTIFICATION INFORMATION**

Permit Issued To: HOLLINGSWORTH & VOSE CO  
112 WASHINGTON ST  
EAST WALPOLE, MA 02032-1098

Facility: HOLLINGSWORTH & VOSE-EASTON MILL  
CO RT 113  
EASTON, NY 12834

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

Permit Effective Date:

Permit Expiration Date:



**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1-1 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 11 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 22 6NYCRR 201-6: Emission Unit Definition
- 25 6NYCRR 201-7: Facility Permissible Emissions
- \*1-2 6NYCRR 201-7: Capping Monitoring Condition
- \*26 6NYCRR 201-7: Capping Monitoring Condition
- 1-3 6NYCRR 212.4(a): Compliance Certification
- 1-4 6NYCRR 212.4(a): Compliance Certification
- 29 6NYCRR 212.4(a): Compliance Certification
- 32 6NYCRR 212.4(a): Compliance Certification

**Emission Unit Level**

- 39 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 40 6NYCRR 201-6: Process Definition By Emission Unit

**EU=U-PAPER,Proc=016**

- 1-5 6NYCRR 201-6.5: Compliance Certification

**EU=U-PAPER,Proc=016,ES=010SC**

- 1-6 6NYCRR 212.4(a): Compliance Certification

**EU=U-PAPER,Proc=AAA**

- 1-7 6NYCRR 212.4(a): Compliance Certification
- 50 6NYCRR 212.4(a): Compliance Certification

**EU=U-PAPER,EP=09C10,Proc=016**

- 1-8 6NYCRR 212.4(a): Compliance Certification
- 51 6NYCRR 212.4(a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 52 ECL 19-0301: Contaminant List

NOTE: \* preceding the condition number indicates capping.



**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 - 6NYCRR Part 201-1.5**

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

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

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

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

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

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

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

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

**Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR 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 Part 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 Part 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 Part 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 Part 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 - 6NYCRR Part 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

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order to maintain compliance with the conditions of this permit.

**Item H: Property Rights - 6 NYCRR Part 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 Part 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 Part 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

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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 Part 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



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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 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 1-1: Prohibition of Reintroduction of Collected Contaminants to the air  
Effective for entire length of Permit**



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**Applicable Federal Requirement: 6NYCRR 201-1.8**

**Replaces Condition(s) 11**

**Item 1-1.1:**

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

**Condition 11: Prohibition of Reintroduction of Collected Contaminants to the air**  
**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-1.8**

**Replaced by Condition(s) 1-1**

**Item 11.1:**

No person shall 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.

**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 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 22.1(From Mod 1):**

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

Emission Unit: U-PAPER

Emission Unit Description:

Paper making operations on Paper Machine Nos. 8, 9 and 10. This includes forming, drying and coating/saturating of a paper or fabric web on each of the three machines. Paper Machine Nos. 8, 9 and 10 also have natural gas fired curing units to enhance sheet properties through additional drying.

Building(s): EASTON MIL

**Item 22.2(From Mod 0):**

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



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Emission Unit: U-BOILR

Emission Unit Description:

Two (2) boilers with combined heat input capacity of 75.9 mmBtu/hr fired with either No. 6 fuel oil or natural gas.

Building(s): BOILERHOUS

**Item 22.3(From Mod 0):**

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

Emission Unit: U-BROKE

Emission Unit Description:

Broke is processed for reuse in paper making operations. It is first broken down using caustic and steam heat in a beater type mixer (PR 003) vented to emission point 00024. Then, it is washed in a process also using caustic and steam heat in a beater type mixer (PR 004) vented to emission point 00025.

Building(s): EASTON MIL

**Item 22.4(From Mod 0):**

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

Emission Unit: U-MIXRS

Emission Unit Description:

Chemical mixing exhaust system - includes one mixing tank (ES MIXR1) used for mixing of ingredients such as clay and titanium dioxide with liquid ingredients and vented to Emission Point No. 009A7.

Building(s): EASTON MIL

**Condition 25: Facility Permissible Emissions**

**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7**

**Item 25.1:**

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

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

CAS No: 007446-09-5 (From Mod 1) PTE: 338,000 pounds per year  
Name: SULFUR DIOXIDE

CAS No: 0NY210-00-0 (From Mod 1) PTE: 166,000 pounds per year  
Name: OXIDES OF NITROGEN

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**Condition 1-2: Capping Monitoring Condition**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 201-7**

**Replaces Condition(s) 26**

**Item 1-2.1:**

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

40CFR 52-A.21

**Item 1-2.2:**

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

**Item 1-2.3:**

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

**Item 1-2.4:**

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

**Item 1-2.5:**

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

**Item 1-2.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 1-2.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: MONITORING OF PROCESS OR CONTROL

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**DEVICE PARAMETERS AS SURROGATE**

**Monitoring Description:**

Facility-wide emissions of SO<sub>2</sub> shall not exceed 169 tons per year (338,000 lbs/yr) as determined by summing monthly SO<sub>2</sub> emissions during any consecutive 12-month period.

Records shall be maintained on-site which demonstrate compliance with the SO<sub>2</sub> emission cap. These records shall include the mass emissions totaled over each month, the total mass emissions over each rolling twelve (12) month period, fuel use (both No. 6 fuel oil and natural gas) and emission factors used in calculating emissions.

Monthly fuel usage quantities shall be used to calculate corresponding monthly SO<sub>2</sub> emissions according to the following formulas for the specific fuel burned:

**Natural Gas:**

$$\text{SO}_2 \text{ (lbs/month)} = 6\text{E-}7 \text{ lbs/std. cu. ft.} \times \text{NG}$$

where NG is the amount of natural gas burned per month, in standard cubic feet

**No. 6 Fuel Oil:**

$$\text{SO}_2 \text{ (lbs/month)} = .157\text{S lbs/gallon} \times \text{FO}$$

where FO is the gallons of No. 6 fuel oil burned per month; and

S is the sulfur content of the No. 6 fuel oil burned, %

(assumed to be 1.5% unless documentation shows otherwise)

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 169 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



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Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004

**Condition 26: Capping Monitoring Condition**

**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-7**

**Replaced by Condition(s) 1-2**

**Item 26.1:**

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

40CFR 52-A.21

**Item 26.2:**

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

**Item 26.3:**

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

**Item 26.4:**

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

**Item 26.5:**

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

**Item 26.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 26.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

**New York State Department of Environmental Conservation**

**Permit ID: 5-5326-00004/00049**

**Facility DEC ID: 5532600004**



Monitoring Description:

Facility-wide emissions of SO<sub>2</sub> shall not exceed 169 tons per year (338,000 lbs/yr) as determined by summing monthly SO<sub>2</sub> emissions during any consecutive 12-month period.

Records shall be maintained on-site which demonstrate compliance with the SO<sub>2</sub> emission cap. These records shall include the mass emissions totaled over each month, the total mass emissions over each rolling twelve (12) month period, fuel use (both No. 6 fuel oil and natural gas) and emission factors used in calculating emissions.

Monthly fuel usage quantities shall be used to calculate corresponding monthly SO<sub>2</sub> emissions according to the following formulas for the specific fuel burned:

Natural Gas:

$$\text{SO}_2 \text{ (lbs/month)} = 6\text{E-}7 \text{ lbs/std. cu. ft.} \times \text{NG}$$

where NG is the amount of natural gas burned per month, in standard cubic feet

No. 6 Fuel Oil:

$$\text{SO}_2 \text{ (lbs/month)} = 157\text{S lbs/gallon} \times \text{FO}$$

where FO is the gallons of No. 6 fuel oil burned per month; and

S is the sulfur content of the No. 6 fuel oil burned, %

(assumed to be 1.5% unless documentation shows otherwise)

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 169 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

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**Facility DEC ID: 5532600004**



**Condition 1-3: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 32**

**Item 1-3.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER  
Process: 016                      Emission Source: 0DRY9

Emission Unit: U-PAPER  
Process: 016                      Emission Source: DRY10

Emission Unit: U-PAPER  
Process: AAA                      Emission Source: 00PM8

Regulated Contaminant(s):  
CAS No: 000050-00-0      FORMALDEHYDE

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner shall limit annual emissions of formaldehyde from Paper Machine Nos. 8, 9 & 10 to a total of 7,170 lbs. or less, during any twelve (12) consecutive months, rolled monthly, with no more than 420 lbs. of the total contributed by Paper Machine No. 8.

The formulations run on each paper machine shall be monitored and recorded along with the time, date and duration of the run, in order to document that this annual emission limit is not exceeded. This record shall include, for each month, acceptable calculations of the pounds of formaldehyde emitted from Paper Machine No. 8 alone and the overall total from the emission unit for that month, as well as the total amounts emitted from Paper Machine No. 8 and the overall total for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the applicable limits stated above.



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**Facility DEC ID: 5532600004**

Parameter Monitored: FORMALDEHYDE  
Upper Permit Limit: 7170 pounds  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-4: Compliance Certification**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 29**

**Item 1-4.1:**

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

Emission Unit: U-PAPER  
Process: AAA                      Emission Source: 00PM8

Regulated Contaminant(s):  
CAS No: 000050-00-0      FORMALDEHYDE

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner shall limit annual emissions of formaldehyde from Paper Machine Nos. 8, 9 & 10 to a total of 7,170 lbs. or less, during any twelve (12) consecutive months, rolled monthly, with no more than 420 lbs. of the total contributed by Paper Machine No. 8.

The formulations run on each paper machine shall be monitored and recorded along with the time, date and duration of the run, in order to document that this annual emission limit is not exceeded. This record shall include, for each month, acceptable calculations of the pounds of formaldehyde emitted from Paper Machine No. 8 alone and the overall total from the emission unit for that month, as well as the total amounts emitted from Paper Machine No. 8 and the overall total for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the applicable limits stated

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above.

Parameter Monitored: FORMALDEHYDE  
Upper Permit Limit: 420 pounds  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 6 calendar month(s).

**Condition 29: Compliance Certification**  
**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-4**

**Item 29.1:**

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

Emission Unit: U-PAPER  
Process: AAA                      Emission Source: 00PM8

Regulated Contaminant(s):  
CAS No: 000050-00-0      FORMALDEHYDE

**Item 29.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner shall limit annual emissions of formaldehyde from Paper Machine Nos. 8, 9 & 10 to a total of 7,170 lbs. or less, during any twelve (12) consecutive months, rolled monthly, with no more than 420 lbs. of the total contributed by Paper Machine No. 8.

The formulations run on each paper machine shall be monitored and recorded along with the time, date and duration of the run, in order to document that this annual emission limit is not exceeded. This record shall include, for each month, acceptable calculations of the pounds of formaldehyde emitted from Paper Machine No. 8 alone and the overall total from the emission unit for that month, as well as the total amounts emitted from Paper Machine No. 8 and the overall total for the past

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consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the applicable limits stated above.

Parameter Monitored: FORMALDEHYDE  
Upper Permit Limit: 420 pounds  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2006.  
Subsequent reports are due every 6 calendar month(s).

**Condition 32: Compliance Certification**  
**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-3**

**Item 32.1:**

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

Emission Unit: U-PAPER  
Process: 016                      Emission Source: 0DRY9

Emission Unit: U-PAPER  
Process: 016                      Emission Source: DRY10

Emission Unit: U-PAPER  
Process: AAA                      Emission Source: 00PM8

Regulated Contaminant(s):  
CAS No: 000050-00-0      FORMALDEHYDE

**Item 32.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner shall limit annual emissions of formaldehyde from Paper Machine Nos. 8, 9 & 10 to a total of 7,170 lbs. or less, during any twelve (12) consecutive months, rolled monthly, with no more than 420 lbs. of the total contributed by Paper Machine No. 8.

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The formulations run on each paper machine shall be monitored and recorded along with the time, date and duration of the run, in order to document that this annual emission limit is not exceeded. This record shall include, for each month, acceptable calculations of the pounds of formaldehyde emitted from Paper Machine No. 8 alone and the overall total from the emission unit for that month, as well as the total amounts emitted from Paper Machine No. 8 and the overall total for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the applicable limits stated above.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 7170 pounds

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2006.

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

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

**Condition 39: Emission Point Definition By Emission Unit  
Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 39.1(From Mod 1):**

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

Emission Unit: U-PAPER

Emission Point: 09C10

Height (ft.): 87

Diameter (in.): 60

Building: EASTON MIL

**Item 39.2(From Mod 0):**

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

Emission Unit: U-BOILR

Emission Point: 00018

Height (ft.): 115

Diameter (in.): 42



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NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: BOILERHOUS

**Item 39.3(From Mod 0):**

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

Emission Unit: U-BROKE

Emission Point: 00024

Height (ft.): 20

Diameter (in.): 12

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 00025

Height (ft.): 14

Diameter (in.): 16

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

**Item 39.4(From Mod 0):**

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

Emission Unit: U-MIXRS

Emission Point: 009A7

Height (ft.): 26

Diameter (in.): 12

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

**Item 39.5(From Mod 0):**

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

Emission Unit: U-PAPER

Emission Point: 008A1

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: NO. 14

Emission Point: 008A2

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: NO. 14

Emission Point: 008A3

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: NO. 14

Emission Point: 008A4

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 008A5

Height (ft.): 39

Diameter (in.): 49



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**Facility DEC ID: 5532600004**

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 008A6

Height (ft.): 39 Diameter (in.): 49

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 009A1

Height (ft.): 37 Diameter (in.): 24

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 009A2

Height (ft.): 37 Diameter (in.): 24

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 009A3

Height (ft.): 37 Diameter (in.): 24

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 010A1

Height (ft.): 36 Length (in.): 22 Width (in.): 33

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 010A2

Height (ft.): 36 Length (in.): 22 Width (in.): 33

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

Emission Point: 010A3

Height (ft.): 31 Length (in.): 18 Width (in.): 18

NYTMN (km.): 4774.524 NYTME (km.): 616.432 Building: EASTON MIL

**Condition 40: Process Definition By Emission Unit  
Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 40.1(From Mod 1):**

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

Emission Unit: U-PAPER

Process: 016

Source Classification Code: 4-02-013-01

Process Description:

Various coatings/binders may be applied to the paper web at different points, depending upon the machine being used and the formulation being made. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units. Emissions from Paper



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Machine No. 10's "dry-end" (DRY10) are vented to wet scrubber (010CS) and exhausted through emission point 09C10.

Emission Source/Control: 010SC - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 0DRY9 - Process

Emission Source/Control: 0WET9 - Process

Emission Source/Control: DRY10 - Process

**Item 40.2(From Mod 1):**

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

Emission Unit: U-PAPER

Process: AAA

Source Classification Code: 4-02-013-01

Process Description:

Coatings are sprayed onto the paper web on Paper Machine No. 8.

Emission Source/Control: 00PM8 - Process

**Item 40.3(From Mod 0):**

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

Emission Unit: U-BOILR

Process: 001

Source Classification Code: 1-02-004-02

Process Description:

Two small boilers whose combined heat input capacity is 75.9 mmBtu/hr; this process involves firing them with No. 6 fuel oil.

Emission Source/Control: 00001 - Combustion

Design Capacity: 43.4 million Btu per hour

Emission Source/Control: 00002 - Combustion

Design Capacity: 32.5 million Btu per hour

**Item 40.4(From Mod 0):**

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

Emission Unit: U-BOILR

Process: 002

Source Classification Code: 1-02-006-02

Process Description:

Two small boilers whose combined heat input capacity is



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75.9 mmbtu/hr; this process involves firing them with natural gas.

Emission Source/Control: 00001 - Combustion  
Design Capacity: 43.4 million Btu per hour

Emission Source/Control: 00002 - Combustion  
Design Capacity: 32.5 million Btu per hour

**Item 40.5(From Mod 0):**

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

Emission Unit: U-BROKE

Process: 003

Source Classification Code: 3-07-999-99

Process Description:

Exhaust vent from broke beater. Caustic is added to broke and broke is steam heated. Vapors are vented to outside air.

Emission Source/Control: BEATR - Process

**Item 40.6(From Mod 0):**

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

Emission Unit: U-BROKE

Process: 004

Source Classification Code: 3-07-999-99

Process Description:

Exhaust vent from broke wash beater. Caustic is added to broke and broke is steam heated. The vapors are vented to the outside air.

Emission Source/Control: WASHR - Process

**Item 40.7(From Mod 0):**

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

Emission Unit: U-MIXRS

Process: 00A

Source Classification Code: 4-02-013-03

Process Description:

Chemical mixing of ingredients such as clay and titanium dioxide.

Emission Source/Control: MIXR1 - Process

**Item 40.8(From Mod 0):**

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



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Emission Unit: U-PAPER

Process: OAA

Source Classification Code: 3-07-999-01

Process Description:

On No. 8 Paper Machine, a wet web of paper passes over steam heated can dryers. For some papers, sprays are applied (see Process ID AAA). For some papers, infrared curing is used to enhance paper properties. Exhausts are vented to 4 emission points on roof. In addition, 2 emission points may be added to this source as previously approved.

Emission Source/Control: 00PM8 - Process

**Item 40.9(From Mod 0):**

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

Emission Unit: U-PAPER

Process: 0BB

Source Classification Code: 3-07-999-99

Process Description:

On Paper Machine No. 9 wet end, a wet web of paper is formed and passes over steam heated can dryers. For some papers, sprays are applied (see Process ID 016). The exhausts are vented to 3 emission points on roof.

Emission Source/Control: 0WET9 - Process

**Item 40.10(From Mod 0):**

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

Emission Unit: U-PAPER

Process: 0CC

Source Classification Code: 3-07-999-99

Process Description:

On Paper Machine No. 10 a wet web of paper is formed and passes over steam heated can dryers and thru-dryer. The exhausts are vented to 3 emission points on roof.

Emission Source/Control: WET10 - Process

**Condition 1-5: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 201-6.5**

**Item 1-5.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

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**Facility DEC ID: 5532600004**



Process: 016

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall complete the following actions in order to ensure future compliance with the Order on Consent (File No. R5-20060612-629), applicable laws and regulations including but not limited to 6NCYRR 201-6.5(a)(2).

1. Permittee will maintain and operate the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.

2. On or before November 15, 2006, permittee will submit and Engineering Plan ("Plan") to the Department for approval for achieving and/or maintaining compliance with Title V permit and 6NYCRR 212.4(a) for formaldehyde emissions.

- Completed October 23, 2006

3. Within one (1) month of receiving approval of the Plan in paragraph 2, permittee will submit to the Department an approvable application to modify its Title V Air permit as appropriate.

- Completed November 20, 2006

4. Permittee shall comply with all terms identified in the Plan including the Expanded Test Program, submitted on January 25, 2007, to the satisfaction of the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-6: Compliance Certification  
Effective for entire length of Permit**

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**Facility DEC ID: 5532600004**



**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 1-6.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: 016

Emission Source: 010SC

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

To assure compliance with the 1.85 lbs/hr formaldehyde emission limit for emission point 09C10 and provide the basis for emission factors used in other formaldehyde compliance certification activities, the scrubbing solution flow rate shall be at least 120 gpm when running formulations containing formaldehyde.

The minimum flow rate may need to be revised based on the results of the required performance testing

Parameter Monitored: FLOW RATE

Lower Permit Limit: 120 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
VALUE AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 1-7: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 50**

**Item 1-7.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: AAA

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

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**Facility DEC ID: 5532600004**



**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The hourly emission rate of formaldehyde from Paper Machine No. 8 (ES 00PM8) shall not exceed 0.15 lbs/hr.

Source owner shall notify the Department within thirty (30) days of commencement of the use of formaldehyde-containing coatings on Paper Machine No. 8. R & D activities are not considered as part of the commencement of use.

For the purpose of ascertaining compliance or noncompliance with this limit, source owner shall perform stack testing of the emission points involved within ninety (90) days of the first use of a formaldehyde-containing coating and once per permit term thereafter. An acceptable report of the measured emissions shall be submitted within sixty (60) days of completion of each test.

Upper Permit Limit: 0.15 pounds per hour

Reference Test Method: NCASI Method 98.01 or other method approved by DEC

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 50: Compliance Certification**

**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-7**

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: AAA

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

**New York State Department of Environmental Conservation**

**Permit ID: 5-5326-00004/00049**

**Facility DEC ID: 5532600004**



**Item 50.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The hourly emission rate of formaldehyde from Paper Machine No. 8 (ES 00PM8) shall not exceed 0.15 lbs/hr.

Source owner shall notify the Department within thirty (30) days of commencement of the use of formaldehyde-containing coatings on Paper Machine No. 8. R & D activities are not considered as part of the commencement of use.

For the purpose of ascertaining compliance or noncompliance with this limit, source owner shall perform stack testing of the emission points involved within ninety (90) days of the first use of a formaldehyde-containing coating and once per permit term thereafter. An acceptable report of the measured emissions shall be submitted within sixty (60) days of completion of each test.

Upper Permit Limit: 0.15 pounds per hour

Reference Test Method: EPA Method 011 or other method approved by NYSDEC

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-8: Compliance Certification  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaces Condition(s) 51**

**Item 1-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER Emission Point: 09C10

Process: 016

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

**New York State Department of Environmental Conservation**

**Permit ID: 5-5326-00004/00049**

**Facility DEC ID: 5532600004**



**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The hourly emission rate of formaldehyde from combined Paper Machine Nos. 9 & 10 shall not exceed 1.85 lbs/hr (when no formaldehyde is being emitted from Paper Machine No. 8).

For the purpose of ascertaining compliance or noncompliance with this limit, source owner shall perform a stack test of the emission point (EP 09C10) within 60 days of startup of Paper Machine No. 10's "dry-end" scubber (ES 010SC). Otherwise, testing shall be conducted on an annual basis.

Upper Permit Limit: 1.85 pounds per hour

Reference Test Method: NCASI Method 98.01 or other method approved by DEC

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 51: Compliance Certification**

**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Replaced by Condition(s) 1-8**

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER Emission Point: 09C10

Process: 016

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

**Item 51.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The hourly emission rate of formaldehyde from combined



**New York State Department of Environmental Conservation**

**Permit ID: 5-5326-00004/00049**

**Facility DEC ID: 5532600004**

Paper Machine Nos. 9 & 10 shall not exceed 1.85 lbs/hr (when no formaldehyde is being emitted from Paper Machine No. 8).

For the purpose of ascertaining compliance or non-compliance with this limit, source owner shall perform a stack test of the emission point once during the term of this permit and submit an acceptable report of the measured emissions.

Upper Permit Limit: 1.85 pounds per hour

Reference Test Method: EPA Method 011 or other method approved by NYSDEC

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



**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 52: Contaminant List**  
**Effective between the dates of 02/13/2006 and Permit Expiration Date**

**Applicable State Requirement: ECL 19-0301**

**Item 52.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in this

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**Facility DEC ID: 5532600004**



permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000096-23-1  
Name: 1,3-DICHLORO-2-PROPANOL

CAS No: 000050-00-0  
Name: FORMALDEHYDE

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

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

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

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

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