



**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: 02/28/2011 Expiration Date: 02/27/2016  
Mod 1 Effective Date: 02/28/2012 Expiration Date: 02/27/2016

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

Contact: VIRGINIA L KEEFER  
HOLLINGSWORTH & VOSE CO  
5035 CO RTE 113  
GREENWICH, NY 12834  
(518) 695-8175

Facility: HOLLINGSWORTH & VOSE-EASTON MILL  
3235 CO RTE 113  
GREENWICH, NY 12834

**Description:**

Hollingsworth & Vose Company's Easton Facility is a manufacturer of technical industrial papers and other 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 Part 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 and 40 CFR 63, Subpart JJJJ & Subpart OOOO, as



applicable. These limits the quantity of volatile organic compounds (VOC) and Hazardous Air Pollutants (HAPs), respectively, which are 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 applied" for each coating per 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.

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



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
  - Permit modifications, suspensions or revocations by the Department

**Facility Level**

- Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG
- 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 1-1: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6 NYCRR 621.13**

**Item 1-1.1:**

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.

**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 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 1-2: Submission of application for permit modification or renewal-REGION 5**

**SUBOFFICE - WARRENSBURG**

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

**Item 1-2.1:**

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) 622-1281



**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, PO Box 220

Warrensburg, NY 12885-0220

(518) 623-1281

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



**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  
3235 CO RTE 113  
GREENWICH, NY 12834

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

Mod 0 Permit Effective Date: 02/28/2011

Permit Expiration Date: 02/27/2016

Mod 1 Permit Effective Date: 02/28/2012

Permit Expiration Date: 02/27/2016



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 1-1 6 NYCRR 201-6.5 (a) (7): Fees
- 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.
- 1-2 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
- 21 40 CFR Part 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- 25 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*26 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*27 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*28 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 1-3 6 NYCRR 211.1: Air pollution prohibited
- 1-4 6 NYCRR 212.4 (a): Compliance Certification
- 1-5 6 NYCRR 212.4 (a): Compliance Certification
- 30 6 NYCRR 212.4 (a): Compliance Certification
- 31 6 NYCRR 212.4 (a): Compliance Certification
- 33 6 NYCRR 212.6 (a): Compliance Certification
- 34 6 NYCRR 225-1.2 (a) (2): Compliance Certification
- 1-6 6 NYCRR 228-1.7: Compliance Certification
- 36 6 NYCRR 228-1.10: Compliance Certification
- 1-7 40CFR 63.3320(b)(3), Subpart JJJ: Compliance Certification
- 1-8 40CFR 63.3410(a), Subpart JJJ: Compliance Certification
- 39 40CFR 63.6585, Subpart ZZZZ: Compliance Certification

#### Emission Unit Level

- 40 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 41 6 NYCRR Subpart 201-6: Process Definition By Emission Unit



**EU=U-BOILR,EP=00018**

42 6 NYCRR 227-1.3 (a): Compliance Certification

**EU=U-BOILR,EP=00018,Proc=001**

43 6 NYCRR 227-1.3: Compliance Certification  
44 6 NYCRR 227.2 (b) (1): Compliance Certification

**EU=U-BROKE**

45 6 NYCRR 212.4 (a): Compliance Certification

**EU=U-MIXRS**

46 6 NYCRR 212.4 (a): Compliance Certification

**EU=U-MIXRS,EP=009A7**

47 6 NYCRR 212.4 (c): Compliance Certification

**EU=U-PAPER**

48 6 NYCRR 212.4 (a): Compliance Certification  
49 6 NYCRR 212.4 (a): Compliance Certification

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

50 6 NYCRR 212.4 (a): Compliance Certification

**EU=U-PAPER,Proc=017**

1-9 40CFR 63.4291(a)(2), Subpart OOOO: Compliance Certification  
1-10 40CFR 63.4301, Subpart OOOO: General Provisions  
1-11 40CFR 63.4311(a), Subpart OOOO: Compliance Certification  
1-12 40CFR 63.4312, Subpart OOOO: Compliance Certification

**EU=U-PAPER,Proc=0BB,ES=0WET9**

51 6 NYCRR 212.4 (a): Compliance Certification

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

52 6 NYCRR 212.4 (a): Compliance Certification

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

1-13 6 NYCRR 212.4 (a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

54 ECL 19-0301: Contaminant List  
55 6 NYCRR 201-1.4: Unavoidable noncompliance and violations  
1-14 6 NYCRR 211.2: Visible Emissions Limited

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 - 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 02/28/2011 and 02/27/2016**

**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 1-1: Fees**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

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

**Item 1-1.1:**  
The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 2: Fees**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 2.1:**

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

**Condition 3: Recordkeeping and reporting of compliance monitoring  
Effective between the dates of 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 1-2: Compliance Certification  
Effective between the dates of 02/28/2012 and 02/27/2016**

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

**Replaces Condition(s) 5**

**Item 1-2.1:**

The Compliance Certification activity will be performed for the Facility.



**Item 1-2.2:**

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.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**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.

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iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All 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 7/30/2011.  
Subsequent reports are due on the same day each year

**Condition 7: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

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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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**



**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**



**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**

**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 02/28/2011 and 02/27/2016**



**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 title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

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

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

**Condition 19: Required Emissions Tests**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR 202-1.1**

**Item 19.1:**

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

**Condition 21: Accidental release provisions.**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:40 CFR Part 68**

**Item 21.1:**

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

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

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

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

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

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

**Condition 22: Recycling and Emissions Reduction**  
Effective between the dates of 02/28/2011 and 02/27/2016

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 22.1:**

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 23: Emission Unit Definition**  
Effective between the dates of 02/28/2011 and 02/27/2016

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

**Item 23.1(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 23.2(From Mod 0):**

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

Emission Unit: U-BOILER

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 23.3(From Mod 0):**

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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 23.4(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 24: Non Applicable requirements**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 24.1:**

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.

**Condition 25: Facility Permissible Emissions**

**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR Subpart 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:

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

Name: SULFUR DIOXIDE

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

Name: OXIDES OF NITROGEN



**Condition 26: Capping Monitoring Condition**  
Effective between the dates of 02/28/2011 and 02/27/2016

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

**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:

40 CFR 52.21

**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

Monitoring Description:

Facility-wide emissions of SO<sub>2</sub> shall not exceed 169 tons

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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 7/30/2011.

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

**Condition 27: Capping Monitoring Condition**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 27.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the

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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:

6 NYCRR Subpart 227-2  
6 NYCRR Subpart 231-2  
40 CFR 52.21

**Item 27.2:**

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

**Item 27.3:**

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 27.4:**

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 27.5:**

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 27.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5	SULFUR DIOXIDE
CAS No: 0NY210-00-0	OXIDES OF NITROGEN

**Item 27.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

On an annual basis, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emissions caps. This certification shall include the following information for each of the twelve (12) consecutive months of the previous year:

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1. the amount of fuel used (both No. 6 fuel oil and natural gas);
2. SO<sub>2</sub> and NO<sub>x</sub> emissions generated, in pounds/month;
3. the rolling annual total of SO<sub>2</sub> and NO<sub>x</sub> emissions, in tons per year; and
4. the threshold levels to which the annual totals are being compared.

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 12 calendar month(s).

**Condition 28: Capping Monitoring Condition**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 28.1:**

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:

6 NYCRR Subpart 227-2  
6 NYCRR Subpart 231-2  
40 CFR 52.21

**Item 28.2:**

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

**Item 28.3:**

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 28.4:**

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 28.5:**

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 28.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 28.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility-wide emissions of NO<sub>x</sub> shall not exceed 83 tons per year (166,000 lbs/yr) as determined by summing monthly NO<sub>x</sub> emissions during any consecutive 12-month period.

Records shall be maintained on-site which demonstrate compliance with the NO<sub>x</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 NO<sub>x</sub> emissions according to the following formulas for the specific fuel burned:

Natural Gas:

$$\text{NO}_x \text{ (lbs/month)} = 0.0001 \text{ lbs/std. cu. ft.} \times \text{NG}$$

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

No. 6 Fuel Oil:

$$\text{NO}_x \text{ (lbs/month)} = 5\text{E-}7 \text{ lbs/BTU} \times 153,300 \text{ BTU/gal} \times \text{FO}$$

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

Parameter Monitored: OXIDES OF NITROGEN



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total of 1.85 lbs. or less, with no more than 0.15 lbs. of the total contributed by Paper Machine No. 8. These limits apply at all times including periods of R & D activities.

The formulations being 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 these hourly emission limits are not exceeded. This record shall include acceptable calculations of the formaldehyde emission rates from Paper Machine No. 8 alone and the overall total from the emission unit for each hour that the facility is operating. Each hourly emission rate must meet the applicable limit as stated above.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 1.85 pounds per hour

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

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

**Condition 1-5: Compliance Certification**

**Effective between the dates of 02/28/2012 and 02/27/2016**

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

**Replaces Condition(s) 29**

**Item 1-5.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER

Process: 016

Emission Source: DRY10

Emission Unit: U-PAPER

Process: 017

Emission Source: 0DRY9

Emission Unit: U-PAPER

Process: AAA

Emission Source: 00PM8

Regulated Contaminant(s):

CAS No: 000050-00-0

FORMALDEHYDE

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL



DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

Source owner or operator 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.

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.

The initial report is due 7/30/2012.

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

**Condition 30: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 30.1:**

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 30.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner or operator shall limit annual emissions of

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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.

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.

The initial report is due 7/30/2011.

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

**Condition 31: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 31.1:**

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 31.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner or operator shall limit hourly emission rate of formaldehyde from Paper Machine Nos. 8, 9 & 10 to a total of 1.85 lbs. or less, with no more than 0.15 lbs. of the total contributed by Paper Machine No. 8. These



limits apply at all times including periods of R & D activities.

The formulations being 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 these hourly emission limits are not exceeded. This record shall include acceptable calculations of the formaldehyde emission rates from Paper Machine No. 8 alone and the overall total from the emission unit for each hour that the facility is operating. Each hourly emission rate must meet the applicable limit as stated above.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 0.15 pounds per hour

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 33: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement: 6 NYCRR 212.6 (a)**

**Item 33.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-BROKE

Emission Unit: U-MIXRS

Emission Unit: U-PAPER

**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 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.



The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

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

This monitoring activity also serves to demonstrate compliance or noncompliance with opacity requirements for coating lines specified in 6NYCRR 228.4.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent  
Reference Test Method: Method 9  
Monitoring Frequency: DAILY  
Averaging Method: 6 MINUTE AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (a) (2)**

**Item 34.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 34.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person will sell, offer for sale, purchase or use any residual oil fuel which contains sulfur in a quantity exceeding the following limitation.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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 7/30/2011.

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

**Condition 1-6: Compliance Certification**

**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR 228-1.7**

**Replaces Condition(s) 35**

**Item 1-6.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER

Process: 016

Emission Unit: U-PAPER

Process: 017

Emission Unit: U-PAPER

Process: AAA

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The maximum pounds of volatile organic compounds (VOCs) per gallon (minus water and excluded VOC) at paper coating



lines shall not exceed 2.9 lbs/gal at application.

Certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of the as applied coating, for each coating used at the facility, must be maintained and, upon request, be provided to the Department's representative. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained and, upon request, be submitted to the Department. Records must be maintained at the facility for a period of five years.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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 7/30/2012.

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

**Condition 36: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR 228-1.10**

**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of this facility subject to 6NYCRR Part 228 must:

(a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;

(b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;



(c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;

(d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents.

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

All associated coating line work area(s) within the facility shall be inspected daily to determine if there are any open containers present, and that only acceptable spray gun cleaning methods were utilized. A log book shall be maintained to record these inspections and their results. The log book shall include the following information:

- date and time of inspection
- items or areas observed
- corrective measures taken, if necessary

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 1-7: Compliance Certification**

**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:40CFR 63.3320(b)(3), Subpart JJJJ**

**Replaces Condition(s) 37**

**Item 1-7.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER

Process: 016

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Emission Unit: U-PAPER  
Process: AAA

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The owner or operator of an affected source must limit the organic HAP emissions to no more than 0.20 kg of organic HAP per kg of solids applied at existing affected sources (.08kg for new affected sources) for each month.

To demonstrate compliance with this limit using "as-applied" compliant coatings, the owner or operator shall follow procedures specified in § 63.3370(a)(2)(ii). The owner or operator shall perform all of the following:

-Determine the organic HAP weight-fraction of each coating material "as-purchased" by following § 63.3360(c)(1)-(3).

-Determine the organic HAP weight-fraction of each coating material "as-applied" by following § 63.3370(c)(1)-(ii).

-Determine the solids content of each "as-purchased" coating material by following § 63.3360(d)(1)-(2).

-Calculate the solids content of "as-applied" materials by using Equation 2 in § 63.3370(c)(2)(i).

-Calculate the solids content of "as-applied" organic HAP to solids ratio using Equation 3 in § 63.3370(c)(2)(ii).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

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Upper Permit Limit: .20 kilograms organic HAP per  
kilogram solids applied  
Monitoring Frequency: MONTHLY  
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-8: Compliance Certification**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:40CFR 63.3410(a), Subpart JJJJ**

**Replaces Condition(s) 38**

**Item 1-8.1:**

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

Emission Unit: U-PAPER  
Process: 016

Emission Unit: U-PAPER  
Process: AAA

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source subject to  
this subpart must maintain the following records on a  
monthly basis in accordance with the requirements of §  
63.10(b)(1).

-Organic HAP content data for the purpose of demonstrating  
compliance in accordance with the requirements of §  
63.3360(c)

-Volatile matter and coating solids content data for the  
purpose of demonstrating compliance in  
accordance with the requirements of §  
63.3360(d)

-Material usage, organic HAP usage, volatile matter usage,  
and coating solids usage and compliance  
demonstrations using these data in accordance with the  
requirements of § 63.3370(b), (c), and (d).

Monitoring Frequency: MONTHLY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 7/30/2012.  
Subsequent reports are due every 6 calendar month(s).

**Condition 39: Compliance Certification**  
Effective between the dates of 02/28/2011 and 02/27/2016

**Applicable Federal Requirement:40CFR 63.6585, Subpart ZZZZ**

**Item 39.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

You are subject to this subpart (40 CFR 63, Subpart ZZZZ)  
if you own or operate a stationary RICE at a major or area  
source of HAP emissions, except if the stationary RICE is  
being tested at a stationary RICE test cell/stand.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 40: Emission Point Definition By Emission Unit**  
Effective between the dates of 02/28/2011 and 02/27/2016

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

**Item 40.1(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

NYTMN (km.): 4774.498 NYTME (km.): 616.392 Building: EASTON MIL

**Item 40.2(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

NYTMN (km.): 4774.576 NYTME (km.): 616.473 Building: BOILERHOUS



**Item 40.3(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.): 4774.546 NYTME (km.): 616.459 Building: EASTON MIL

Emission Point: 00025  
Height (ft.): 14 Diameter (in.): 16  
NYTMN (km.): 4774.547 NYTME (km.): 616.45 Building: EASTON MIL

**Item 40.4(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.): 4774.51 NYTME (km.): 616.396 Building: EASTON MIL

**Item 40.5(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.): 4774.432 NYTME (km.): 616.36 Building: NO. 14

Emission Point: 008A2  
Height (ft.): 39 Diameter (in.): 49  
NYTMN (km.): 4774.428 NYTME (km.): 616.356 Building: NO. 14

Emission Point: 008A3  
Height (ft.): 39 Diameter (in.): 49  
NYTMN (km.): 4774.423 NYTME (km.): 616.352 Building: NO. 14

Emission Point: 008A4  
Height (ft.): 39 Diameter (in.): 49  
NYTMN (km.): 4774.416 NYTME (km.): 616.347 Building: EASTON MIL

Emission Point: 008A5  
Height (ft.): 39 Diameter (in.): 49  
NYTMN (km.): 4774.411 NYTME (km.): 616.342 Building: EASTON MIL

Emission Point: 008A6  
Height (ft.): 39 Diameter (in.): 49  
NYTMN (km.): 4774.405 NYTME (km.): 616.338 Building: EASTON MIL

Emission Point: 009A1

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Height (ft.): 37	Diameter (in.): 24	
NYTMN (km.): 4774.516	NYTME (km.): 616.42	Building: EASTON MIL
Emission Point: 009A2		
Height (ft.): 37	Diameter (in.): 24	
NYTMN (km.): 4774.51	NYTME (km.): 616.415	Building: EASTON MIL
Emission Point: 009A3		
Height (ft.): 37	Diameter (in.): 24	
NYTMN (km.): 4774.505	NYTME (km.): 616.41	Building: EASTON MIL
Emission Point: 010A1		
Height (ft.): 36	Length (in.): 22	Width (in.): 33
NYTMN (km.): 4774.533	NYTME (km.): 616.402	Building: EASTON MIL
Emission Point: 010A2		
Height (ft.): 36	Length (in.): 22	Width (in.): 33
NYTMN (km.): 4774.525	NYTME (km.): 616.394	Building: EASTON MIL
Emission Point: 010A3		
Height (ft.): 31	Length (in.): 18	Width (in.): 18
NYTMN (km.): 4774.519	NYTME (km.): 616.397	Building: EASTON MIL

**Condition 41: Process Definition By Emission Unit**  
Effective between the dates of 02/28/2011 and 02/27/2016

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

**Item 41.1(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 on the formulation being used. 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 Machine No. 10's "dry-end" (DRY10) are vented to wet scrubber (010CS) and exhausted through emission point 09C10.

This web coating line is subject to 40 CFR 63, Subpart JJJ, when applying organic HAP containing coatings.

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

Emission Source/Control: DRY10 - Process

**Item 41.2(From Mod 1):**



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

Emission Unit: U-PAPER

Process: 017

Source Classification Code: 4-02-013-01

Process Description:

This process includes web coating operations that coat both paper and non-woven substrate (greater than 10% by mass). This web coating line is subject to 40 CFR 63, Subpart OOOO, when applying organic HAP containing coatings.

Various coatings/binders may be applied to the web at different points, depending on the machine and the formulation being used. 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.

Emission Source/Control: 0DRY9 - Process

Emission Source/Control: 0WET9 - Process

**Item 41.3(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.

This web coating line is subject to 40 CFR 63, Subpart JJJJ, when applying organic HAP containing coatings.

Emission Source/Control: 00PM8 - Process

**Item 41.4(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 41.5(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 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 41.6(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 41.7(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 41.8(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 41.9(From Mod 0):**



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

Emission Unit: U-PAPER  
Process: 0AA 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 41.10(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 41.11(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 42: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 42.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILR Emission Point: 00018

**Item 42.2:**

Compliance Certification shall include the following monitoring:

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



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

Monitoring Description:

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

The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation. In addition, Method 9 opacity evaluations must be conducted in accordance with daily visible emissions verification described in this permit.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 43: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable Federal Requirement:6 NYCRR 227-1.3**

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILR

Emission Point: 00018

Process: 001

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of oil-fired boilers which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack for each boiler which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours



except during adverse weather conditions (fog, rain, or snow).

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:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Incident weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) 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 opacity standard 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: DAILY  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 6 calendar month(s).

**Condition 44: Compliance Certification**



Effective between the dates of 02/28/2011 and 02/27/2016

Applicable Federal Requirement:6 NYCRR 227.2 (b) (1)

**Item 44.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILR Emission Point: 00018  
Process: 001

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:

Particulate emission limit for a stationary combustion installation firing oil. The owner or operator shall complete the following once per term of this permit:

- 1) submit, to the Department, an acceptable protocol for the testing of particulate emission limit cited in this condition,
- 2) perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition, and
- 3) all records shall be maintained at the facility for a minimum of five years.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 60 days after the reporting period.

The initial report is due 8/29/2011.

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

**Condition 45: Compliance Certification**

Effective between the dates of 02/28/2011 and 02/27/2016

Applicable Federal Requirement:6 NYCRR 212.4 (a)

**Item 45.1:**

The Compliance Certification activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



Emission Unit: U-BROKE

**Item 45.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 46: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 46.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-MIXRS

**Item 46.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 47: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-MIXRS

Emission Point: 009A7



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

**Item 47.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The source owner or operator will conduct compliance verifications at the monitoring frequency stated below. These verifications include review of pertinent information relating to particulate emissions of the source, including but not limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that during source operation all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure compliance with the particulate emission rate.

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: PARTICULATES  
Upper Permit Limit: 0.050 grains per dscf  
Reference Test Method: USEPA METHOD 5  
Monitoring Frequency: SEMI-ANNUALLY

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



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 7/30/2011.

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

**Condition 48: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 48.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

**Item 48.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2011.

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

**Condition 49: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Regulated Contaminant(s):

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

**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 or operator shall limit annual emissions of

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



1,3-dichloro-2-propanol from all sources to no more than 3,720 lbs. during any consecutive twelve (12) months, rolled monthly.

Records shall include, for each month, raw material consumption and acceptable calculations of the total pounds of 1,3-dichloro-2-propanol emitted for that month, as well as the total amounts emitted for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the allowable limit noted above.

Parameter Monitored: 1,3-DICHLORO-2-PROPANOL

Upper Permit Limit: 3720 pounds 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 7/30/2011.

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

**Condition 50: Compliance Certification**

**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: 016

Emission Source: 010SC

**Item 50.2:**

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, based on a 1-hour average, when running formulations containing formaldehyde.

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

Parameter Monitored: FLOW RATE

Lower Permit Limit: 120 gallons per minute

Monitoring Frequency: CONTINUOUS

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Averaging Method: 1-HOUR AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-9: Compliance Certification**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:40CFR 63.4291(a)(2), Subpart OOOO**

**Item 1-9.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER  
Process: 017

**Item 1-9.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

The source owner or operator of existing coating operations shall limit organic HAP emissions to the atmosphere to no more than 0.12 kg of organic HAP per kg of solids applied. The source owner or operator must include all regulated materials (as defined in §63.4371) used in the affected source when determining the organic HAP emission rate.

A source owner or operator demonstrating compliance with this emission rate using the “without add-on controls option” shall demonstrate that, based on the regulated materials applied in the web coating operation(s), the organic HAP emission rate for the web coating operation(s) is less than or equal to the applicable emission limit, calculated as a rolling 12-month average emission rate. Source owner or operator must meet all the requirements of §§63.4330, 63.4331, and 63.4332 to demonstrate compliance with the applicable emission limit using this option

To demonstrate compliance with this emission rate using the “without add-on control option,” the source owner or operator shall follow procedures specified in § 63.4331(a):

(1) Determine the mass fraction of organic HAP for each material. Determine the mass fraction of organic HAP for each coating, thinning, and cleaning material applied during the compliance period according to the requirements in § 63.4321(e)(1).



(2) Determine the mass fraction of solids for each material. Determine the mass fraction of solids (kg of solids per kg of coating or printing material) for each coating material applied during the compliance period according to the requirements in § 63.4321(e)(2).

(3) Determine the mass of each material. Determine the mass (kg) of each coating, thinning, or cleaning material applied during the compliance period by measurement or usage records.

(4) Calculate the mass of organic HAP emissions. The mass of organic HAP emissions is the combined mass of organic HAP contained in all coating, thinning, and cleaning materials applied during the compliance period minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equations 1, 1A, and 1B of this section.

(5) Calculate the total mass of coating solids. Determine the total mass of coating solids applied, kg, which is the combined mass of the solids contained in all the coating and printing materials applied during the compliance period, using Equation 2 of this section.

(6) Calculate the organic HAP emission rate for the compliance period, kg organic HAP emitted per kg solids used, using Equation 3 of this section.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: .12 kilograms organic HAP per kilogram solids applied

Monitoring Frequency: MONTHLY

Averaging Method: 12-month rolling average

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

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

**Condition 1-10: General Provisions**

**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement: 40CFR 63.4301, Subpart OOOO**

**Item 1-10.1:**

This Condition applies to Emission Unit: U-PAPER  
Process: 017

**Item 1-10.2:**



Table 3 of subpart OOOO lists which parts of the general provisions in §63.1-63.15 apply to the facility.

**Condition 1-11: Compliance Certification**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:40CFR 63.4311(a), Subpart OOOO**

**Item 1-11.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER  
Process: 017

**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Semiannual compliance reports for each affected sources using the “without add-on controls option” must submit information specified under § 63.4311 including the following:

- (i) Company name and address.
- (ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- (iii) Date of report and beginning and ending dates of the reporting period.
- (iv) Identification of the compliance option or options specified in §63.4291 that source owner or operator used on each web coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.
- (v) If you used the emission rate without add-on controls the calculation results for each compliance period ending each month during the 6-month reporting period.
- (vi) If there were no deviations from the emission limitations in Table 1 to this subpart that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable limit in Table 1 of



this subpart.

If there were deviations from the applicable emission limit in Table 1 to this subpart, and you use the emission rate without add-on controls option, the semiannual compliance report must contain the following additional information:

(i) The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit in Table 1 to this subpart.

(ii) The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A and 1B, 2, and 3 in §63.4331 for web coating operations. You do not need to submit background data supporting these calculations ( e.g., information provided by materials suppliers or manufacturers, or test reports).

(iii) A statement of the cause of each deviation.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2012.

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

**Condition 1-12: Compliance Certification**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable Federal Requirement:40CFR 63.4312, Subpart OOOO**

**Item 1-12.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: 017

**Item 1-12.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator for each affected sources using the “without add-on controls option” must collect



and keep a records of the following data and information. Failure to collect and keep these records is a deviation from the applicable standard.

(a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.

(b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data or test data used to determine the mass fraction of organic HAP for coating, thinning, and cleaning materials; and the mass fraction of solids for coating materials. If you conducted testing to determine mass fraction of organic HAP of coating materials or the mass fraction of solids of coating materials, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.

(c) For each compliance period, the records specified in paragraph (c)(1) of this section for web coating operations.

(1) A record of the web coating operations on which you used each compliance option and the time periods (beginning and ending dates) you used each option. For each month, a record of all required calculations for the compliance option(s) you used.

For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coating, thinning and cleaning materials applied each compliance period using Equations 1, 1A, and 1B of § 63.4331 and, if applicable, the calculation used to determine the mass of organic HAP in waste materials according to § 63.4331(a)(4)(iii); the calculation of the total mass of the solids contained in all coating materials applied each compliance period using Equation 2 of § 63.4331; and the calculation of the organic HAP emission rate for each compliance period using Equation 3 of § 63.4331.

(d) A record of the name and mass of each regulated material applied in the web coating and printing subcategory during each compliance period.

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(e) A record of the mass fraction of organic HAP for each regulated material applied during each compliance period.

(f) A record of the mass fraction of coating and printing solids for each coating and printing material applied during each compliance period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 0 days after the reporting period.

The initial report is due 6/30/2012.

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

**Condition 51: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: 0BB

Emission Source: 0WET9

Regulated Contaminant(s):

CAS No: 000096-23-1

1,3-DICHLORO-2-PROPANOL

**Item 51.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Source owner or operator shall limit annual emissions of 1,3-dichloro-2-propanol from Paper Machine No. 9 sources to no more than 1,230 lbs. during any consecutive twelve (12) months, rolled monthly.

Records shall include, for each month, raw material consumption and acceptable calculations of the pounds of 1,3-dichloro-2-propanol emitted for that month, as well as the total pounds emitted for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the allowable limit noted above.

Parameter Monitored: 1,3-DICHLORO-2-PROPANOL

Upper Permit Limit: 1230 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

**New York State Department of Environmental Conservation**

Permit ID: 5-5326-00004/00049

Facility DEC ID: 5532600004



Reports due 30 days after the reporting period.  
The initial report is due 7/30/2011.  
Subsequent reports are due every 6 calendar month(s).

**Condition 52: Compliance Certification**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 52.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER  
Process: AAA

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

**Item 52.2:**

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 or operator 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 initial use of formaldehyde-containing coatings and once per permit term of the worst-case coating 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 1-13: Compliance Certification**  
**Effective between the dates of 02/28/2012 and 02/27/2016**



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

**Replaces Condition(s) 53**

**Item 1-13.1:**

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER Emission Point: 09C10

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

**Item 1-13.2:**

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 or operator shall perform a stack test of emission point (EP 09C10), as approved by the Department, 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: ANNUALLY

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 54: Contaminant List**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

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

**Item 54.1:**

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

CAS No: 000050-00-0  
Name: FORMALDEHYDE



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

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

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

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

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

**Condition 55: Unavoidable noncompliance and violations**  
**Effective between the dates of 02/28/2011 and 02/27/2016**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 55.1:**

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 1-14: Visible Emissions Limited**  
**Effective between the dates of 02/28/2012 and 02/27/2016**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 1-14.1:**

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.

