



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-5330-00015/00029  
Mod 0 Effective Date: 01/05/2008 Expiration Date: No expiration date.  
Mod 1 Effective Date: 07/31/2009 Expiration Date: No expiration date.

Permit Issued To: IRVING TISSUE INC  
300 UNION ST  
SAINT JOHN, NB E2L-4Z2

Contact: THOMAS NASH  
IRVING TISSUE INC  
1 EDDY ST PO BOX 17  
FORT EDWARD, NY 12828-0017  
(518) 747-4151

Facility: IRVING TISSUE INC FT EDWARD OPERATIONS  
1 EDDY ST  
FORT EDWARD, NY 12828

Description:  
The Irving Tissue Fort Edward facility is a paper manufacturing facility. Principal facility components include boilers used to generate process steam and provide comfort heating, a pulp preparation process, paper machines, winders, rewinders and related converting equipment. The paper machines constitute continuous web operations. Virgin and recycled fiber is formed into continuous sheet products by the paper machines and then dried to form the product. The product may be further processed by the rewinders before being sent to converting areas where various consumer products such as facial tissue, bath tissue, paper napkins and paper towels are produced.

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

Permit Administrator: MARC S MIGLIORE  
NYSDEC  
232 GOLF COURSE RD PO BOX 220  
WARRENSBURG, NY 12885-0220

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



### Notification of Other State Permittee Obligations

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

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the 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



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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6NYCRR 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 prior to actual transfer of ownership.

**Condition 1-1: Permit modifications, suspensions or revocations by the**



**Applicable State Requirement: 6NYCRR 621.13**

**Item 1-1.1:**

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

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

**Condition 4: Permit modifications, suspensions or revocations by the Department**

**Applicable State Requirement: 6NYCRR 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 5: Submission of application for permit modification or renewal-REGION 5**

**SUBOFFICE - WARRENSBURG**

**Applicable State Requirement: 6NYCRR 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



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: IRVING TISSUE INC  
300 UNION ST  
SAINT JOHN, NB E2L-4Z2

Facility: IRVING TISSUE INC FT EDWARD OPERATIONS  
1 EDDY ST  
FORT EDWARD, NY 12828

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

Mod 0 Permit Effective Date: 01/05/2008  
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 07/31/2009  
date.

Permit Expiration Date: No expiration



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6NYCRR 201-7.2: Facility Permissible Emissions
- \*1-1 6NYCRR 201-7.2: Capping Monitoring Condition
- \*2 6NYCRR 201-7.2: Capping Monitoring Condition
- 5 6NYCRR 234.3(a)(1): Compliance Demonstration
- 6 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Demonstration

#### Emission Unit Level

##### EU=B-00001

- 7 6NYCRR 227-1.3(a): Compliance Demonstration
- 8 40CFR 60.42c(d), NSPS Subpart Dc: Compliance Demonstration
- 9 40CFR 60.48c(c), NSPS Subpart Dc: Compliance Demonstration
- 10 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration

##### EU=B-00001,Proc=00B

- 11 40CFR 60.48c(e)(11), NSPS Subpart Dc: Compliance Demonstration

##### EU=B-00001,Proc=00C

- 12 40CFR 60.44c(g), NSPS Subpart Dc: Compliance Demonstration

##### EU=B-00001,Proc=00C,ES=00030

- 1-2 6NYCRR 227.2(b)(1): Compliance Demonstration
- 14 40CFR 60.47c(f), NSPS Subpart Dc: Emission monitoring for particulate matter

##### EU=P-00001

- 1-3 6NYCRR 212.4(c): Compliance Demonstration
- 15 6NYCRR 212.6(a): Compliance Demonstration

##### EU=P-00001,Proc=103

- 17 6NYCRR 234.6: Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 19 ECL 19-0301: Contaminant List
- 1-4 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 21 6NYCRR 201-5: Emission Unit Definition
- 1-5 6NYCRR 211.2: Air pollution prohibited

#### Emission Unit Level

- 23 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 24 6NYCRR 201-5: Process Definition By Emission Unit

##### EU=B-00001

- 25 6NYCRR 225-1.2(a)(2): Compliance Demonstration

NOTE: \* preceding the condition number indicates capping.



**FEDERALLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

**Item A: Sealing - 6NYCRR Part 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

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

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

**Item C: Maintenance of Equipment - 6NYCRR Part 200.7**

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



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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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



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

**Item K: Visible Emissions Limited - 6 NYCRR Part 211.3**

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

**Item L: Open Fires - 6 NYCRR Part 215**

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

**Item M: Permit Exclusion - ECL 19-0305**

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

**Item N: Federally Enforceable Requirements - 40 CFR 70.6(b)**

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**FEDERAL APPLICABLE REQUIREMENTS**



**The following conditions are federally enforceable.**

**Condition 1: Facility Permissible Emissions**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-7.2**

**Item 1.1:**

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

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

per year CAS No: 007446-09-5 (From Mod 1) PTE: 198,000 pounds

Name: SULFUR DIOXIDE

per year CAS No: 0NY210-00-0 (From Mod 1) PTE: 198,000 pounds

Name: OXIDES OF NITROGEN

**Condition 1-1: Capping Monitoring Condition**  
**Effective between the dates of 07/31/2009 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-7.2**

**Item 1-1.1:**

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

6NYCRR 201-6.1(a)

6NYCRR 227-2

**Item 1-1.2:**

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

**Item 1-1.3:**

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

**Item 1-1.4:**

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



period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 1-1.5:**

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

**Item 1-1.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 1-1.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility-wide emissions of nitrogen oxides (NOX) shall not exceed 99 tons per year (198,000 lbs per year) as determined by summing monthly NOx emissions during any consecutive 12 month period. Records shall be maintained on site which demonstrate compliance with the NOX cap. These records shall include the mass emissions over each rolling 12 month period. Calculations are based on the following formula:

(Thousands of gallons of residual oil burned) times (75 pounds per thousand gallons) plus (thousands of gallons of distillate oil burned) times (20 pounds per thousand gallons) plus (million cubic feet of natural gas burned in boilers) times (100 pounds per million cubic feet) plus (million cubic feet of natural gas burned in paper machine dryers) times (29 pounds per million cubic feet) plus 12,000 pounds for exempt sources = total pounds of NOX emitted. This total is divided by 2000 to convert to tons.

Emission factors will be revised if the most recent stack test shows higher emissions.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2010.

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

**Condition 2: Capping Monitoring Condition**

**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 201-7.2**



**Item 2.1:**

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

6NYCRR 201-6.1(a)

**Item 2.2:**

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

**Item 2.3:**

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

**Item 2.4:**

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

**Item 2.5:**

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

**Item 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility-wide emissions of sulfur dioxide (SO<sub>2</sub>) shall not exceed 99 tons per year (198,000 lbs per year) 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> cap. These records shall include the mass emissions over each rolling 12 month period. Calculations are based on the following formula:





- verifies the composition of the ink solvent/volatiles, if supported by actual batch records,
2. Purchase, usage, and/or production records of the inks, VOCs and solvents.
  3. Any other parameters used to verify compliance.

Upon request by DEC, the permittee shall perform Method 24A analyses (or supply samples to DEC for analysis) to verify the VOC content and volatile fraction of the inks. When there is any discrepancy between the calculated formulation and the Method 24A results, the Method 24A results shall be used for compliance purposes.

Compliance is determined by using the formulas found in 6NYCRR §234.3(a)(1).

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: INK  
Parameter Monitored: VOC CONTENT  
Upper Permit Limit: 25 percent by volume  
Reference Test Method: method 24  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 6.1:**  
The Compliance Demonstration activity will be performed for the Facility.

**Item 6.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The owner or operator of each affected facility shall submit notification of the date of construction and actual startup, as provided by 40CFR 60.7. The notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



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

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity.

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 must be conducted during daylight hours except during adverse 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?

Inclement weather conditions shall be recorded for those days when observations were prohibited. This logbook must be retained at the facility for five 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 (six minute average) of the affected emission point must be conducted within two 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 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 the 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: UPON REQUEST BY REGULATORY AGENCY

**Condition 8: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Using the alternative compliance method, no owner or operator shall combust oil containing greater than 0.5 percent sulfur content in an affected facility. Distillate oil compliance will be determined by supplier certification. Residual oil compliance will be determined by fuel sampling.

Process Material: FUEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 0.5 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING



DESCRIPTION  
Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2008.  
Subsequent reports are due every 6 calendar month(s).

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

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

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The owner or operator of each coal-fired, residual oil-fired, or wood-fired affected facility subject to the opacity limits under §60.43c(c) shall submit excess emission reports, to the Administrator, semiannually. All reports shall be postmarked by the 30th day following the end of each semiannual reporting period.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 7/30/2008.  
Subsequent reports are due every 6 calendar month(s).

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:



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

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

Process: 00B

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility burning distillate oil may use fuel supplier certifications to demonstrate compliance with sulfur content requirements. Fuel supplier certification shall include the name of the oil supplier; a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40CFR60 41(c); and the sulfur content of the oil.

In addition to records of fuel supplier certifications, the semi annual report to the Administer shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

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 7/30/2008.

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

**Condition 12: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.44c(g), NSPS Subpart Dc**





Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate limit for stationary combustion installation firing oil. The owner or operator shall complete the following within 60 days of firing residual oil:

- (1) Submit to the Department an acceptable protocol for the testing of particulate emissions cited in this condition;
- (2) perform a stack test, based on the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 14:**     **Emission monitoring for particulate matter**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable Federal Requirement:40CFR 60.47c(f), NSPS Subpart Dc**

**Item 14.1:**

This Condition applies to   Emission Unit: B-00001

Process: 00C

Emission Source: 00030

**Item 14.2:**

An affected facility that burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur and operates according to a written site-specific monitoring plan approved by the appropriate delegated permitting authority is not required to operate a COMS for measuring opacity. This monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard

**Condition 1-3:**     **Compliance Demonstration**  
**Effective between the dates of 07/31/2009 and Permit Expiration Date**

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

**Item 1-3.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00001

Regulated Contaminant(s):



CAS No: 0NY075-00-0 PARTICULATES

**Item 1-3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates shall not exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry basis, from any emission source in this emission unit. Emission testing will be required at the Department's discretion.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00001

**Item 15.2:**

Compliance Demonstration 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 to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period from any process emission source , except only the emission of uncombined water.

The Department reserves the right to perform or require the performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST



METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 17: Compliance Demonstration**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable Federal Requirement:6NYCRR 234.6**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-00001

Process: 103

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The following work practices are prohibited:

- (a) using open containers to store or dispose of cloth or paper impregnated with VOC and /or solvents that are used for surface preparation, cleanup or ink/coating removal;
- (2) storage in open containers of spent or fresh VOC and /or solvents to be used for surface preparation, cleanup or ink/coating removal;
- (3) use of open containers to store or dispose of inks and/or surface coatings; or
- (4) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

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

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

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

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

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

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**



**Condition 19: Contaminant List**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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

**Item 19.1:**

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

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

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

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

**Condition 1-4: Unavoidable noncompliance and violations**  
**Effective between the dates of 07/31/2009 and Permit Expiration Date**

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

**Item 1-4.1:**

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 21: Emission Unit Definition**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 21.1(From Mod 1):**

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

Emission Unit: B-00001

Emission Unit Description:

Combustion sources including two (2) 14.9 mmBtu/hr dual fired boilers (natural gas & #2 oil), two (2) 21.4 mmBtu/hr tri-fuel boilers (gas, #2 & #4 oil) and one (1) 90.7 mmBtu/hr tri-fuel boiler. These boilers will provide steam for process and space heating requirements. These boilers are subject to the requirements of 40CFR60 Subpart Dc.

Building(s): 15

**Item 21.2(From Mod 1):**

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

Emission Unit: P-00001

Emission Unit Description:

This emission unit provides a common grouping of all process equipment used for manufacturing tissue paper. Individual emission sources include paper machines, rewinders, converting equipment and various insignificant, exempt, and trivial sources, such as pulpers, chemical storage tanks, process water treatment operations, packaging and shipping operations, and maintenance activities.

Building(s): 1



2  
25  
26  
3  
4  
42  
45  
46  
47  
48  
5  
6  
BALE  
TAD

**Condition 1-5: Air pollution prohibited**  
**Effective between the dates of 07/31/2009 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 211.2**

**Item 1-5.1:**

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

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

**Condition 23: Emission Point Definition By Emission Unit**  
**Effective between the dates of 01/05/2008 and Permit Expiration Date**

**Applicable State Requirement:6NYCRR 201-5**

**Item 23.1(From Mod 1):**

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

Emission Unit: B-00001

Emission Point: 00030  
Height (ft.): 100                      Diameter (in.): 48

Emission Point: STUB1  
Height (ft.): 25                      Diameter (in.): 24

Emission Point: STUB2  
Height (ft.): 25                      Diameter (in.): 24

Emission Point: STUB3  
Height (ft.): 25                      Diameter (in.): 24





**Item 24.1(From Mod 1):**

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

Emission Unit: B-00001  
Process: 00A  
Process Description: Burning natural gas in any of the steam boilers.

Emission Source/Control: 00030 - Combustion  
Design Capacity: 90.7 million Btu per hour

Emission Source/Control: 0003A - Combustion  
Design Capacity: 14.9 million Btu per hour

Emission Source/Control: 0003B - Combustion  
Design Capacity: 14.9 million Btu per hour

Emission Source/Control: 0003C - Combustion  
Design Capacity: 21.4 million Btu per hour

Emission Source/Control: 0003D - Combustion  
Design Capacity: 21.4 million Btu per hour

**Item 24.2(From Mod 1):**

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

Emission Unit: B-00001  
Process: 00B  
Process Description:  
Burning distillate oil in any of the steam boilers.

Emission Source/Control: 00030 - Combustion  
Design Capacity: 90.7 million Btu per hour

Emission Source/Control: 0003A - Combustion  
Design Capacity: 14.9 million Btu per hour

Emission Source/Control: 0003B - Combustion  
Design Capacity: 14.9 million Btu per hour

Emission Source/Control: 0003C - Combustion  
Design Capacity: 21.4 million Btu per hour

Emission Source/Control: 0003D - Combustion  
Design Capacity: 21.4 million Btu per hour

**Item 24.3(From Mod 1):**

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

Emission Unit: B-00001  
Process: 00C  
Process Description: Burning residual oil in any of the steam boilers.



Emission Source/Control: 00030 - Combustion  
Design Capacity: 90.7 million Btu per hour

Emission Source/Control: 0003C - Combustion  
Design Capacity: 21.4 million Btu per hour

Emission Source/Control: 0003D - Combustion  
Design Capacity: 21.4 million Btu per hour

**Item 24.4(From Mod 1):**

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

Emission Unit: P-00001  
Process: 101 Source Classification Code: 3-07-013-99  
Process Description:  
This process represents the tissue paper manufacturing process, which includes the paper machines and rewinders.

Emission Source/Control: 021WS - Control  
Control Type: VENTURI SCRUBBER

Emission Source/Control: 00006 - Process

Emission Source/Control: 00017 - Process

Emission Source/Control: 00021 - Process

**Item 24.5(From Mod 1):**

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

Emission Unit: P-00001  
Process: 102 Source Classification Code: 3-07-900-03  
Process Description:  
This process represents the natural gas fired process equipment that is used to dry the paper product on Paper Machine #3 and TAD Paper Machine.

Emission Source/Control: 0008C - Process

Emission Source/Control: 0024C - Process  
Design Capacity: 50 million BTUs per hour

Emission Source/Control: 0025C - Process  
Design Capacity: 25 million BTUs per hour

**Item 24.6(From Mod 1):**

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

Emission Unit: P-00001  
Process: 103 Source Classification Code: 3-07-013-99  
Process Description:  
This process represents the tissue paper converting process.



Emission Source/Control: 014WS - Control      Removal Date: 01/01/2008  
Control Type: WET DUST COLLECTOR

Emission Source/Control: 019WS - Control  
Control Type: WET DUST COLLECTOR

Emission Source/Control: 020WS - Control  
Control Type: WET DUST COLLECTOR

Emission Source/Control: 00011 - Process

Emission Source/Control: 00014 - Process

Emission Source/Control: 00015 - Process

Emission Source/Control: 00016 - Process

Emission Source/Control: 00019 - Process

Emission Source/Control: 00020 - Process

Emission Source/Control: 00022 - Process

**Item 24.7(From Mod 1):**

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

Emission Unit: P-00001

Process: 105

Source Classification Code: 3-07-013-99

Process Description:

This process is a tissue water recovery system, where water used in the TAD paper machine is treated in a dissolved air floatation (DAF) system and returned to the process.

Emission Source/Control: 00026 - Process

**Item 24.8(From Mod 1):**

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

Emission Unit: P-00001

Process: 106

Source Classification Code: 3-07-013-99

Process Description:

In this process, pulp is processed and broken down in a broke pulper.

Emission Source/Control: 00023 - Process

**Condition 25: Compliance Demonstration**

**Effective between the dates of 01/05/2008 and Permit Expiration Date**

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



**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: B-00001

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall use, purchase, sell or offer for sale  
distillate or residual fuel oil which has a sulfur content  
greater than 1.5% by weight. A log of the sulfur content  
in oil per delivery must be maintained on site for a  
minimum of 5 years.

This applies to facilities that are not subject to 40 CFR  
60 Subpart Dc.

Process Material: FUEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

New York State Department of Environmental Conservation

Permit ID: 5-5330-00015/00029

Facility DEC ID: 5533000015

