



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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 5-5352-00007/00023  
Effective Date: 10/19/2015 Expiration Date: 10/18/2020

Permit Issued To: COMMONWEALTH PLYWOOD INC  
15 LABELLE BLVD  
PO BOX 90  
STE-THERESE, QC J7E 4H9

Contact: CHRISTIAN NOEL  
COMMONWEALTH PLYWOOD INC  
PO BOX 30  
WHITEHALL, NY 12887

Facility: COMMONWEALTH PLYWOOD INC  
10068 US RTE 4  
WHITEHALL, NY 12887

Contact: CHRISTIAN NOEL  
COMMONWEALTH PLYWOOD INC  
PO BOX 30  
WHITEHALL, NY 12887

Description:

Commonwealth Plywood produces softwood and hardwood plywood panels. Veneers are peeled from rough cut logs and dried in one of two veneer dryers. The facility also purchases dried hardwood veneers. The dried veneers are assembled using a heat-set resin to form plywood cores. In some cases, the purchased hardwood veneers are glued to the cores. The plywood panels are then trimmed and sanded to 4' X 8' sheets of various thickness and grades.

This renewal includes a cap on carbon monoxide (CO) in order to avoid prevention of significant deterioration (PSD) applicability. Compliance with the CO cap will be based upon annual testing of the major CO source, the Wellons Fuel Cell, for CO along with AP-42 emission factors for the wood fired and propane boilers.

**New York State Department of Environmental Conservation**  
Facility DEC ID: 5535200007



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:           KEVIN R BLISS  
  NYSDEC - WARRENSBURG SUBOFFICE  
  232 GOLF COURSE RD  
  WARRENSBURG, NY 12885-1172

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



**Notification of Other State Permittee Obligations**

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

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

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

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

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

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

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

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



**LIST OF CONDITIONS**

**DEC GENERAL CONDITIONS**

**General Provisions**

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

**Facility Level**

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



**DEC GENERAL CONDITIONS**

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

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

**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**

**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

**Condition 3: Applications for permit renewals, modifications and transfers**

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

Permits are transferrable with the approval of the department unless specifically prohibited by



the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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

**Item 4.1:**

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

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

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

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

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road  
Warrensburg, NY 12885-1172  
(518) 623-1281

**New York State Department of Environmental Conservation**

Permit ID: 5-5352-00007/00023

Facility DEC ID: 5535200007



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

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

**IDENTIFICATION INFORMATION**

Permit Issued To: COMMONWEALTH PLYWOOD INC  
15 LABELLE BLVD  
PO BOX 90  
STE-THERESE, QC J7E 4H9

Facility: COMMONWEALTH PLYWOOD INC  
10068 US RTE 4  
WHITEHALL, NY 12887

Authorized Activity By Standard Industrial Classification Code:  
2421 - SAWMILLS & PLANING MILLS GENERAL  
2435 - HARDWOOD VENEER AND PLYWOOD  
2436 - SOFTWOOD VENEER AND PLYWOOD

Permit Effective Date: 10/19/2015

Permit Expiration Date: 10/18/2020



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
  - 2 6 NYCRR 201-6.4 (a) (7): Fees
  - 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
  - 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
  - 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
  - 6 6 NYCRR 201-6.4 (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 201-6.4 (a) (4): Requirement to Provide Information
  - 16 6 NYCRR 201-6.4 (a) (8): Right to Inspect
  - 17 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
  - 18 6 NYCRR 202-1.1: Required Emissions Tests
  - 19 40 CFR Part 68: Accidental release provisions.
  - 20 40CFR 82, Subpart F: Recycling and Emissions Reduction
  - 21 6 NYCRR Subpart 201-6: Emission Unit Definition
  - 22 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
  - 23 6 NYCRR Subpart 201-7: Facility Permissible Emissions
  - \*24 6 NYCRR Subpart 201-7: Capping Monitoring Condition
  - \*25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
  - 26 6 NYCRR 211.1: Air pollution prohibited
  - 27 6 NYCRR 212.4 (c): Compliance Certification
  - 28 6 NYCRR 212.6 (a): Compliance Certification
  - 29 6 NYCRR 212.6 (a): Compliance Certification
  - 30 6 NYCRR 212.9 (b): Compliance Certification
  - 31 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification
  - 32 40CFR 63, Subpart JJJJJ: Applicability
  - 33 40CFR 63, Subpart JJJJJ: Compliance and Enforcement
- #### Emission Unit Level
- 34 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
  - 35 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

**EU=1-11997,EP=00007**

- 36 6 NYCRR 227-1.3 (a): Compliance Certification

**EU=1-11997,EP=00015**

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37 6 NYCRR 227-1.2 (a) (4): Compliance Certification

38 6 NYCRR 227-1.3 (a): Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

39 ECL 19-0301: Contaminant List

40 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities

41 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, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department 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 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 and maintained;

(3) During the period of the emergency the facility owner 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 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 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 201-6.2 (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 201-6.2 (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 201-6.4 (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 201-6.4 (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 201-6.4 (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 201-6.4 (a) (6)**

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



**Item I: Severability - 6 NYCRR 201-6.4 (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 201-6.4 (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 201-6.4 (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 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 200.6**

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

**Condition 2: Fees**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

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

**Condition 3: Recordkeeping and Reporting of Compliance Monitoring**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (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 201-6.2 of Part 201.

**Condition 4: Records of Monitoring, Sampling, and Measurement  
Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (2)**

**Item 4.1:**

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

**Condition 5: Compliance Certification  
Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 5.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 5.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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



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

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

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

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



Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(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 may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent 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) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.



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 1/30/2016.

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

**Condition 6: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.

- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

- iii. Compliance certifications shall be submitted



**New York State Department of Environmental Conservation**

Permit ID: 5-5352-00007/00023

Facility DEC ID: 5535200007



The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

**Condition 8: Recordkeeping requirements  
Effective between the dates of 10/19/2015 and 10/18/2020**

**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 10/19/2015 and 10/18/2020**

**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 10/19/2015 and 10/18/2020**

**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 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 11.1:**

Where practical, the owner or operator of 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 10/19/2015 and 10/18/2020**

**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 10/19/2015 and 10/18/2020**

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

**Item 13.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

**Condition 14: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 15: Requirement to Provide Information**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)**







**Item 20.1:**

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 21: Emission Unit Definition**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 21.1:**

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

Emission Unit: 1-01997

Emission Unit Description:

This emission unit includes direct-fired and indirect-fired veneer dryers and the 25-million Btu/hr wood-fired fuel cell. The fuel cell provides hot air for the direct-fired veneer drying process. The direct-fired veneer dryer is the exhaust for the fuel cell.

Building(s): A

**Item 21.2:**

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

Emission Unit: 1-11997

Emission Unit Description:

This emission unit includes a 16-million Btu/hr wood fired boiler, a 20-million Btu/hr propane-fired boiler, a log kiln, and a plywood press. The wood-fired boiler provides process steam for the log kiln and the glue press. The propane boiler is used as a back-up to the wood-fired boiler. Emissions from the plywood press are vented inside the mill.

Building(s): A

**Item 21.3:**

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

Emission Unit: 1-21997

Emission Unit Description:

This emission unit includes the equipment used for trimming the veneer and trimming and sanding the plywood panels, including the veneer clipper, trim saw, hogger, and sander. Veneer and plywood trimmings are conveyed to the hogger, and the hogged wood residue is directed to either the dry bin, via a cyclone, or to the dry silo to be used as fuel. Sander dust is captured and directed to

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the baghouse.

Building(s): A

**Item 21.4:**

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

Emission Unit: 1-31997

Emission Unit Description:

This emission unit includes the equipment used for storage and mixing of resins applied to veneers in the plywood press. these sources include the 2-compartment resin storage tank and the resin mix station. The storage tank compartments include conservation vents, which discharge within the building. The mix station includes a canopy hood and is vented to Emission Point 00019

Building(s): A

**Condition 22: Progress Reports Due Semiannually**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)**

**Item 22.1:**

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 23: Facility Permissible Emissions**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 23.1:**

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

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

CAS No: 000630-08-0

PTE: 450,000 pounds per year

Name: CARBON MONOXIDE

**Condition 24: Capping Monitoring Condition**  
**Effective between the dates of 10/19/2015 and 10/18/2020**



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

**Item 24.1:**

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 (j) (2)

**Item 24.2:**

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

**Item 24.3:**

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 24.4:**

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 24.5:**

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 24.6:**

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

**Item 24.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide emissions of carbon monoxide (CO) are limited to less than 225 tpy in order to avoid PSD applicability. CO from the direct-fired veneer dryer will be limited by excluding bark from the fuel supplied to the wood-fired fuel cell. The dryer CO emission rate will be determined by an annual stack test. The test results will



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

Emission Unit: 1-01997  
Process: 261

Emission Point: 0003A  
Emission Source: 00A80

Regulated Contaminant(s):  
CAS No: 000630-08-0 CARBON MONOXIDE

**Item 25.7:**

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Carbon Monoxide (CO) emissions from the (Moore) direct fired drier are limited to less than 225 tpy on a 12-month rolling basis in order to avoid PSD applicability. CO from the direct-fired veneer dryer will be limited by excluding bark from the fuel supplied to the wood-fired fuel cell. The dryer CO emission rate will be determined by an annual stack test. The test results will be correlated to the dryer production rate to establish the emission factor.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2016.

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

**Condition 26: Air pollution prohibited**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement:6 NYCRR 211.1**

**Item 26.1:**

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

**Condition 27: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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



**Item 27.1:**

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

Emission Unit: 1-01997	Emission Point: 00004
Emission Unit: 1-01997	Emission Point: 00005
Emission Unit: 1-01997	Emission Point: 0003A
Emission Unit: 1-01997	Emission Point: 0003B
Emission Unit: 1-01997	Emission Point: EF001
Emission Unit: 1-01997	Emission Point: EF002
Emission Unit: 1-01997	Emission Point: EF003
Emission Unit: 1-01997	Emission Point: EF004
Emission Unit: 1-21997	Emission Point: 00001
Emission Unit: 1-21997	Emission Point: 00016
Emission Unit: 1-21997	Emission Point: 00018
Emission Unit: 1-31997	Emission Point: 00019

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

**Item 27.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 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 28: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 28.1:**

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

Emission Unit: 1-21997	Emission Point: 00001
Emission Unit: 1-21997	Emission Point: 00016
Emission Unit: 1-21997	Emission Point: 00018
Emission Unit: 1-31997	Emission Point: 00019

**Item 28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 29: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 29.1:**

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

Emission Unit: 1-01997	Emission Point: 00004
Emission Unit: 1-01997	Emission Point: 00005
Emission Unit: 1-01997	Emission Point: 0003A



Emission Unit: 1-01997	Emission Point: 0003B
Emission Unit: 1-01997	Emission Point: 0020A
Emission Unit: 1-01997	Emission Point: 0020B
Emission Unit: 1-01997	Emission Point: 0020C
Emission Unit: 1-01997	Emission Point: 0021A
Emission Unit: 1-01997	Emission Point: 0021B
Emission Unit: 1-01997	Emission Point: EF001
Emission Unit: 1-01997	Emission Point: EF002
Emission Unit: 1-01997	Emission Point: EF003
Emission Unit: 1-01997	Emission Point: EF004

**Item 29.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator will cause or allow emissions having an average opacity during any 6 consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. This facility shall be required to perform the following:

1) Observe the stack for each plywood veneer dryer exhaust (emission points 0003A, 0003B, 00004, 00005, 0020A 00020B, 0020C, 0021A, 0021B) and emission points EF001, EF002, EF003 and EF004 for visible emissions. This observation(s) must be conducted daily 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:

- weather condition
- was a plume observed?

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, then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted. If there are no personnel certified in Method 9 readings on site, 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 action 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.

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: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 30: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement: 6 NYCRR 212.9 (b)**

**Item 30.1:**  
The Compliance Certification activity will be performed for the facility:  
The Compliance Certification applies to:

Emission Unit: 1-01997  
Process: 260

Regulated Contaminant(s):  
CAS No: 000075-07-0 ACETALDEHYDE  
CAS No: 000050-00-0 FORMALDEHYDE

**Item 30.2:**

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Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Operation of the Plymac indirect drier is not to exceed 1125 hr per 12 month rolling period. This limit assures impact of formaldehyde and acetaldehyde do not exceed 10 times their AGC. MACT for this source is no control.

Work Practice Type: HOURS PER YEAR OPERATION

Upper Permit Limit: 1125 hours

Monitoring Frequency: Hourly when in use

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 1/30/2016.

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

**Condition 31: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable Federal Requirement: 6 NYCRR 212.10 (c) (4) (iii)**

**Item 31.1:**

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-01997

Process: 260

Emission Unit: 1-01997

Process: 261

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 31.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Commonwealth Plywood has demonstrated (April 2015) that no control meets RACT requirements for control of VOCs. A submittal has been sent to USEPA for approval as a revision to the SIP by the Department.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 32: Applicability**



Effective between the dates of 10/19/2015 and 10/18/2020

Applicable Federal Requirement:40CFR 63, Subpart JJJJJJ

**Item 32.1:**

Facilities that are area sources of HAP with industrial, commercial, or institutional boilers must comply with applicable portions of 40 CFR 63 JJJJJJ.

**Condition 33: Compliance and Enforcement**

Effective between the dates of 10/19/2015 and 10/18/2020

Applicable Federal Requirement:40CFR 63, Subpart JJJJJJ

**Item 33.1:**

The Department has not accepted delegation of 40 CFR Part 63 Subpart JJJJJJ. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart JJJJJJ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

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

**Condition 34: Emission Point Definition By Emission Unit**

Effective between the dates of 10/19/2015 and 10/18/2020

Applicable Federal Requirement:6 NYCRR Subpart 201-6

**Item 34.1:**

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

Emission Unit: 1-01997

Emission Point: 00004

Height (ft.): 70 Diameter (in.): 19  
NYTMN (km.): 4822.898 NYTME (km.): 630.495 Building: A

Emission Point: 00005

Height (ft.): 28 Length (in.): 52 Width (in.): 30  
NYTMN (km.): 4822.895 NYTME (km.): 630.5 Building: A

Emission Point: 0003A

Height (ft.): 70 Diameter (in.): 19  
NYTMN (km.): 4822.898 NYTME (km.): 630.48 Building: A



Emission Point: 0003B  
Height (ft.): 70 Diameter (in.): 19  
NYTMN (km.): 4822.898 NYTME (km.): 630.48 Building: A

Emission Point: 0020A  
Height (ft.): 70 Diameter (in.): 24  
NYTMN (km.): 4822.915 NYTME (km.): 630.493 Building: A

Emission Point: 0020B  
Height (ft.): 70 Diameter (in.): 28  
NYTMN (km.): 4822.915 NYTME (km.): 630.5 Building: A

Emission Point: 0020C  
Height (ft.): 70 Diameter (in.): 28  
NYTMN (km.): 4822.915 NYTME (km.): 630.505 Building: A

Emission Point: 0021A  
Height (ft.): 35 Diameter (in.): 36  
NYTMN (km.): 4822.915 NYTME (km.): 630.507 Building: A

Emission Point: 0021B  
Height (ft.): 29 Diameter (in.): 36  
NYTMN (km.): 4822.915 NYTME (km.): 630.51 Building: A

Emission Point: EF001  
Height (ft.): 29 Diameter (in.): 36  
NYTMN (km.): 4822.906 NYTME (km.): 630.492 Building: A

Emission Point: EF002  
Height (ft.): 29 Diameter (in.): 36  
NYTMN (km.): 4822.907 NYTME (km.): 630.495 Building: A

Emission Point: EF003  
Height (ft.): 29 Diameter (in.): 36  
NYTMN (km.): 4822.908 NYTME (km.): 630.499 Building: A

Emission Point: EF004  
Height (ft.): 29 Diameter (in.): 36  
NYTMN (km.): 4822.909 NYTME (km.): 630.503 Building: A

**Item 34.2:**

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

Emission Unit: 1-11997

Emission Point: 00007  
Height (ft.): 33 Diameter (in.): 16  
NYTMN (km.): 4822.905 NYTME (km.): 630.575 Building: A

Emission Point: 00015  
Height (ft.): 33 Diameter (in.): 24  
NYTMN (km.): 4822.871 NYTME (km.): 630.505 Building: A



**Item 34.3:**

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

Emission Unit: 1-21997

Emission Point: 00001

Height (ft.): 42 Diameter (in.): 48  
NYTMN (km.): 4822.871 NYTME (km.): 630.435 Building: A

Emission Point: 00016

Height (ft.): 62 Diameter (in.): 48  
NYTMN (km.): 4822.9 NYTME (km.): 630.629 Building: A

Emission Point: 00018

Height (ft.): 36 Diameter (in.): 36  
NYTMN (km.): 4822.902 NYTME (km.): 630.635 Building: A

**Item 34.4:**

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

Emission Unit: 1-31997

Emission Point: 00019

Height (ft.): 32 Diameter (in.): 35  
NYTMN (km.): 4822.916 NYTME (km.): 630.55 Building: A

**Condition 35: Process Definition By Emission Unit  
Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 35.1:**

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

Emission Unit: 1-01997

Process: 260 Source Classification Code: 3-07-007-69

Process Description:

Mixed species veneers, including poplar and pine, of varying thicknesses and grades are dried to specified moisture contents in an indirect-fired dryer using process steam.

Emission Source/Control: 00A86 - Process

**Item 35.2:**

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

Emission Unit: 1-01997

Process: 261 Source Classification Code: 3-07-007-16

Process Description:

Mixed species veneers, including poplar and pine, of

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varying thicknesses and grades are dried to specified moisture contents in a direct-fired dryer that is provided with hot air from a wood-fired fuel cell.

Emission Source/Control: 00A20 - Combustion

Emission Source/Control: 00A80 - Process

**Item 35.3:**

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

Emission Unit: 1-11997

Process: 262

Source Classification Code: 1-02-010-02

Process Description:

The 20.9 MMBTU/hr propane backup boiler is used to provide process steam when the Wellons Boiler is unavailable.

Emission Source/Control: 00A30 - Combustion

**Item 35.4:**

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

Emission Unit: 1-11997

Process: 263

Source Classification Code: 3-07-007-30

Process Description:

Logs are heated in the Log Kiln, a non-point source, using steam from the wood-fired or propane-fired boilers.

Emission Source/Control: 0A100 - Process

**Item 35.5:**

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

Emission Unit: 1-11997

Process: 264

Source Classification Code: 3-07-007-81

Process Description:

Dried veneers are glued together in the plywood press using phenol-or urea-formaldehyde resin and process steam.

Emission Source/Control: 00A90 - Process

**Item 35.6:**

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

Emission Unit: 1-11997

Process: 265

Source Classification Code: 1-02-009-02

Process Description:

Wood residue is combusted in the 16-mmBTU/hr Wellons boiler to produce process steam.



Emission Source/Control: 00A10 - Combustion

Emission Source/Control: 00A11 - Control  
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

**Item 35.7:**

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

Emission Unit: 1-21997  
Process: 266 Source Classification Code: 3-07-007-02  
Process Description:  
The plywood is sanded prior to distribution. Sander dust is captured and directed to the baghouse.

Emission Source/Control: 00A46 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: 00A71 - Process

**Item 35.8:**

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

Emission Unit: 1-21997  
Process: 267 Source Classification Code: 3-07-007-10  
Process Description:  
Veneer and plywood trimmings are captured and conveyed to the hogger. Hogged wood is conveyed to either the Dry Bin via Cyclone #1, or the the dry Silo.

Emission Source/Control: 00A40 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: 00A50 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: 00A41 - Process

Emission Source/Control: 00A42 - Process

Emission Source/Control: 00A43 - Process

Emission Source/Control: 00A44 - Process

Emission Source/Control: 00A45 - Process

**Item 35.9:**

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

Emission Unit: 1-31997  
Process: 268 Source Classification Code: 3-14-015-03  
Process Description:  
This process consists of the preparation and storage of



PF resin to be applied to veneers in the glue press plus  
the storage of caustic.

Emission Source/Control: 0A202 - Process

Emission Source/Control: 0A300 - Process

**Item 35.10:**

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

Emission Unit: 1-31997

Process: 269

Source Classification Code: 3-14-015-03

Process Description:

This process consists of the storage of  
urea-formaldehyde resin to be applied to veneers prior to  
pressing.

Emission Source/Control: 0A202 - Process

Emission Source/Control: 0A300 - Process

**Condition 36: Compliance Certification**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 36.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-11997

Emission Point: 00007

**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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 exceed 27 percent, based upon  
the six minute average in reference test Method 9 in  
Appendix A of 40CFR 60. Compliance testing will be  
conducted at the discretion of the Department.

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: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 37: Compliance Certification**



Effective between the dates of 10/19/2015 and 10/18/2020

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

**Item 37.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-11997 Emission Point: 00015

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

**Item 37.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for any sized boiler firing solid fuel and not subject to the provisions of 6NYCRR 227-1.2(a)(3) shall be no greater than 0.54 #/MMBTU input. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.54 pounds per million Btus

Reference Test Method: Method 5

Monitoring Frequency: UPON PERMIT RENEWAL

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 38: Compliance Certification**  
Effective between the dates of 10/19/2015 and 10/18/2020

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

**Item 38.1:**

The Compliance Certification activity will be performed for:

Emission Unit: 1-11997 Emission Point: 00015

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

**Item 38.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity (on a six minute



block period) except for one six minute block 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.

Operators of air contamination sources that 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(s) or vent(s) 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:
  - weather condition
  - was a plume observed?

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, then the 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.

Parameter Monitored: OPACITY  
Upper Permit Limit: 20 percent

**New York State Department of Environmental Conservation**

**Permit ID: 5-5352-00007/00023**

**Facility DEC ID: 5535200007**



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 1/30/2016.

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



**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 39: Contaminant List**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 39.1:**  
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: 000075-07-0  
Name: ACETALDEHYDE

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

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

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

**Condition 40: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

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

**Item 40.1:**

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, 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 department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements



listed above must be adhered to in such circumstances.

**Condition 41: Visible Emissions Limited**  
**Effective between the dates of 10/19/2015 and 10/18/2020**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 41.1:**

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.

