

New York State Department of Environmental Conservation
Facility DEC ID: 6221800017



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 6-2218-00017/00009
Effective Date: 03/17/2005 Expiration Date: 03/16/2010

Permit Issued To: KNOWLTON SPECIALTY PAPERS INC
213 FACTORY ST
WATERTOWN, NY 13601-2748

Contact: FRANKLIN CEAN
KNOWLTON SPECIALTY PAPERS INC
213 FACTORY ST
WATERTOWN, NY 13601

Facility: KNOWLTON SPECIALTY PAPERS
213 FACTORY ST
WATERTOWN, NY 13601

Description:

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: BRIAN D FENLON
DIVISION OF ENVIRONMENTAL PERMITS
STATE OFFICE BLDG, 317 WASHINGTON ST
WATERTOWN, NY 13601-3787

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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, or operation and

maintenance of, the facility or facilities authorized by the permit whether in compliance or not in

compliance with the terms and conditions of the permit. This indemnification does not extend to

any DEC's own negligent or

intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising

under 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

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

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 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 and Modifications

Permit Modifications, Suspensions and Revocations by the Department

Facility Level

Submission of Applications for Permit Modification or Renewal -REGION 6
HEADQUARTERS



DEC GENERAL CONDITIONS

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

ains 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 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 and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the 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:



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

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

Item 4.1:

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

ation 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,

ance of the existing permit;

- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

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

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.5(a)

Item 5.1:

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

NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245



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ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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WATERTOWN, NY 13601-2748

Facility: KNOWLTON SPECIALTY PAPERS
213 FACTORY ST
WATERTOWN, NY 13601

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



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6NYCRR 201-6: Emission Unit Definition
- 2 6NYCRR 201-6.5(c): Recordkeeping and reporting of compliance monitoring
- 3 6NYCRR 201-6.5(c)(2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 4 6NYCRR 201-6.5(c)(3)(ii): Compliance Certification
- 5 6NYCRR 201-6.5(e): Compliance Certification
- 6 6NYCRR 201-6.5(g): Non Applicable requirements
- 7 6NYCRR 202-2.1: Compliance Certification
- 8 6NYCRR 202-2.5: Recordkeeping requirements
- 9 6NYCRR 212.6(a): Compliance Certification
- 10 6NYCRR 228.1(d): Will remain subject
- 11 6NYCRR 228.2: Compliance Certification
- 12 6NYCRR 228.5(a): Compliance Certification
- 13 6NYCRR 228.5(d): Compliance Certification
- 14 6NYCRR 228.6(a): Prohibition of Sale
- 15 6NYCRR 228.10: Compliance Certification
- 16 40CFR 68: Accidental release provisions.
- 17 40CFR 82, Subpart F: Recycling and Emissions Reduction

Emission Unit Level

- 18 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 19 6NYCRR 201-6: Process Definition By Emission Unit

EU=1-AQSAT

- 20 6NYCRR 228.5(b): Compliance Certification
- 21 6NYCRR 228.7: Compliance Certification
- 22 40CFR 63, Subpart A: NESHAP General Provisions

EU=1-AQSAT,EP=LAM01

- 23 6NYCRR 228.4: Compliance Certification

EU=1-PAPER

- 24 6NYCRR 212.4(c): Compliance Certification

EU=1-PAPER,Proc=PMS

- 25 6NYCRR 212.4(a): Compliance Certification

EU=1-SVSAT

- 26 6NYCRR 228.3(b): Compliance Certification
- 27 6NYCRR 228.3(b): Compliance Certification
- 28 6NYCRR 228.3(b): Compliance Certification



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- 29 40CFR 63, Subpart A: NESHAP General Provisions
- 30 40CFR 63.3320(b)(1), Subpart JJJJ: Compliance Certification
- 31 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification
- 32 40CFR 63.3330(a), Subpart JJJJ: Compliance date for existing affected sources.
- 33 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 34 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification
- 35 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification
- 36 40CFR 63.3360(e), Subpart JJJJ: Compliance Certification
- 37 40CFR 63.3360(e)(1), Subpart JJJJ: Compliance Certification
- 38 40CFR 63.3360(e)(2), Subpart JJJJ: Recording of process information during performance test.
- 39 40CFR 63.3360(e)(3)(i), Subpart JJJJ: Compliance Certification
- 40 40CFR 63.3360(f), Subpart JJJJ: Compliance Certification
- 41 40CFR 63.3360(g), Subpart JJJJ: Determination of volatile matter retained in coated web or otherwise not emitted to the atmosphere
- 42 40CFR 63.3370(e), Subpart JJJJ: Compliance Certification
- 43 40CFR 63.3370(k)(1), Subpart JJJJ: Compliance Certification
- 44 40CFR 63.3370(k)(2)(i), Subpart JJJJ: Compliance Certification
- 45 40CFR 63.3370(k)(3)(i), Subpart JJJJ: Compliance Certification
- 46 40CFR 63.3400(b), Subpart JJJJ: Compliance Certification
- 47 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification
- 48 40CFR 63.3400(d), Subpart JJJJ: Compliance Certification
- 49 40CFR 63.3400(e), Subpart JJJJ: Compliance Certification
- 50 40CFR 63.3400(f), Subpart JJJJ: Compliance Certification
- 51 40CFR 63.3400(g), Subpart JJJJ: Compliance Certification
- 52 40CFR 63.3410, Subpart JJJJ: Compliance Certification

EU=1-SVSAT,Proc=BLR

- 53 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.
- 54 40CFR 60.7(a), NSPS Subpart A: Modification Notification
- 55 40CFR 60.9, NSPS Subpart A: Availability of information.
- 56 40CFR 60.12, NSPS Subpart A: Circumvention.
- 57 40CFR 60.14, NSPS Subpart A: Modifications.
- 58 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Certification
- 59 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification
- 60 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Certification

EU=1-SVSAT,Proc=MIX

- 61 6NYCRR 212.10(c)(4)(iii): Compliance Certification
- 62 40CFR 63.9495(a), Subpart QQQQQ: Compliance date for existing solvent mixers.
- 63 40CFR 63.9500(a), Subpart QQQQQ: Compliance Certification
- 64 40CFR 63.9505(a), Subpart QQQQQ: Compliance Certification
- 65 40CFR 63.9505(b), Subpart QQQQQ: Compliance Certification
- 66 40CFR 63.9505(c), Subpart QQQQQ: Compliance Certification
- 67 40CFR 63.9515(a), Subpart QQQQQ: Compliance Certification



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- 68 40CFR 63.9530(c), Subpart QQQQQ: Compliance Certification
- 69 40CFR 63.9530(e), Subpart QQQQQ: Compliance Certification
- 70 40CFR 63.9535, Subpart QQQQQ: Compliance Certification
- 71 40CFR 63.9540, Subpart QQQQQ: Compliance Certification
- 72 40CFR 63.9540(d), Subpart QQQQQ: Compliance Certification
- 73 40CFR 63.9545, Subpart QQQQQ: Compliance Certification
- 74 40CFR 63.9550, Subpart QQQQQ: Compliance Certification
- 75 40CFR 63.9570, Subpart QQQQQ: Alternative compliance requirements.

EU=1-SVSAT,EP=M0001

- 76 6NYCRR 212.4(b): Compliance Certification
- 77 6NYCRR 227-1.3(a): Compliance Certification
- 78 6NYCRR 228.5(f): Compliance Certification

EU=1-TANKS

- 79 6NYCRR 212.4(c): Compliance Certification
- 80 6NYCRR 212.10(c)(4)(iii): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 81 ECL 19-0301: Contaminant List
- 82 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- *83 6NYCRR 201-7.2(c): Capping Monitoring Condition
- 84 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 85 6NYCRR 201-7.2(c): Emission Unit Permissible Emissions

EU=1-SVSAT

- *86 6NYCRR 201-7.2(c): Capping Monitoring Condition

NOTE: * preceding the condition number indicates capping.PAPER

Permit Effective Date: 03/17/2005

Permit Expiration Date: 03/16/2010



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: 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

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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



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

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

Item I: 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



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

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

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

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

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

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

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renewal application.

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

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

Item O: Providing Information Upon Request - 6 NYCRR Part 201-6.5(a)(4)

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

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

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

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

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

Item R: Fees - 6 NYCRR Part 201-6.5(a)(7)

The owner and/or operator of a stationary source shall pay fees to the department consistent with the fee schedule authorized by 6 NYCRR Subpart 482-2.

Item S: Right to Inspect - 6 NYCRR Part 201-6.5(a)(8)

Upon presentation of credentials and other documents, as

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may be required by law, the permittee shall allow the Department or an authorized representative to perform the following:

- i. Enter upon the permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- iii. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- iv. As authorized by the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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

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

Item U: Progress Reports and Compliance Schedules - 6 NYCRR Part 201-6.5(d)(5)

Progress reports consistent with an applicable schedule of compliance must be submitted at least semiannually on a calendar year basis, or at a more frequent period if specified in the applicable requirement or by the Department elsewhere in this permit. These reports shall be submitted to the Department within 30 days after the end of a reporting period. 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

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or corrective measures adopted.

Item V: Off Permit Changes - 6 NYCRR Part 201-6.5(f)(6)

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provisions of Title I of the Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the Administrator and the Department with written notification in advance of the proposed changes within a minimum of 7 days as required by 6 NYCRR §201-6.5(f)(6).

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or

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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 X: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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

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

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

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

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

Proceedings to reopen and issue Title V facility permits



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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 Y: 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 Z: 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 AA: 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 BB: 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

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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 CC: 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 subject to annual compliance certification requirements for Title V permits only.

**Condition 1: Emission Unit Definition
Effective between the dates of 03/17/2005 and 03/16/2010**

Applicable Federal Requirement: 6NYCRR 201-6

Item 1.1:

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

Emission Unit: 1-AQSAT

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF AN AQUEOUS SATURATOR LINE (AQSAT) AND THE GLUE LAMINATOR (GLLAM). EMISSIONS VENT FROM EPS AS001 AND LAM01.

Building(s): BBISL

Item 1.2:

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

Emission Unit: 1-PAPER

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF 3 PAPER

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MACHINES (PAP01, PAP02, AND PAP03) EACH OF WHICH INCLUDES A DRYER SECTION. EMISSIONS VENT FROM TWO POINTS FOR PAPER MACHINE 1, THREE POINTS FOR PAPER MACHINE 2 AND ONE POINT FOR THE PILOT PAPER MACHINE (PAP03).

Building(s): MAIN

Item 1.3:

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

Emission Unit: 1-SVSAT

Emission Unit Description:

THIS EMISSION UNIT INVOLVES SOLVENT COATING OPERATIONS. IT CONSISTS OF A RESIN KITCHEN WITH MIX VESSELS (MIXVS) AND SOLVENT WASH TANK (WSHTK), TWO PAPER SATURATOR SECTIONS (SATUR) A UNWIND/WIND AREA (WINDU), A DRYER SECTION (DRYER), AND FINAL WINDER AREA (FWIND). HAP AND VOC EMISSIONS FROM THESE SOURCES ARE CONTROLLED BY A BOILER/INCINERATOR (BLRIN), AND ARE EXHAUSTED THROUGH EP M0001. AFTER THE DRYER SECTION, THERE IS AN INKING STATION (INKST), WHICH ALSO VENTS TO THE BOILER/INCINERATOR.

Building(s): BBISL

Item 1.4:

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

Emission Unit: 1-TANKS

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF TWO 10,000 GALLON UNDERGROUND TANKS USED TO STORE METHANOL. EACH TANK WILL VENT VIA ITS OWN EMISSION POINT (EPS TANK 1 AND TANK2).

Building(s): TNKFM

Condition 2: Recordkeeping and reporting of compliance monitoring Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 2.1:

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



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

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

Condition 3: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 3.1:

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 4: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 4.1:

The Compliance Certification activity will be performed for the Facility.

Item 4.2:

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

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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

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Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in



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the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 5: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

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

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:

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

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certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

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

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

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

The address for the RAPCE is as follows:

State Office Building
317 Washington Street
Watertown, NY 13601-3787

The address for the BQA is as follows:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2006.

Subsequent reports are due on the same day each year

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Condition 6: Non Applicable requirements
Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 6.1:

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

6NYCRR 212.10(c)(1)

Emission Unit: 1PAPER Process: PMS

Reason: This facility will not have to comply with the VOC RACT requirements of 6 NYCRR Part 212.10(c) as long as it maintains a VOC emission rate potential (ERP) below 3 lb/hr for each of the 3 paper machines making up this emission unit.

Facility will maintain records demonstrating the VOC ERP for each product run on the 3 paper machines. If at anytime the ERP equals or exceeds 3 lb/hr of VOC, the facility will submit a VOC RACT compliance plan to the Department as required by 6 NYCRR Part 212.10(c)(1).

40CFR 64

Emission Unit: 1SVSAT

Reason: The Compliance Assurance Monitoring provisions contained in 40 CFR Part 64 do not apply to emission unit 1-SVSAT. This emission unit is exempted from those requirements as detailed in 40 CFR Part 64.2(b)(1) - Exempt emission limitations or standards:

The requirements of this part shall not apply to any of the following emission limitations or standards:

(i) Emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act.

Condition 7: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 202-2.1

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Item 7.1:

The Compliance Certification activity will be performed for the Facility.

Item 7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 8: Recordkeeping requirements
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 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: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 9.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PAPER

Emission Unit: 1-TANKS

Item 9.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal (this may be zero percent opacity for many or all emission sources) and in compliance with section 212.6(a) are detected, the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify The Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 10: Will remain subject



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Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.1(d)

Item 10.1:

Any coating line that is or becomes subject to the provisions of 6 NYCRR Part 228 will remain subject to these provisions even if the annual potential to emit VOCs for the facility later falls below the thresholds set forth in 228.1(b).

Condition 11: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.2

Item 11.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-AQSAT

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 11.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For all surface coatings subject to 6NYCRR Part 228, the VOC content (as applied, minus water and exempt VOC), must be less than or equal to the limit specified in Table 1 or Table 2 for the respective surface that is coated.

The VOC content of a coating, as applied, shall be calculated as follows:

$$(\text{VOC})_a = [(\text{Wv})_a - (\text{Ww})_a - (\text{We})_a] / [1 - \{ (\text{Vw})_a + (\text{Ve})_a \}]$$

Where:

(VOC)_a = VOC content of a coating, as applied, expressed as pounds of VOC per gallon of coating minus water and excluded VOC

(Wv)_a = The pounds of total volatiles per gallon of an as applied coating



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(Ww)a = The pounds of water per gallon of an as applied coating

(We)a = The pounds of excluded VOC per gallon of an as applied coating

(Vw)a = The gallons of water per gallon of an as applied coating

(Ve)a = The gallons of excluded VOC per gallon of an as applied coating

Reference Test Method: EPA RM 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 12: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.5(a)

Item 12.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-AQSAT

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of any emission source subject to 6NYCRR Part 228 must maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual VOC content of each as applied coating, (VOC)a, used at the facility. In addition, purchase, usage and/or production records of the coating material, including solvents, must be maintained in a format acceptable to the Department and, upon request, these records must be submitted to the Department. Any facility required to perform the overall removal efficiency calculation, must maintain records to verify



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the parameters used in the calculation. A facility owner of operator must maintain a record that identifies each air cleaning device that has an overall removal efficiency of at least 85 percent. Any additional information required to determine compliance must be provided to the Department in a format acceptable to the Department.

Reference Test Method: EPA RM 24

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.5(d)

Item 13.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-AQSAT

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Representatives of the Department must be permitted during reasonable business hours, to obtain coating samples for the purpose of determining compliance with 6NYCRR Part 228.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Prohibition of Sale
Effective between the dates of 03/17/2005 and 03/16/2010

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Applicable Federal Requirement: 6NYCRR 228.6(a)

Item 14.1:

(A) No person shall sell, specify, or require for use the application of a coating on a part or product at a facility with a coating line described in table 1 or 2 in section 228.7 or 228.8 of 6NYCRR Part 228 if such use is prohibited by any of the provisions of this Part. The prohibition shall apply to all written or oral contracts under the terms of which any coating is to be applied to any part or product at this facility. This prohibition shall not apply to the following:

(1) coatings utilized at surface coating lines where control equipment has been installed to meet the maximum permitted VOC content limitations specified in tables 1 and 2 of sections 228.7 or 228.8 of 6NYCRR Part 228;

(2) coatings utilized at surface coating lines where a coating system is used which meets the requirements specified in section 228.3(d) of 6NYCRR Part 228; and

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility per section 228.3(e) of 6NYCRR Part 228.

Condition 15: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.10

Item 15.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-AQSAT

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

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

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

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.



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

**Condition 16: Accidental release provisions.
Effective between the dates of 03/17/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 68

Item 16.1:

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

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

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

**Condition 17: Recycling and Emissions Reduction
Effective between the dates of 03/17/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 17.1:

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

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

**Condition 18: Emission Point Definition By Emission Unit
Effective between the dates of 03/17/2005 and 03/16/2010**

Applicable Federal Requirement: 6NYCRR 201-6

Item 18.1:

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



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Emission Unit: 1-AQSAT

Emission Point: LAM01

Height (ft.): 19

Diameter (in.): 8

Building: BBISL

Item 18.2:

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

Emission Unit: 1-PAPER

Emission Point: P1EP1

Height (ft.): 24

Length (in.): 26

Width (in.): 28

Building: MAIN

Emission Point: P1EP2

Height (ft.): 24

Length (in.): 26

Width (in.): 28

Building: MAIN

Emission Point: P2EP1

Height (ft.): 28

Diameter (in.): 30

Building: MAIN

Emission Point: P2EP2

Height (ft.): 28

Diameter (in.): 30

Building: MAIN

Emission Point: P2EP3

Height (ft.): 28

Diameter (in.): 30

Building: MAIN

Emission Point: P3EP1

Height (ft.): 35

Diameter (in.): 24

Building: MAIN

Item 18.3:

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

Emission Unit: 1-SVSAT

Emission Point: M0001

Height (ft.): 95

Diameter (in.): 48

Building: BBISL

Item 18.4:

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



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Emission Unit: 1-TANKS

Emission Point: TANK1

Height (ft.): 18

Diameter (in.): 6

Building: TNKFM

Emission Point: TANK2

Height (ft.): 18

Diameter (in.): 6

Building: TNKFM

Condition 19: Process Definition By Emission Unit
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 201-6

Item 19.1:

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

Emission Unit: 1-AQSAT

Process: GLL

Source Classification Code: 4-02-044-35

Process Description:

THIS PROCESS INVOLVES THE USE OF
WATER-BASED GLUES IN THE GLUE LAMINATOR.
THIS PROCESS IS SUBJECT TO THE PAPER AND
OTHER WEB COATING MACT.

Emission Source/Control: GLLAM - Process

Item 19.2:

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

Emission Unit: 1-PAPER

Process: PMS

Source Classification Code: 3-07-013-99

Process Description:

THIS PROCESS INVOLVES MAKING PAPER IN 3
PAPER MACHINES, EACH OF WHICH INCLUDES A
DRYER SECTION.

Emission Source/Control: DRY01 - Process

Emission Source/Control: DRY02 - Process

Emission Source/Control: DRY03 - Process

Emission Source/Control: PAP01 - Process

Emission Source/Control: PAP02 - Process

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Emission Source/Control: PAP03 - Process

Item 19.3:

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

Emission Unit: 1-SVSAT

Process: BLR

Source Classification Code: 1-02-006-02

Process Description:

THIS PROCESS INVOLVES THE BOILER/INCINERATOR, WHICH PROVIDES PROCESS AND COMFORT HEATING TO THE FACILITY. THE BOILER IS FIRED WITH NATURAL GAS.

Emission Source/Control: BLRIN - Combustion

Design Capacity: 53.6 million British thermal units

Item 19.4:

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

Emission Unit: 1-SVSAT

Process: INK

Source Classification Code: 4-05-005-97

Process Description:

THIS PROCESS CONSISTS OF THE INK STATION, WHERE STRIPES MAY BE APPLIED TO THE BACK SIDE OF COATED PAPER. INK IS APPLIED USING A STAINLESS STEEL CYLINDER. THIS PROCESS IS SUBJECT TO THE PAPER AND OTHER WEB COATING MACT.

Emission Source/Control: BLRIN - Combustion

Design Capacity: 53.6 million British thermal units

Emission Source/Control: INKST - Process

Item 19.5:

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

Emission Unit: 1-SVSAT

Process: MIX

Source Classification Code: 4-02-013-03

Process Description:

THIS PROCESS INVOLVES THE MIXING OF COATINGS FOR USE ON THE COATING LINES. THE MIXING PROCESS IS SUBJECT TO THE FRICTION MATERIALS MANUFACTURING MACT.

Emission Source/Control: BLRIN - Combustion



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Design Capacity: 53.6 million British thermal units

Emission Source/Control: MIXVS - Process

Item 19.6:

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

Emission Unit: 1-SVSAT

Process: SS1

Source Classification Code: 4-02-013-01

Process Description:

THIS PROCESS INVOLVES THE SOLVENT SATURATOR, WHICH IS USED TO COAT PAPER SUBSTRATE. SPECIFICALLY, THIS PROCESS CONSISTS OF TWO PAPER SATURATOR SECTIONS, AN UNWIND/WIND AREA, A DRYER SECTION, AND A FINAL WINDER AREA. THE SOLVENT SATURATOR IS SUBJECT TO THE PAPER AND OTHER WEB COATING MACT.

Emission Source/Control: BLRIN - Combustion

Design Capacity: 53.6 million British thermal units

Emission Source/Control: DRYER - Process

Emission Source/Control: FWIND - Process

Emission Source/Control: SATUR - Process

Emission Source/Control: WINDU - Process

Item 19.7:

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

Emission Unit: 1-SVSAT

Process: WAS

Source Classification Code: 4-02-013-05

Process Description:

THIS PROCESS INVOLVES THE SOLVENT WASH TANK, WHICH IS USED TO REMOVE RESIDUAL RESIN MIXTURE FROM THE SATURATOR TROUGH AND ROLLERS.

Emission Source/Control: BLRIN - Combustion

Design Capacity: 53.6 million British thermal units

Emission Source/Control: WSHTK - Process

Item 19.8:

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

Emission Unit: 1-TANKS

Process: T01

Source Classification Code: 4-07-008-14

Process Description:

THIS PROCESS INVOLVES THE FILLING AND
STORAGE OPERATIONS FOR TANK1 AND TANK2.

Emission Source/Control: TANK1 - Process

Design Capacity: 10,000 gallons

Emission Source/Control: TANK2 - Process

Design Capacity: 10,000 gallons

Condition 20: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.5(b)

Item 20.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner and operator of any emission source subject to 6NYCRR Part 228, must use Method 311 or Method 24 as presented in Appendices A of both 40 CFR Parts 63 and 60, respectively (see table 1, section 200.9 of Title 6), to measure the volatile content, water content, density, volume of solids, and weight of solids in order to determine the actual VOC content of an as applied coating during a compliance demonstration.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 21: Compliance Certification



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Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.7

Item 21.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Paper coating lines may contain a maximum of 2.9 pounds of VOC (minus water and excluded VOC) per gallon of coating as applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: RM 24 or 311

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 22: NESHAP General Provisions

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 22.1:

This Condition applies to Emission Unit: 1-AQSAT

Item 22.2:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.



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Condition 23: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.4

Item 23.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT Emission Point: LAM01

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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 subject to this requirement, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies semi-annually while the process is in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from a process source.

If visible emissions above those that are normal and in compliance with section 228.4 are detected (this may be zero percent opacity for many or all of the subject emission sources), the permittee shall determine the cause, make the necessary correction, and verify that the excess visible emissions problem has been corrected. If the permittee expects the excess visible emissions to occur in excess of 1 hour after discovery, the Department will be notified immediately.

If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the Department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

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If the opacity is determined to exceed the limits of section 228.4, the facility will be determined to be in violation, the permittee will remedy the problem, and will contact the Department. The provisions of Part 201-1.4 shall apply.

The semiannual monitoring report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations.

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 24: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 24.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER

Item 24.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particulates are limited to less than

0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

The Department reserves the right to perform or require the performance of a Method 5 emissions evaluation at any time.

The permittee will conduct compliance observations during operation at the monitoring frequency stated below.

These observations include pertinent information relating to particulate emissions of the source, including but not

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limited to production rate, process material, air flow rate, control equipment parameters, visible emissions, etc. The permittee will confirm that all pertinent parameters (whether used to directly calculate particulate emission rate, or as surrogates) are within ranges that ensure this source to be in compliance with the particulate emission rate.

Additionally, the permittee will immediately investigate any instance where there is cause to believe that particulate emissions above 0.05 gr/dscf are occurring or have occurred from a process source. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. During these instances the permittee shall determine the cause, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 grains per dscf
Monitoring Frequency: MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 25: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 212.4(a)

Item 25.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER
Process: PMS

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

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CAS No: 0NY100-00-0 HAP

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain records of the quantity of individual HAPs and VOCs contained in each product that is produced on the 3 paper machines which make up this Emission Unit. If requested the facility will perform an ambient air quality impact analysis on any HAP or VOC suspected of exceeding the Department's ambient guideline concentrations. The ambient air quality impact analysis procedure and ambient guideline concentrations are outlined in DEC Program Policy DAR-1.

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 7/30/2005.

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

Condition 26: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 26.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 26.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The capture and control system of emission unit 1-SVSAT must achieve at least a 98% overall removal efficiency of VOC. To demonstrate that the capture and control system is operating at an overall VOC removal efficiency of 98% or



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greater, the facility will continuously monitor the combustion temperature of the boiler/incinerator (emission source: BLRIN). The required minimum temperature, based on an hourly average of readings taken at 15 minute intervals, will be 1400 degrees fahrenheit.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1425 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 10/16/2005 for the period 03/17/2005 through 09/16/2005

Condition 27: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 27.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

In order to ensure a 100% capture efficiency of emissions from emission unit 1-SVSAT the negative pressure of the exhaust system will be continuously monitored. Monitoring will be conducted at a location upstream of the booster fan, which is located upstream of the boiler/incinerator (emission source: BLRIN). The required maximum pressure, based on an hourly average of readings taken at 15 minute intervals, will be -1.5 inches water column.

Parameter Monitored: PRESSURE

Upper Permit Limit: -1.5 inches of water

Reference Test Method: EPA Method 204

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



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Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 28: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.3(b)

Item 28.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 28.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The capture and control system of emission unit 1-SVSAT must achieve at least a 98% overall removal efficiency of VOC. To demonstrate compliance with this limit the facility will perform an emission test to determine the overall removal efficiency of the capture and control system at least once during the term of this permit.

Parameter Monitored: VOC

Lower Permit Limit: 98 percent

Reference Test Method: EPA RM 18 or 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST
METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 29: NESHAP General Provisions
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63, Subpart A

Item 29.1:

This Condition applies to Emission Unit: 1-SVSAT



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Item 29.2:

This emission source is subject to the applicable provisions of 40 CFR 63 Subpart A. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 30: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3320(b)(1), Subpart JJJJ

Item 30.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must limit organic HAP emissions to no more than 5% of the organic HAP applied for each month (95% reduction) on and after the compliance date specified in §63.3330. Compliance shall be demonstrated by following the provisions listed in §63.3370.

Monitoring Frequency: MONTHLY

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 7/30/2005.

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

Condition 31: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3321(a), Subpart JJJJ

Item 31.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):



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Item 31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For any web coating line or group of web coating lines for which the facility uses add-on control devices, unless a solvent recovery system and liquid-liquid material balance is used, the facility must meet the operating limits listed in Table 1 or according to the alternative operating limits listed in §63.3321(b). These operating limits apply to emission capture systems and control devices, and the facility must establish the operating limits during the performance test according to the requirements in §63.3360(e)(3). The facility must meet the operating limits at all times after the limits are established.

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 7/30/2005.

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

**Condition 32: Compliance date for existing affected sources.
Effective between the dates of 12/05/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 63.3330(a), Subpart JJJJ

Item 32.1:

This Condition applies to Emission Unit: 1-SVSAT

Item 32.2:

An existing affected source subject to the provisions of this subpart, must comply by December 5, 2005. Facility must complete any performance test required in § 63.3360 within the time limits specified in § 63.7(a)(2).

**Condition 33: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 63.3350(e), Subpart JJJJ

Item 33.1:

The Compliance Certification activity will be performed for:



Emission Unit: 1-SVSAT

Item 33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

(1) Each CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. There must be a minimum of four equally spaced successive cycles of CPMS operation to have a valid hour of data.

(2) There must be valid data from at least 90 percent of the hours during which the process operated.

(3) Facility must determine the hourly average of all recorded readings according to paragraphs (3)(i) and (ii) below.

(i) To calculate a valid hourly value, there must be at least three of four equally spaced data values from that hour from a continuous monitoring system (CMS) that is not out-of-control.

(ii) Provided all of the readings recorded in accordance with paragraph (3) clearly demonstrate continuous compliance with the standard that applies to the facility, then the facility is not required to determine the hourly average of all recorded readings.

(4) Facility must determine the rolling 3-hour average of all recorded readings for each operating period. To calculate the average for each 3-hour averaging period, there must be at least two of three of the hourly averages for that period using only average values that are based on valid data (i.e., not from out-of-control periods).

(5) Facility must record the results of each inspection, calibration, and validation check of the CPMS.

(6) At all times, facility must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(7) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), facility must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality



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assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in § 63.3370. Facility must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(8) Any averaging period for which there is no valid monitoring data and such data are required constitutes a deviation, and the facility must notify the Administrator in accordance with § 63.3400(c).

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

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 7/30/2005.

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

Condition 34: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3350(e), Subpart JJJJ

Item 34.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 34.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

If the facility is using a non-catalytic oxidizer to comply with the emission limits in §63.3320, the facility



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must install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart records, data logger, or temperature indicator must be replaced. The facility must replace the equipment whether the facility chooses not to perform the calibration or the equipment cannot be calibrated properly.

The facility must install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device must have an accuracy of +/-1% of the temperature being monitored in degrees Celsius, or +/-1 degree Celsius, whichever is greater. The thermocouple or temperature sensor must be installed in the combustion chamber at a location in the combustion zone.

The continuous temperature monitoring system must meet the requirements in §63.3350(e)(1)-(8).

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 760 degrees Centigrade (or Celsius)

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 35: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3350(f), Subpart JJJJ

Item 35.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

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Item 35.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is complying with the emission limits in §63.3320 through the use of a capture system and control device for one or more coating lines, the facility must develop a site-specific monitoring plan containing the following information for these capture systems:

- 1) The monitoring plan must identify the operating parameter to be monitored to ensure that the capture efficiency determined during the initial compliance test is maintained.
- 2) The monitoring plan must explain why this parameter is appropriate for demonstrating ongoing compliance.
- 3) The monitoring plan must identify the specific monitoring procedures
- 4) The monitoring plan must specify the operating parameter value or range of values that demonstrate compliance with the emission standards in §63.3320. The specified operating parameter value or range of values must represent the conditions present when the capture system is being properly operated and maintained.

The facility must monitor the capture system in accordance with the site-specific monitoring plan. Any deviation from the operating parameter value or range of values will be considered a deviation from the emission limit. The facility must review and update the capture system monitoring plan at least annually and make the plan available for inspection by the NYSDEC upon request.

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 7/30/2005.

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

Condition 36: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3360(e), Subpart JJJJ

Item 36.1:

The Compliance Certification activity will be performed for:



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Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is using an add-on control device other than solvent recovery, such as an oxidizer, to comply with the emission standards in §63.3320, the facility must conduct a performance test to establish the destruction or removal efficiency of the control device according to the methods and procedures in §63.3360(e)(1) and (2).

If the facility is using one or more add-on control devices other than a solvent recovery system for which the facility conducts a liquid-liquid material balance to comply with the emission standards in §63.3320, the facility must establish the applicable operating limits required by §63.3321 during the performance test. These operating limits apply to each add-on control device.

For a thermal oxidizer, the facility must establish the operating limits according to the provisions listed in §63.3360(e)(3)(i).

For a catalytic oxidizer, the facility must establish the operating limits according to the provisions listed in §63.3360(e)(3)(ii).

Reference Test Method: see description

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 7/30/2005.

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

Condition 37: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

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Applicable Federal Requirement: 40CFR 63.3360(e)(1), Subpart JJJJ

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 37.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An initial performance test to establish the destruction or removal efficiency of the control device must be conducted such that control device inlet and outlet testing is conducted simultaneously, and the data are reduced in accordance with the test methods and procedures in paragraphs (i) through (ix) below. Facility must conduct three test runs as specified in § 63.7(e)(3), and each test run must last at least 1 hour.

(i) Method 1 or 1A of 40 CFR part 60, appendix A, must be used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, 2D, 2F, or 2G of 40 CFR part 60, appendix A, must be used to determine gas volumetric flow rate.

(iii) Method 3, 3A, or 3B of 40 CFR part 60, appendix A, must be used for gas analysis to determine dry molecular weight. Facility may also use as an alternative to Method 3B the manual method for measuring the oxygen, carbon dioxide, and carbon monoxide content of exhaust gas in ANSI/ASME PTC 19.10-1981, "Flue and Exhaust Gas Analyses [Part 10, Instruments and Apparatus]," (incorporated by reference, see § 63.14).

(iv) Method 4 of 40 CFR part 60, appendix A, must be used to determine stack gas moisture.

(v) The gas volumetric flow rate, dry molecular weight, and stack gas moisture must be determined during each test run specified in paragraph (vii) below.

(vi) Method 25 or 25A of 40 CFR part 60, appendix A, must be used to determine total gaseous non-methane organic matter concentration. Use the same test method for both the inlet and outlet measurements which must be conducted simultaneously. Facility must submit notice of the intended test method to the Administrator for approval along with notification of the performance test required under § 63.7(b). Facility must use Method 25A if any of

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the conditions described in paragraphs (A) through (D) below, apply to the control device.

(A) The control device is not an oxidizer.

(B) The control device is an oxidizer but an exhaust gas volatile organic matter concentration of 50 ppmv or less is required to comply with the emission standards in § 63.3320; or

(C) The control device is an oxidizer but the volatile organic matter concentration at the inlet to the control system and the required level of control are such that they result in exhaust gas volatile organic matter concentrations of 50 ppmv or less; or

(D) The control device is an oxidizer but because of the high efficiency of the control device the anticipated volatile organic matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Except as provided in § 63.7(e)(3), each performance test must consist of three separate runs with each run conducted for at least 1 hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining volatile organic compound concentrations and mass flow rates, the average of the results of all the runs will apply.

(viii) Volatile organic matter mass flow rates must be determined for each run specified in paragraph (vii) above, using Equation 1 of this section:

$$Mf = QsdCc[12][0.0416][10^{-6}] \quad \text{Eq. 1}$$

Where:

Mf = Total organic volatile matter mass flow rate, kilograms (kg)/hour (h).

Qsd = Volumetric flow rate of gases entering or exiting the control device, as determined according to § 63.3360(e)(1)(ii), dry standard cubic meters (dscm)/h.

Cc = Concentration of organic compounds as carbon, ppmv.

12.0 = Molecular weight of carbon.

0.0416 = Conversion factor for molar volume, kg-moles per cubic meter (mol/m³) (@ 293 Kelvin (K) and 760 millimeters of mercury (mmHg)).

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(ix) For each run, emission control device destruction or removal efficiency must be determined using Equation 2 of this section:

$$E = \frac{M_{fi} - M_{fo}}{M_{fi}} \times 100 \quad \text{Eq. 2}$$

Where:

E = Organic volatile matter control efficiency of the control device, percent.

M_{fi} = Organic volatile matter mass flow rate at the inlet to the control device, kg/h.

M_{fo} = Organic volatile matter mass flow rate at the outlet of the control device, kg/h.

(x) The control device destruction or removal efficiency is determined as the average of the efficiencies determined in the test runs and calculated in Equation 2 of this section.

Parameter Monitored: DESTRUCTION EFFICIENCY

Lower Permit Limit: 95 percent reduction by weight

Reference Test Method: SEE DESCRIPTION

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 0 days after the reporting period.

The initial report is due 6/30/2005.

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

**Condition 38: Recording of process information during performance test.
Effective between the dates of 12/05/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 63.3360(e)(2), Subpart JJJJ

Item 38.1:

This Condition applies to Emission Unit: 1-SVSAT

Item 38.2:

Facility must record such process information as may be necessary to determine the conditions in existence at the time of the performance test. Operations during periods of startup, shutdown, and



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malfunction will not constitute representative conditions for the purpose of a performance test.

Condition 39: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3360(e)(3)(i), Subpart JJJJ

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 39.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

If the facility is using one or more add-on control devices other than a solvent recovery system for which they conduct a liquid-liquid material balance to comply with the emission standards in § 63.3320, it must establish the applicable operating limits required by § 63.3321. These operating limits apply to each add-on emission control device, and the facility must establish the operating limits during the performance test required by paragraph § 63.3360(e) of this section according to the requirements in paragraph (i) below.

(i) Thermal oxidizer. If the add-on control device is a thermal oxidizer, establish the operating limits according to paragraphs (A) and (B) below.

(A) During the performance test, the facility must monitor and record the combustion temperature at least once every 15 minutes during each of the three test runs. Facility must monitor the temperature in the firebox of the thermal oxidizer or immediately downstream of the firebox before any substantial heat exchange occurs.

(B) Use the data collected during the performance test to calculate and record the average combustion temperature maintained during the performance test. This average combustion temperature is the minimum operating limit for the thermal oxidizer.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1400 degrees Fahrenheit

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION



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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 7/30/2005.

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

Condition 40: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3360(f), Subpart JJJJ

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

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Item 40.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility is demonstrating compliance by meeting the requirements in § 63.3370(e), (f), (g), (h), (i)(2), (k), (n)(2), or (3), or (p), the facility must determine capture efficiency using the following procedures:

- 1) The facility may assume the capture efficiency equals 100% if the capture system is a permanent total enclosure (PTE). The facility must confirm that the capture system is a PTE by demonstrating that it meets the requirements of section 6 of EPA Method 204 of 40CFR51, appendix M, and that all exhaust gases from the enclosure are delivered to a control device.
- 2) The facility may determine capture efficiency according to the protocols for testing with temporary total enclosures that are specified in Methods 204 and 204A-F of 40CFR51, appendix M. The facility may exclude never-controlled work stations from such capture efficiency determinations.
- 3) The facility may use any capture efficiency protocol and test methods that satisfy the criteria of either the



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Data Quality Objective or the Lower Confidence Limit approach as described in appendix A of subpart KK of Part 63. The facility may exclude never-controlled work stations from such capture efficiency determinations.

Monitoring Frequency: SINGLE OCCURRENCE
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 7/30/2005.

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

**Condition 41: Determination of volatile matter retained in coated web or otherwise not emitted to the atmosphere
Effective between the dates of 12/05/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 63.3360(g), Subpart JJJJ

Item 41.1:

This Condition applies to Emission Unit: 1-SVSAT

Item 41.2:

The facility may choose to take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere when determining compliance with the emission standards in §63.3320. If the facility chooses this option, the facility must develop a testing protocol to determine the mass of volatile matter retained in the coated web or otherwise not emitted to the atmosphere and submit this protocol to EPA for approval. The facility must submit this protocol with the site-specific test plan under §63.7(f). If the facility intends to take into account the mass of volatile matter retained in the coated web after curing or drying or otherwise not emitted to the atmosphere and demonstrate compliance according to §63.3370(c)(3), (c)(4), (c)(5), or (d), then the test protocol submitted must determine the mass of organic HAP retained in the coated web or otherwise not emitted to the atmosphere. Otherwise, compliance must be shown using the volatile organic matter content as a surrogate for the HAP content of the coatings.

**Condition 42: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 63.3370(e), Subpart JJJJ

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

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Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must operate a capture system and control device and demonstrate an overall organic HAP control efficiency of at least 95% for each month, or operate a capture system and oxidizer so that an outlet organic HAP concentration of no greater than 20 ppmv by compound on a dry basis is achieved as long as the capture efficiency is 100% as detailed in §63.3320(b)(4).

The facility must demonstrate compliance in accordance with §63.3370(i) when emissions from the affected source are controlled by a solvent recovery device.

The facility must demonstrate compliance in accordance with §63.3370(j) when emissions from the affected source are controlled by a control device with a continuous parameter monitoring system (CPMS).

The facility must demonstrate compliance in accordance with §63.3370(k) when emissions from the affected source are controlled by an oxidizer.

If the affected source has only always-controlled work stations and operates more than one capture system or more than one control device, the facility must demonstrate compliance in accordance with the provisions of §63.3370(n) or (p).

If the affected source operates one or more never-controlled work stations or one or more intermittently-controlled work stations, the facility must demonstrate compliance in accordance with the provisions in §63.3370(n).

Monitoring Frequency: MONTHLY

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 7/30/2005.

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



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Condition 43: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3370(k)(1), Subpart JJJJ

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 43.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility must demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters as specified in paragraphs (i) through (iii) below:

(i) Determine the oxidizer destruction efficiency using the procedure in § 63.3360(e).

(ii) Determine the capture system capture efficiency in accordance with § 63.3360(f).

(iii) Capture and control efficiency monitoring.

Whenever a web coating line is operated, continuously monitor the operating parameters established in accordance with § 63.3350(e) and (f) to ensure capture and control efficiency.

Parameter Monitored: HAP

Lower Permit Limit: 95 percent reduction by weight

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 7/30/2005.

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

Condition 44: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3370(k)(2)(i), Subpart JJJJ



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Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Calculate the overall organic HAP control efficiency achieved using the following equation:

$$R = \frac{(E)(CE)}{100}$$

Where:

R = Overall organic HAP control efficiency, percent.

E = Organic volatile matter control efficiency of the control device, percent.

CE = Organic volatile matter capture efficiency of the capture system, percent.

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 7/30/2005.

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

Condition 45: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3370(k)(3)(i), Subpart JJJJ

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

The facility is in compliance with the emission standards in § 63.3320(b) if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with § 63.3360(e) for each 3-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with § 63.3350(f); and

(i) The overall organic HAP control efficiency is 95 percent or greater at an existing affected source.

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 7/30/2005.

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

Condition 46: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(b), Subpart JJJJ

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit an initial notification as required in §63.9(b).

Existing facilities must submit the initial notification no later than December 5, 2004.

New and reconstructed affected sources must submit the



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initial notification according to the appropriate schedule in §63.9(b).

For the purpose of Subpart JJJJ, a title V or part 70 permit application may be used in lieu of the initial notification required in §63.9(b).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 47: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(c), Subpart JJJJ

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report must cover the period beginning on the compliance date that is specified for the affected source in §63.3330 and ending on June 30 or December 31, whichever date is the first date following the end of the calendar half immediately following the compliance date. The first compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date.

Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual period from July 1 to December 31. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

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The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS downtime incidents, if applicable, other than downtime associated with zero and span and other calibration checks.
- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 48: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(d), Subpart JJJJ

Item 48.1:

The Compliance Certification activity will be performed for:



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Regulated Contaminant(s):

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Item 48.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Performance Tests as specified in §63.7 and §63.9(e) if the facility is required to conduct a performance test according to Subpart JJJJ. This notification and the site-specific test plan required under §63.7(c)(2) must identify the operating parameters to be monitored to ensure that the capture efficiency of the capture system and the control efficiency of the control device determined during the performance test are maintained. Unless EPA objects to the parameter or requests changes, the facility may consider the parameters approved.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 49: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(e), Subpart JJJJ

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

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Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a Notification of Compliance Status report as required in §63.9(h),

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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Condition 50: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(f), Subpart JJJJ

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit performance test reports as specified in §63.10(d)(2) if the facility is using a control device to comply with the emission standard and the facility has not obtained a waiver from the performance test requirement or the facility is not exempted from this requirement by §63.3360(b). The performance test reports must be submitted as part of the notification of compliance status required in §63.3400(e).

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 51: Compliance Certification

Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3400(g), Subpart JJJJ

Item 51.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 51.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

The facility must submit startup, shutdown, and malfunction reports as specified in §63.10(d)(5), except that the provisions in Subpart A of Part 63 pertaining to startups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

If actions taken by an owner/operator during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not consistent with the procedures specified in the affected source's SSMP required by §63.6(e)(3), the owner/operator must state such information in the report. The startup, shutdown, or malfunction report must consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy and must be submitted to EPA.

Separate startup, shutdown, and malfunction reports are not required if the information is included in the report specified in the semiannual report.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 52: Compliance Certification
Effective between the dates of 12/05/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.3410, Subpart JJJJ

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

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Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner/operator of an affected source must maintain the following records on a monthly basis for at least five years after each occurrence that requires recordkeeping. The latest two years must be kept on site and readily



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available, and the remaining 3 years may be kept off-site or on computer or other means as specified in §63.10(b)(1):

- The records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with Subpart JJJJ, including continuous emission monitor data in accordance with §63.3350(d)
- control device and capture system operating parameter data in accordance with §63.3350(c),(e), and (f)
- organic HAP content data for the purpose of demonstrating compliance in accordance with §63.3360(c)
- volatile matter and coating solids content data for the purpose of demonstrating compliance with §63.3360(d)
- overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with §63.3360(e) and (f)
- material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with §63.3370(b), (c), and (d)
- records specified in §63.10(c) for each continuous monitoring system operated by the owner/operator in accordance with §63.3350(b)
- records of all liquid-liquid material balances performed in accordance with §63.3370.

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 7/30/2005.

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

**Condition 53: EPA Region 2 address.
Effective between the dates of 03/17/2005 and 03/16/2010**

Applicable Federal Requirement: 40CFR 60.4, NSPS Subpart A

Item 53.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: BLR

Item 53.2:

All requests, reports, applications, submittals, and other communications to the Administrator pursuant to this part shall be submitted in duplicate to the following address:

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Director, Division of Enforcement and Compliance Assistance
USEPA Region 2
290 Broadway, 21st Floor
New York, NY 10007-1886

Copies of all correspondence to the administrator pursuant to this part shall also be submitted to the NYSDEC Regional Office issuing this permit (see address at the beginning of this permit) and to the following address:

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

Condition 54: Modification Notification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 60.7(a), NSPS Subpart A

Item 54.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: BLR

Item 54.2:

Any owner or operator subject to 40 CFR Part 60 shall furnish the Administrator and this office with the following information:

- a notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, unless the change is specifically exempted under 40 CFR Part 60. The notice shall be post marked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productivity capability of the facility before and after the change, and the expected completion date of the change. The Administrator and/or this Department may request additional information regarding the change.

Condition 55: Availability of information.
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 60.9, NSPS Subpart A

Item 55.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: BLR



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Item 55.2:

The availability to the public of information provided to, or otherwise obtained by, the Administrator under this part shall be governed by part 2 of this chapter.

Condition 56: Circumvention.

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 60.12, NSPS Subpart A

Item 56.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: BLR

Item 56.2:

No owner or operator subject to the provisions of this part shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.

Condition 57: Modifications.

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 60.14, NSPS Subpart A

Item 57.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: BLR

Item 57.2:

Within 180 days of the completion of any physical or operational change (as defined in section 60.14), compliance with the applicable standards must be achieved.

Condition 58: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: BLR

Item 58.2:

Compliance Certification shall include the following monitoring:



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 59: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: BLR

Item 59.2:

Compliance Certification 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: SEMI-ANNUALLY (CALENDAR)



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 60: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 60.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: BLR

Item 60.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record, for determining compliance with the NSPS requirements.

**** NOTE**** Records shall be maintained for a minimum of five years to achieve compliance with the requirements of Title V.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 61: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 61.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



CAS No: 0NY998-00-0 VOC

Item 61.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The resin kitchen vessels (Process MIX) are operating under a VOC RACT variance. Reduction of VOC emissions below the current level has been demonstrated to the Department to be economically infeasible.

The facility is not required to operate the incinerator (emission source BLRIN) solely for the purpose of controlling VOC emissions from this process. This exception does not apply during times that the resin kitchen vessels are involved in friction materials manufacturing operations that are regulated by 40 CFR 63 Subpart QQQQ.

VOC emissions from this process will be limited by restricting the volatilization of solvents in the resin kitchen mix vessels by maintaining closed vessel lids at all times. The facility must maintain records that verify the position of the vessel lids once during each shift.

Facility must continue to investigate VOC RACT strategies for this process and submit an updated VOC RACT demonstration as part of its Title V renewal application. The demonstration must include an evaluation of the possibility of reformulation, abatement technology and/or process modification.

This process specific RACT variance has been submitted to the EPA for their review, approval and inclusion in the State Implementation Plan (SIP).

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 7/30/2005.

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

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Condition 62: Compliance date for existing solvent mixers.
Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9495(a), Subpart QQQQ

Item 62.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: MIX

Item 62.2:

Existing solvent mixers must comply with each of the requirements for existing sources, codified at 40 CFR Part 63 Subpart QQQQ, no later than October 18, 2005.

Condition 63: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9500(a), Subpart QQQQ

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 63.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each new, reconstructed, or existing large solvent mixer (capacity is greater than 2000 pounds, including friction materials and HAP solvent) at the facility, HAP solvent emissions to the atmosphere must be limited to no more than 30% of that which would otherwise be emitted in the absence of solvent recovery and/or solvent substitution, based on a 7-day block average.

Monitoring Frequency: DAILY

Averaging Method: 7-DAY AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Condition 64: Compliance Certification
Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9505(a), Subpart QQQQ

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 64.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must be in compliance with the emission limitation listed in §63.9500 at all times except during periods of startup, shutdown, or malfunction.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 65: Compliance Certification
Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9505(b), Subpart QQQQ

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

Item 65.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Monitoring Description:

The facility must always operate and maintain the affected source, including air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards, except during periods of startup, shutdown, or malfunction.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 66: Compliance Certification

Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9505(c), Subpart QQQQQ

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must develop and implement a written startup, shutdown, and malfunction plan according to the provisions in §63.6(e)(3).

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 7/30/2005.

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

Condition 67: Compliance Certification

Effective between the dates of 10/18/2005 and 03/16/2010

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Applicable Federal Requirement: 40CFR 63.9515(a), Subpart QQQQ

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 67.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Initial compliance with the emission limitation as stated in §63.9500(a) for large solvent mixers will be demonstrated if the HAP solvent discharge to the atmosphere during the first 7 days after the compliance date, as calculated using the procedures listed in 40CFR63.9520, does not exceed a 7-day block average of 30% of that which would otherwise be emitted in the absence of solvent recovery and/or solvent substitution.

The facility must submit a notification of compliance status containing the results of the initial compliance demonstration according to §63.9535(e).

Parameter Monitored: HAP

Upper Permit Limit: 30 percent by weight

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 7-DAY AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 68: Compliance Certification

Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9530(c), Subpart QQQQ

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



CAS No: 0NY100-00-0 HAP

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must report each instance in which the emission limitations for solvent mixers in §63.9500(a) and (b) were not met. This includes periods of startup, shutdown, or malfunction. These instances are deviations from the emission limitations and must be reported according to the provisions in §63.9540.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 69: Compliance Certification

Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9530(e), Subpart QQQQQ

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 69.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Deviations that occur during periods of startup, shutdown, and malfunction are not violations if the facility demonstrates to the Administrator's satisfaction that the facility was operating in accordance with the startup, shutdown, and malfunction plan. The Administrator will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in §63.6(e).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Condition 70: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9535, Subpart QQQQ

Item 70.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Item 70.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

- (a) Facility must submit all of the notifications in §§ 63.8(f)(4) and 63.9(b), (c), (d), and (h) that apply to facility by the specified dates.
- (b) If facility uses a control technique other than a solvent recovery system and/or solvent substitution, it must comply with the provisions in § 63.9570.
- (c) As specified in § 63.9(b)(2), if facility starts up an affected source before October 18, 2002, it must submit initial notification no later than 120 calendar days after October 18, 2002.
- (d) As specified in § 63.9(b)(3), if facility starts up a new affected source on or after October 18, 2002, it must submit initial notification no later than 120 calendar days after facility becomes subject to this subpart.
- (e) Facility must submit a notification of compliance status according to § 63.9(h)(2)(ii). Facility must submit the notification of compliance status before the close of business on the 30th calendar day following the completion of the initial compliance demonstration.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 71: Compliance Certification



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9540, Subpart QQQQ

Item 71.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 71.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit semiannual compliance reports according to the following schedule:

- the first report must cover the period beginning on the compliance date as specified in §63.9495 and ending on June 30 or December 31, whichever date comes first after the compliance date.
- the first report must be postmarked or delivered no later than July 31 or January 31, whichever date comes first after the first compliance report is due
- each subsequent report must cover the semiannual period from January 1 through June 30 or the semiannual period from July 1 through December 31
- each subsequent report must be postmarked or delivered no later than July 31 or January 31, whichever date comes first after the end of the semiannual reporting period
- for each affected source that is subject to permitting regulations pursuant to 40CFR70 or 71, and if NYSDEC has established dates for submitting semiannual reports pursuant to 40CFR70.6(a)(3)(iii)(A) or 71.6(a)(3)(iii)(A), the facility may submit the first and subsequent compliance reports according to the dates the NYSDEC has established instead of according to the dates above.

Each compliance report must include the following information:

- company name and address
- statement by a responsible official, with the official's name, title, and signature, certifying that, based on

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

- date of report and beginning and ending dates of the reporting period
- if there was a startup, shutdown, or malfunction during the reporting period and the facility took actions consistent with the startup, shutdown, and malfunction plan, the compliance report must include the information in §63.10(d)(5)(i).
- if there were no deviations from the emission limitations for solvent mixers in §63.9500(a) and (b), a statement that there were no deviations from the emission limitations during the reporting period
- if there were no periods during which a monitoring system was out-of-control as specified in §63.8(c)(7), a statement that there were no periods during which a monitoring system was out-of-control during the reporting period

For each deviation from an emission limitation occurring at an affected source, the following information must be included in the semiannual report:

- the total operating time of each affected source during the reporting period
- information on the number, duration, and cause of deviations (including unknown cause, if applicable), and the corrective action taken

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 72: Compliance Certification
Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9540(d), Subpart QQQQ

Item 72.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Regulated Contaminant(s):
CAS No: 0NY100-00-0 HAP

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Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Item 72.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

If the facility had a startup, shutdown, or malfunction during the semiannual period that was not consistent with the startup, shutdown, or malfunction plan, the facility must submit an immediate startup, shutdown, malfunction report according to the requirements in §63.10(d)(5)(ii).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 73: Compliance Certification

Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9545, Subpart QQQQQ

Item 73.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 73.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep the following records:

- a copy of each notification and report that was submitted to comply with Subpart QQQQQ, including all documentation supporting any initial notification or notification of compliance status that was submitted, according to the requirements in §63.10(b)(2)(xiv)
- the records in §63.6(e)(3)(iii)-(v) related to startup, shutdown, or malfunction
- the records required in §63.9525 to show proper operation and maintenance of the weight measurement device



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

- the records required in §63.9530 to show continuous compliance with the emission limitations for solvent mixers in §63.9500(a) and (b).

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 7/30/2005.

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

Condition 74: Compliance Certification
Effective between the dates of 10/18/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9550, Subpart QQQQ

Item 74.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 74.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must keep the appropriate records in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Each record must be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on site for at least 2 years after the date of each occurrence, measurement, etc. and may be kept offsite for the remaining 3 years.

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 7/30/2005.

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

Condition 75: Alternative compliance requirements.



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 40CFR 63.9570, Subpart QQQQ

Item 75.1:

This Condition applies to Emission Unit: 1-SVSAT
Process: MIX

Item 75.2:

(a) If the facility uses a control technique other than a solvent recovery system and/or solvent substitution, it may request approval to use an alternative method of demonstrating compliance with the emission limitations in § 63.9500(a) and (b) according to the procedures in this section.

(b) The facility can request approval to use an alternative method of demonstrating compliance in the initial notification for existing sources, the notification of construction or reconstruction for new sources, or at any time.

(c) The facility must submit a description of the proposed testing, monitoring, recordkeeping, and reporting that will be used and the proposed basis for demonstrating compliance.

(1) If the facility has not previously performed testing, it must submit a proposed test plan. If the facility is seeking permission to use an alternative method of compliance based on previously performed testing, it must submit the results of testing, a description of the procedures followed in testing, and a description of pertinent conditions during testing.

(2) The facility must submit a monitoring plan that includes a description of the control technique, test results verifying the performance of the control technique, the appropriate operating parameters that will be monitored, and the frequency of measuring and recording to establish continuous compliance with the emission limitations in § 63.9500(a) and (b). The facility must also include the proposed performance specifications and quality assurance procedures for the monitors. The monitoring plan is subject to the Administrator's approval. The facility must install, calibrate, operate, and maintain the monitors in accordance with the monitoring plan approved by the Administrator.

(d) Use of the alternative method of demonstrating compliance must not begin until approval is granted by the Administrator.

Condition 76: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 212.4(b)

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT Emission Point: M0001

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

CAS No: 000050-00-0 FORMALDEHYDE

Item 76.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In order to reduce the ambient air quality impacts of formaldehyde from this facility the stack height of emission point M0001 shall be raised to a minimum of 95 feet by September 1, 2005.

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 77: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT Emission Point: M0001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 77.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

This stationary combustion installation shall not exhibit greater than 20 percent opacity (six minute average), except for one six-minute period per hour of not more than 27 percent opacity. Since this is a natural gas fired combustion installation no opacity is anticipated and compliance testing will be performed at the request of the DEC or at the discretion of the facility owner.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA METHOD 9



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 78: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 228.5(f)

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT Emission Point: M0001

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner and/or operator of a surface coating process must follow notification requirements, protocol requirements and test procedures of Part 202 of this Title for testing and monitoring. Depending upon conditions at a test site, one of the following test methods from Appendix A of 40 CFR 60 (see Table 1, section 200.9 of this Title) must be used when measuring VOC concentrations of a gas stream at the inlet and outlet of a control device to determine the destruction and/or removal efficiency:

(1) Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography;

(2) Method 25, Determination of Total Gaseous Organic Emissions as Carbon; or

(3) Method 25A, Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer.



New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (ANNIVERSARY)

Initial Report Due: 10/16/2005 for the period 03/17/2005 through 09/16/2005

Condition 79: Compliance Certification
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable Federal Requirement: 6NYCRR 212.4(c)

Item 79.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-TANKS

Item 79.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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

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

Additionally, the permittee will immediately investigate any instance where there is cause to believe that particulate emissions above 0.05 gr/dscf are occurring or have occurred from a process source. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. During these instances the



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permittee shall determine the cause, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the Department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 80: Compliance Certification

Effective between the dates of 03/17/2005 and 03/16/2010

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

Item 80.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-TANKS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 80.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The methanol storage tanks are operating under a VOC RACT variance. Reduction of VOC emissions below the current level has been demonstrated to the Department to be economically infeasible.

VOC emissions from this emission unit will be limited by restricting the methanol throughput of the tanks (Emission points: TANK1 and TANK2) to 2,500,000 pounds/year.

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Facility must maintain records that verify the throughput of the methanol tanks on a monthly basis. Any increase in throughput beyond this limit will require the facility to submit a VOC RACT demonstration that addresses RACT options at the higher methanol throughput rate.

Facility must continue to investigate VOC RACT strategies for this emission unit and submit an updated VOC RACT demonstration as part of its Title V renewal application. The demonstration must include an evaluation of the possibility of reformulation, abatement technology and/or process modification.

This process specific RACT variance has been submitted to the EPA for their review, approval and inclusion in the State Implementation Plan (SIP).

Work Practice Type: PROCESS MATERIAL THRUPUT
Process Material: VOLATILE ORGANIC LIQUID
Upper Permit Limit: 2500000 pounds per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2005.
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 81: Contaminant List
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: ECL 19-0301

Item 81.1:

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



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

CAS No: 000050-00-0
Name: FORMALDEHYDE

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

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

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

Condition 82: Unavoidable noncompliance and violations
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: 6NYCRR 201-1.4

Item 82.1:

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.



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(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 83: Capping Monitoring Condition
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: 6NYCRR 201-7.2(c)

Item 83.1:

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 212.4(b)

Item 83.2:

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

Item 83.3:

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 83.4:

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 83.5:



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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 83.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 83.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Use of formaldehyde at this facility shall not exceed 10,000 pounds during any 12 month period. The facility shall maintain records that quantify the amount of formaldehyde contained in each coating and ink applied (emission unit 1-SVSAT) and the amount of formaldehyde added at the wet end of the paper machines (emission unit 1-PAPER) during each month. These two values shall be summed to give the total facility formaldehyde usage for each month.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: FORMALDEHYDE

Upper Permit Limit: 10000 pounds per year

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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

Condition 84: Air pollution prohibited

Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: 6NYCRR 211.2

Item 84.1:

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



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particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 85: Emission Unit Permissible Emissions
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: 6NYCRR 201-7.2(c)

Item 85.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 1-SVSAT

CAS No: 0NY998-00-0

Name: VOC

PTE(s): 72,000 pounds per year

Condition 86: Capping Monitoring Condition
Effective between the dates of 03/17/2005 and 03/16/2010

Applicable State Requirement: 6NYCRR 201-7.2(c)

Item 86.1:

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 231-2.2(d)(3)

Item 86.2:

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

Item 86.3:

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 86.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an



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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 86.5:

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 86.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 86.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Emissions of volatile organic compounds (VOC) from emission unit 1-SVSAT shall remain less than 36 tons during any 12 month period. The facility shall maintain records that quantify the amount of each coating and ink applied, the VOC content of each coating and ink as applied, and the quantity and VOC content of all solvents utilized in the mix tanks. The facility will also maintain a report of the latest emissions test showing the capture and control efficiency attained at emission unit 1-SVSAT. The above information will be used to calculate the emission unit VOC emissions during each month.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: VOC's

Upper Permit Limit: 36 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2005.

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