



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 6-2218-00017/00009
Effective Date: 04/28/2010 Expiration Date: 04/27/2015

Permit Issued To: KNOWLTON TECHNOLOGIES LLC
213 FACTORY ST
WATERTOWN, NY 13601

Contact: FREDERICK G RUDMANN
KNOWLTON TECHNOLOGIES LLC
213 FACTORY ST
WATERTOWN, NY 13601
(315) 782-0600

Facility: KNOWLTON TECHNOLOGIES LLC
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: LAWRENCE R AMBEAU
NYSDEC - STATE OFFICE BLDG
317 WASHINGTON ST
WATERTOWN, NY 13601

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

- Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS



DEC GENERAL CONDITIONS

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

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



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

Item 4.1:

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

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

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

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

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street
Watertown, NY 13601-3787
(315) 785-2245

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

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213 FACTORY ST
WATERTOWN, NY 13601

Facility: KNOWLTON TECHNOLOGIES LLC
213 FACTORY ST
WATERTOWN, NY 13601

Authorized Activity By Standard Industrial Classification Code:
2621 - PAPER MILLS EXC BUILDING PAPER
2672 - PAPER COATED AND LAMINATED, NEC

Permit Effective Date: 04/28/2010

Permit Expiration Date: 04/27/2015



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.5 (a) (7): Fees
- 3 6 NYCRR 201-6.5 (c): Recordkeeping and reporting of compliance monitoring
- 4 6 NYCRR 201-6.5 (c) (2): Monitoring, Related Recordkeeping, and Reporting Requirements.
- 5 6 NYCRR 201-6.5 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.5 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 13 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 14 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 15 6 NYCRR 201-6.5 (a) (4): Standard Requirement - Provide Information
- 16 6 NYCRR 201-6.5 (a) (8): General Condition - Right to Inspect
- 17 6 NYCRR 201-6.5 (d) (5): Standard Requirements - Progress Reports
- 18 6 NYCRR 201-6.5 (f) (6): Off Permit Changes
- 19 6 NYCRR 202-1.1: Required Emissions Tests
- 20 6 NYCRR 211.3: Visible Emissions Limited
- 21 40 CFR Part 68: Accidental release provisions.
- 22 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 23 6 NYCRR Subpart 201-6: Emission Unit Definition
- 24 6 NYCRR 201-6.5 (g): Non Applicable requirements
- *25 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 26 6 NYCRR 212.6 (a): Compliance Certification
- 27 6 NYCRR 228.1 (d): Will remain subject
- 28 6 NYCRR 228.2: Compliance Certification
- 29 6 NYCRR 228.5 (a): Compliance Certification
- 30 6 NYCRR 228.5 (d): Compliance Certification
- 31 6 NYCRR 228.6 (a): Prohibition of Sale
- 32 6 NYCRR 228.10: Compliance Certification

Emission Unit Level

- 33 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 34 6 NYCRR Subpart 201-6: Process Definition By Emission Unit
- 35 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

EU=1-AQSAT

- 36 6 NYCRR 228.5 (b): Compliance Certification
- 37 6 NYCRR 228.7: Compliance Certification
- 38 40CFR 63, Subpart A: NESHAP General Provisions

EU=1-AQSAT,EP=LAM01



39 6 NYCRR 228.4: Compliance Certification

EU=1-PAPER

40 6 NYCRR 212.4 (c): Compliance Certification

EU=1-PAPER,Proc=PMS

41 6 NYCRR 212.4 (a): Compliance Certification

EU=1-SVSAT

*42 6 NYCRR Subpart 201-7: Capping Monitoring Condition

43 6 NYCRR 228.3 (b): Compliance Certification

44 6 NYCRR 228.3 (b): Compliance Certification

45 6 NYCRR 228.3 (b): Compliance Certification

46 40CFR 63, Subpart A: NESHAP General Provisions

47 40CFR 63.3320(b)(1), Subpart JJJJ: Compliance Certification

48 40CFR 63.3321(a), Subpart JJJJ: Compliance Certification

49 40CFR 63.3330(a), Subpart JJJJ: Compliance date for existing affected sources.

50 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification

51 40CFR 63.3350(e), Subpart JJJJ: Compliance Certification

52 40CFR 63.3350(f), Subpart JJJJ: Compliance Certification

53 40CFR 63.3360(e), Subpart JJJJ: Compliance Certification

54 40CFR 63.3360(e)(1), Subpart JJJJ: Compliance Certification

55 40CFR 63.3360(e)(2), Subpart JJJJ: Recording of process information during performance test.

56 40CFR 63.3360(e)(3)(i), Subpart JJJJ: Compliance Certification

57 40CFR 63.3360(f), Subpart JJJJ: Compliance Certification

58 40CFR 63.3360(g), Subpart JJJJ: Determination of volatile matter retained in coated web or otherwise not emitted to the atmosphere

59 40CFR 63.3370(e), Subpart JJJJ: Compliance Certification

60 40CFR 63.3370(k)(1), Subpart JJJJ: Compliance Certification

61 40CFR 63.3370(k)(2)(i), Subpart JJJJ: Compliance Certification

62 40CFR 63.3370(k)(3)(i), Subpart JJJJ: Compliance Certification

63 40CFR 63.3400(b), Subpart JJJJ: Compliance Certification

64 40CFR 63.3400(c), Subpart JJJJ: Compliance Certification

65 40CFR 63.3400(d), Subpart JJJJ: Compliance Certification

66 40CFR 63.3400(e), Subpart JJJJ: Compliance Certification

67 40CFR 63.3400(f), Subpart JJJJ: Compliance Certification

68 40CFR 63.3400(g), Subpart JJJJ: Compliance Certification

69 40CFR 63.3410, Subpart JJJJ: Compliance Certification

EU=1-SVSAT,Proc=BLR

70 40CFR 60.4, NSPS Subpart A: EPA Region 2 address.

71 40CFR 60.7(a), NSPS Subpart A: Modification Notification

72 40CFR 60.9, NSPS Subpart A: Availability of information.

73 40CFR 60.12, NSPS Subpart A: Circumvention.

74 40CFR 60.14, NSPS Subpart A: Modifications.

75 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Certification

76 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Certification

77 40CFR 60.48c(i), NSPS Subpart Dc: Compliance Certification



EU=1-SVSAT,Proc=MIX

- 78 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification
- 79 40CFR 63.9495(a), Subpart QQQQQ: Compliance date for existing solvent mixers.
- 80 40CFR 63.9500(a), Subpart QQQQQ: Compliance Certification
- 81 40CFR 63.9505(a), Subpart QQQQQ: Compliance Certification
- 82 40CFR 63.9505(b), Subpart QQQQQ: Compliance Certification
- 83 40CFR 63.9505(c), Subpart QQQQQ: Compliance Certification
- 84 40CFR 63.9515(a), Subpart QQQQQ: Compliance Certification
- 85 40CFR 63.9530(c), Subpart QQQQQ: Compliance Certification
- 86 40CFR 63.9530(e), Subpart QQQQQ: Compliance Certification
- 87 40CFR 63.9535, Subpart QQQQQ: Compliance Certification
- 88 40CFR 63.9540, Subpart QQQQQ: Compliance Certification
- 89 40CFR 63.9540(d), Subpart QQQQQ: Compliance Certification
- 90 40CFR 63.9545, Subpart QQQQQ: Compliance Certification
- 91 40CFR 63.9550, Subpart QQQQQ: Compliance Certification
- 92 40CFR 63.9570, Subpart QQQQQ: Alternative compliance requirements.

EU=1-SVSAT,EP=M0001

- 93 6 NYCRR 212.4 (b): Compliance Certification
- 94 6 NYCRR 227-1.3 (a): Compliance Certification
- 95 6 NYCRR 228.5 (f): Compliance Certification

EU=1-TANKS

- 96 6 NYCRR 212.4 (c): Compliance Certification
- 97 6 NYCRR 212.10 (c) (4) (iii): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 98 ECL 19-0301: Contaminant List
- 99 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 100 6 NYCRR 211.2: Air pollution prohibited

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR 201-6.5 (i)

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is



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

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

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

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

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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



(NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6 (b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 1: Acceptable Ambient Air Quality
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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

Condition 2: Fees
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 2.1:

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

Condition 3: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 3.1:



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

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

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

Condition 4: Monitoring, Related Recordkeeping, and Reporting Requirements.

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 4.1:

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

Condition 5: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Submit reports of any required monitoring at a minimum



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

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

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A



written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

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

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

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

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2010.
Subsequent reports are due every 6 calendar month(s).



Condition 6: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 6.1:

The Compliance Certification activity will be performed for the Facility.

Item 6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

- i. Compliance certifications shall contain:
 - the identification of each term or condition of the permit that is the basis of the certification;
 - the compliance status;
 - whether compliance was continuous or intermittent;
 - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
 - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
 - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.
- 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

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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 1/30/2011.
Subsequent reports are due on the same day each year

Condition 7: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 202-2.1

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 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
 - (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 9: Open Fires - Prohibitions
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 215.2

Item 9.1:

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item 9.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by



police or other public safety organization.

(i) Prescribed burns performed according to Part 194 of this Title.

(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 10: Maintenance of Equipment
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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

Condition 11: Recycling and Salvage
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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

Condition 12: Prohibition of Reintroduction of Collected Contaminants to the air



Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 12.1:

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

Condition 13: Exempt Sources - Proof of Eligibility
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 13.1:

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

Condition 14: Trivial Sources - Proof of Eligibility
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 14.1:

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

Condition 15: Standard Requirement - Provide Information
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (4)

Item 15.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.



Condition 16: General Condition - Right to Inspect
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 201-6.5 (a) (8)

Item 16.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

- (i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and
- (iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 17: Standard Requirements - Progress Reports
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 201-6.5 (d) (5)

Item 17.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 18: Off Permit Changes
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 18.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit

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

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

Condition 22: Recycling and Emissions Reduction
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 82, Subpart F

Item 22.1:

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

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 23: Emission Unit Definition
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 23.1:

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

Emission Unit: 1-AQSAT

Emission Unit Description:

This emission unit consists of the glue laminator (gllam). Emissions vent from EP LAM01.

Building(s): BBISL

Item 23.2:

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 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 23.3:

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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 23.4:

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 24: Non Applicable requirements

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 24.1:

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

6 NYCRR 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).

40 CFR Part 64

Emission Unit: 1SVSAT



Condition 28: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement: 6 NYCRR 228.2

Item 28.1:

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 28.2:

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

(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 29: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.5 (a)

Item 29.1:

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 29.2:

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 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 30: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.5 (d)

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Item 30.1:

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 30.2:

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 31: Prohibition of Sale

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.6 (a)

Item 31.1:

(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 32: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.10



Item 32.1:

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 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

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

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

All associated coating line work area(s) within the



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

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

Monitoring Frequency: DAILY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

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

Condition 33: Emission Point Definition By Emission Unit
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 33.1:

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

Emission Unit: 1-AQSAT
Emission Point: LAM01
Height (ft.): 19 Diameter (in.): 8 Building: BBISL

Item 33.2:

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

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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 33.3:

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 33.4:

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

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 34: Process Definition By Emission Unit
Effective between the dates of 04/28/2010 and 04/27/2015**

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 34.1:

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 34.2:



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

Emission Source/Control: PAP03 - Process

Item 34.3:

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 34.4:

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 34.5:

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
Design Capacity: 53.6 million British thermal units

Emission Source/Control: MIXVS - Process

Item 34.6:

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 34.7:

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 34.8:

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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 35: Emission Unit Permissible Emissions
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 35.1:

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 36: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.5 (b)

Item 36.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 36.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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,

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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 37: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.7

Item 37.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT

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

Item 37.2:

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 7/30/2010.

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

Condition 38: NESHAP General Provisions
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63, Subpart A

Item 38.1:



This Condition applies to Emission Unit: 1-AQSAT

Item 38.2:

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 39: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.4

Item 39.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-AQSAT

Emission Point: LAM01

Item 39.2:

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.

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 7/30/2010.

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

Condition 40: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 40.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER

Item 40.2:

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

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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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 41: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 212.4 (a)

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER
Process: PMS

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC
CAS No: 0NY100-00-0 HAP

Item 41.2:

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 7/30/2010.

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

Condition 42: Capping Monitoring Condition
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 42.1:

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

6 NYCRR 231-2.2 (d) (3)

Item 42.2:

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

Item 42.3:

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 42.4:

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 42.5:

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 42.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 42.7:

Compliance Certification 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 7/30/2010.

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

Condition 43: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.3 (b)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 43.2:

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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 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 1425 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 (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2010.

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

Condition 44: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.3 (b)

Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 44.2:

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.

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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
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 45: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.3 (b)

Item 45.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 45.2:
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 46: NESHAP General Provisions
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63, Subpart A

Item 46.1:
This Condition applies to Emission Unit: 1-SVSAT

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Item 46.2:

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 47: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63.3320(b)(1), 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 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 7/30/2010.

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

Condition 48: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 48.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 48.2:

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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 7/30/2010.

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

**Condition 49: Compliance date for existing affected sources.
Effective between the dates of 04/28/2010 and 04/27/2015**

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

Item 49.1:

This Condition applies to Emission Unit: 1-SVSAT

Item 49.2:

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 50: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015**

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

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 50.2:

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 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: 1425 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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 51: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement: 40CFR 63.3350(e), 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: 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 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: 774 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 7/30/2010.

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

Condition 52: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 52.2:

Compliance Certification shall include the following monitoring:

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 7/30/2010.

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

Condition 53: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 53.2:

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 7/30/2010.

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

Condition 54: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 54.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 54.2:

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 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)).

(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 30 days after the reporting period.
The initial report is due 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

**Condition 55: Recording of process information during performance test.
Effective between the dates of 04/28/2010 and 04/27/2015**

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

Item 55.1:
This Condition applies to Emission Unit: 1-SVSAT



Item 55.2:

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

Condition 56: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 56.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 56.2:

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: 1425 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 7/30/2010.

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

Condition 57: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 57.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 57.2:

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 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.

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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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 58: Determination of volatile matter retained in coated web or otherwise not emitted to the atmosphere
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 58.1:

This Condition applies to Emission Unit: 1-SVSAT

Item 58.2:

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 59: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 59.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 59.2:

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



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 7/30/2010.

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

Condition 61: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 61.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 61.2:
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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 62: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 62.1:
The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Item 62.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 63: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015



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

Item 63.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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:

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 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 64: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 64.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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 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.

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.

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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2010.

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

Condition 65: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 65.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

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 66: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 67: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 67.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 67.2:

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 68: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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

Item 68.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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 69: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63.3410, Subpart JJJJ

Item 69.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

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:

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 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 7/30/2010.

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

**Condition 70: EPA Region 2 address.
Effective between the dates of 04/28/2010 and 04/27/2015**

Applicable Federal Requirement:40CFR 60.4, NSPS Subpart A

Item 70.1:

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

Item 70.2:

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

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

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Condition 73: Circumvention.

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 60.12, NSPS Subpart A

Item 73.1:

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

Item 73.2:

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 74: Modifications.

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 60.14, NSPS Subpart A

Item 74.1:

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

Item 74.2:

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 75: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: BLR

Item 75.2:

Compliance Certification shall include the following monitoring:

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

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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 76: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: BLR

Item 76.2:

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)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2010.

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

Condition 77: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 77.1:

The Compliance Certification activity will be performed for:

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Process: BLR

Item 77.2:

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 7/30/2010.

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

Condition 78: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

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 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

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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 7/30/2010.

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

**Condition 79: Compliance date for existing solvent mixers.
Effective between the dates of 04/28/2010 and 04/27/2015**

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

Item 79.1:

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

Item 79.2:

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 80: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015**

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

Item 80.1:

The Compliance Certification activity will be performed for:

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Facility DEC ID: 6221800017



Emission Unit: 1-SVSAT
Process: MIX

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

Item 80.2:

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 7/30/2010.

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

Condition 81: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 81.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

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

Item 81.2:

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.

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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 7/30/2010.

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

Condition 84: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 84.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 84.2:

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 85: Compliance Certification

New York State Department of Environmental Conservation

Permit ID: 6-2218-00017/00009

Facility DEC ID: 6221800017



Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 85.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

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

Item 85.2:

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 86: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 86.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

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

Item 86.2:

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

Condition 87: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63.9535, Subpart QQQQQ

Item 87.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

Item 87.2:

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 88: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement: 40CFR 63.9540, Subpart QQQQ

Item 88.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 88.2:

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 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 7/30/2010.

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

Condition 89: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 89.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 89.2:

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

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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 90: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63.9545, Subpart QQQQQ

Item 90.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT
Process: MIX

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

Item 90.2:

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
- 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 7/30/2010.

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

Condition 91: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015



Applicable Federal Requirement:40CFR 63.9550, Subpart QQQQ

Item 91.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-SVSAT

Process: MIX

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 91.2:

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 7/30/2010.

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

Condition 92: Alternative compliance requirements.

Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:40CFR 63.9570, Subpart QQQQ

Item 92.1:

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

Item 92.2:

(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.



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

Item 94.1:

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 94.2:

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
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 7/30/2010.
Subsequent reports are due every 6 calendar month(s).

Condition 95: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement:6 NYCRR 228.5 (f)

Item 95.1:

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 95.2:

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.

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 7/30/2010.

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

Condition 96: Compliance Certification
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 96.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-TANKS

Item 96.2:

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 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 7/30/2010.

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

Condition 97: Compliance Certification

Effective between the dates of 04/28/2010 and 04/27/2015

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

Item 97.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-TANKS

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



Item 97.2:

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. 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 THROUGHPUT

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 7/30/2010.

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 98: Contaminant List
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable State Requirement:ECL 19-0301

Item 98.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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Name: FORMALDEHYDE

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Facility DEC ID: 6221800017



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 100: Air pollution prohibited
Effective between the dates of 04/28/2010 and 04/27/2015

Applicable State Requirement:6 NYCRR 211.2

Item 100.1:

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

