



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2226-00120/00011
Mod 0 Effective Date: 11/01/2001 Expiration Date: No expiration date.
Mod 1 Effective Date: 01/19/2010 Expiration Date: No expiration date.

Permit Issued To: FIBERMARK NORTH AMERICA INC
161 WELLINGTON DR
PO BOX 489
BRATTLEBORO, VT 05302

Contact: TIMOTHY S SHEAR
FIBERMARK NORTH AMERICA INC
101 BRIDGE ST
BROWNVILLE, NY 13615
(315) 782-5800

Facility: FIBERMARK - BROWNVILLE
101 BRIDGE STREET
BROWNVILLE, NY 13615

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
 - Applications for Permit Renewals and Modifications
 - Permit Modifications, Suspensions, and Revocations by the Department

Facility Level

- Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS
- Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 1-1: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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 1-1.3:

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



Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-2.1:

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

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

Condition 3: Applications for Permit Renewals and Modifications

Applicable State Requirement: 6 NYCRR 621.13 (a)

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.

Condition 4: Permit Modifications, Suspensions, and Revocations by the Department

Applicable State Requirement: 6 NYCRR 621.14

Item 4.1:

The Department reserves the right to modify, suspend, or revoke this permit. The grounds for modification, suspension or revocation include:

- a) the scope of the permitted activity is exceeded or a violation of any condition of the permit or provisions of the ECL and pertinent regulations is found;
- b) the permit was obtained by misrepresentation or failure to disclose relevant facts;
- c) new material information is discovered; or
- d) environmental conditions, relevant technology, or applicable law or regulation have materially changed since the permit was issued.

**** Facility Level ****

Condition 5: Submission of Applications for Permit Modification or Renewal -REGION 6 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.5 (a)



Item 5.1:

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

Condition 1-3: Submission of application for permit modification or renewal-REGION 6

HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 1-3.1:

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: 6-2226-00120/00011

Facility DEC ID: 6222600120



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: FIBERMARK NORTH AMERICA INC
161 WELLINGTON DR
PO BOX 489
BRATTLEBORO, VT 05302

Facility: FIBERMARK - BROWNVILLE
101 BRIDGE STREET
BROWNVILLE, NY 13615

Authorized Activity By Standard Industrial Classification Code:
2631 - PAPERBOARD MILLS

Mod 0 Permit Effective Date: 11/01/2001
date.

Permit Expiration Date: No expiration

Mod 1 Permit Effective Date: 01/19/2010
date.

Permit Expiration Date: No expiration



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1-1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 1-2 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
- 19 6 NYCRR Part 215: Open Fires Prohibited at Industrial and Commercial Sites
- 3 6 NYCRR 200.7: Maintenance of equipment
- 1-3 6 NYCRR 200.7: Maintenance of Equipment
- 1-4 6 NYCRR 201-1.7: Recycling and Salvage
- 1-5 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 1-6 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 1-7 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 17 6 NYCRR 202-1.1: Required emissions tests
- 1-8 6 NYCRR 202-1.1: Required Emissions Tests
- 1-9 6 NYCRR 211.3: Visible Emissions Limited
- 18 6 NYCRR 211.3: Visible emissions limited.
- 1 6 NYCRR 200.5: Sealing
- 2 6 NYCRR 200.6: Acceptable ambient air quality
- 4 6 NYCRR 201-1.2: Unpermitted Emission Sources
- 9 6 NYCRR 201-1.10 (a): Public Access to Recordkeeping
- 1-10 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *1-11 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-12 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-13 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-14 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 20 6 NYCRR 228.1 (g): Once in, always in

Emission Unit Level

EU=1-BOILR

- 1-15 6 NYCRR 225-1.8 (a): Compliance Demonstration
- 21 6 NYCRR 225-1.8 (a): Compliance Demonstration
- 22 6 NYCRR 227-1.3 (a): Compliance Demonstration

EU=2-PRCSS

- 23 6 NYCRR 228.3 (a): volatile organic compound emission control requirements
- 24 6 NYCRR 228.3 (d) (7): noncompliance reporting
- 25 6 NYCRR 228.4: opacity - <20%
- 26 6 NYCRR 228.5 (d): samples
- 27 6 NYCRR 228.6 (a): prohibition of sale or specification
- 28 6 NYCRR 228.7: Compliance Demonstration
- 29 6 NYCRR 228.10: Handling, storage and disposal of volatile organic compounds

EU=2-PRCSS,Proc=002

- 30 6 NYCRR 228.5 (b): method 24 40 CFR 60



STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 1-16 ECL 19-0301: Contaminant List
- 1-17 6 NYCRR 201-1.4: Unavoidable noncompliance and violations
- 31 6 NYCRR Subpart 201-5: General Provisions
- 32 6 NYCRR Subpart 201-5: Permit Exclusion Provisions
- 33 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-18 6 NYCRR 211.2: Air pollution prohibited
- 35 6 NYCRR 211.2: Air pollution prohibited

Emission Unit Level

- 36 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 37 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=1-BOILR

- 38 6 NYCRR 225-1.2 (a) (2): Compliance Demonstration

EU=2-PRCSS

- 39 6 NYCRR 212.3 (b): Existing sources - 212.3(b) particulate matter standard.
- 40 6 NYCRR 212.5 (f): Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
- 41 6 NYCRR 212.6 (a): Compliance Demonstration
- 42 6 NYCRR 212.11 (a): Sampling and Monitoring

NOTE: * preceding the condition number indicates capping.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

- (a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.
- (b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Emergency Defense - 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 F: Recycling and Salvage - 6 NYCRR 201-1.7

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

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

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

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

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

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

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

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



An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item K: Visible Emissions Limited - 6 NYCRR 211.3

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

Item L: Open Fires - 6 NYCRR Part 215

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

Item M: Permit Exclusion - ECL 19-0305

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

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

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



Condition 1-3: Maintenance of Equipment
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.7

Item 1-3.1:

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 1-4: Recycling and Salvage
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 1-4.1:

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 1-5: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 1-5.1:

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 1-6: Exempt Sources - Proof of Eligibility
Effective between the dates of 01/19/2010 and Permit Expiration Date

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

Item 1-6.1:

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 1-7: Trivial Sources - Proof of Eligibility
Effective between the dates of 01/19/2010 and Permit Expiration Date

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



Item 18.1:

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

Condition 1: Sealing
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.5

Item 1.1:

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

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

(c) Unless authorized by the commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section

Condition 2: Acceptable ambient air quality
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 200.6

Item 2.1:

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 4: Unpermitted Emission Sources
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-1.2

Item 4.1:

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

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

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



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

6 NYCRR Subpart 201-6

Item 1-11.2:

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

Item 1-11.3:

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

Item 1-11.4:

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

Item 1-11.5:

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

Item 1-11.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-11.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility emissions of Volatile Organic Compounds (VOC's) shall not exceed 99,000 pounds per year. The annual rolling total emissions shall be calculated monthly using NYS DEC approved methodology. Reports shall be submitted annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Reports due 30 days after the reporting period.
The initial report is due 10/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-12: Capping Monitoring Condition
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-12.1:

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

6 NYCRR Subpart 201-6

Item 1-12.2:

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

Item 1-12.3:

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

Item 1-12.4:

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

Item 1-12.5:

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

Item 1-12.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-12.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



Monitoring Description:

Facility emissions of Sulfur Dioxide (SO₂) shall not exceed 199,000 pounds per year. The annual rolling total emissions shall be calculated monthly using NYS DEC approved methodology. Reports shall be submitted annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2010.

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

Condition 1-13: Capping Monitoring Condition
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 1-13.1:

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

6 NYCRR Subpart 201-6

Item 1-13.2:

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

Item 1-13.3:

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

Item 1-13.4:

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

Item 1-13.5:

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

Item 1-13.6:

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: ONY100-00-0 HAP

Item 1-13.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
Facility emissions of combined Hazardous Air Pollutants (HAP's) shall not exceed 49,800 pounds per year. The annual rolling total emissions shall be calculated monthly using NYS DEC approved methodology. Reports shall be submitted annually.

Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 10/30/2010.
Subsequent reports are due every 12 calendar month(s).

Condition 1-14: Capping Monitoring Condition
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-14.1:

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

6 NYCRR Subpart 201-6

Item 1-14.2:

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

Item 1-14.3:

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

Item 1-14.4:

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

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-14.5:

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

Item 1-14.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000107-21-1 1,2-ETHANEDIOL

Item 1-14.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission of 1,2 ETHANEDIOL (Ethylene Glycol) shall be limited to 19,000 pounds annually. The annual rolling total emissions shall be calculated monthly using NYS DEC approved methodology. Reports shall be submitted annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/30/2010 for the period 01/19/2010 through 10/31/2010

Condition 20: Once in, always in
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.1 (g)

Item 20.1:

Any coating line subject to the provisions of this Part, will remain subject to these provisions even if the facility annual potential to emit VOC later falls below applicability criteria.

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

Condition 1-15: Compliance Demonstration
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 225-1.8 (a)

Item 1-15.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Emission Unit: 1-BOILR

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sulfur content of the #6 oil combusted in the 25.2 mmBtu/Hr boiler shall not exceed 1.5 percent by weight. Emissions of SO₂ shall be calculated monthly based on supplier certifications of the sulfur content, AP-42 emission factors and fuel usage records. The source owner shall operate and maintain a fuel flow meter to verify fuel usage. The 12 month rolling total emissions of SO₂ shall be reported annually.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/30/2010 for the period 01/19/2010 through 10/31/2010

Condition 21: Compliance Demonstration
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 225-1.8 (a)

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sulfur content of the #6 oil combusted in the 30.9 mmBtu/Hr boiler shall not exceed 1.5 percent by weight. Emissions of SO₂ shall be calculated monthly based on supplier certifications of the sulfur content, AP-42 emission factors and fuel usage records. The source owner shall operate and maintain a fuel flow meter to verify fuel usage. The 12 month rolling total emissions of SO₂ shall be reported annually.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



DESCRIPTION

Reporting Requirements: ANNUALLY (ANNIVERSARY)

Initial Report Due: 11/30/2002 for the period 11/01/2001 through 10/31/2002

Condition 22: Compliance Demonstration
Effective between the dates of 11/01/2001 and Permit Expiration Date

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

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Opacity must be less than 20% (6-minute average) except for one 6-minute period per hour of not more than 27%.

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: volatile organic compound emission control requirements
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.3 (a)

Item 23.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 23.2:

No person shall cause or allow the usage of coatings that exceed the allowable pounds of volatile organic compounds per gallon, minus water and excluded VOC at application, as specified in table 1 and table 2 of Part 228, unless an approved coating system or approved control equipment is utilized or a variance has been granted.

Condition 24: noncompliance reporting
Effective between the dates of 11/01/2001 and Permit Expiration Date



Applicable Federal Requirement:6 NYCRR 228.3 (d) (7)

Item 24.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 24.2:

Any record showing noncompliance with Part 228 shall be reported by sending a copy of the record to the commissioner's representative within 30 days following the occurrence.

Condition 25: opacity - <20%
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.4

Item 25.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 25.2:

The average opacity of emissions to the outdoor atmosphere shall not equal or exceed 20 percent for any consecutive six-minute period.

Condition 26: samples
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.5 (d)

Item 26.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 26.2:

Representatives of the department shall be permitted, during reasonable business hours, to obtain coating samples for the purpose of determining compliance.

Condition 27: prohibition of sale or specification
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.6 (a)

Item 27.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 27.2:

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 of 6NYCRR Part 228 if such use is prohibited. This 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 an affected facility. This prohibition shall not apply to the following:

- (1) coatings utilized at surface coating lines where control equipment has been

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



installed to meet the allowable VOC content limitations specified in tables 1 and 2 of Part 228;

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

(3) coatings utilized at surface coating lines that have been granted variances for reasons of technological and economic feasibility.

Condition 28: Compliance Demonstration
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.7

Item 28.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRCSS

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

Item 28.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Coatings used for the surface coating of paper and other web materials may contain a maximum of 2.9 pounds of volatile organic compounds per gallon of coating (minus water and excluded VOC) 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: Method 24 (40CFR60)

Monitoring Frequency: SINGLE OCCURRENCE

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 29: Handling, storage and disposal of volatile organic compounds
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228.10

Item 29.1:

This Condition applies to Emission Unit: 2-PRCSS



Item 29.2:

No owner or operator of a facility subject to 6NYCRR Part 228 shall:

- (a) use open containers to store or dispose of cloth or paper impregnated with VOC and/or solvents that are used for surface preparation, cleanup, or coating removal;
- (b) store in open containers spent or fresh VOC and/or solvents to be used for surface preparation, cleanup, or coating removal;
- (c) use VOC and/or solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize their evaporation to the atmosphere;
- (d) 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; or
- (e) use open containers to store or dispose of spent surface coatings, spent VOCs and/or solvents.

Condition 30: method 24 40 CFR 60
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228.5 (b)

Item 30.1:

This Condition applies to Emission Unit: 2-PRCSS
Process: 002

Item 30.2:

Acceptable analytical methods for determining the volatile content, water content, density, volume of solids and weight of solids of surface coatings are presented in appendix A, method 24, of 40 CFR 60.



STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 1-16: Contaminant List

Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable State Requirement:ECL 19-0301

Item 1-16.1:

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

CAS No: 000107-21-1
Name: 1,2-ETHANEDIOL

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

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

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

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

Condition 1-17: Unavoidable noncompliance and violations

Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-17.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard



in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superseded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 31: General Provisions

Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 31.1:

This section contains terms and conditions that are not federally enforceable and are not required under the Act or under any of its applicable requirements. Terms and conditions so designated are not subject to the requirements of Section 201-6.4 of Part 201.

Item 31.2:

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.

Item 31.3:

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.



Condition 32: Permit Exclusion Provisions
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 32.1:

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 currently pending or future legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant 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 by the Department and the receipt thereof by the Applicant does not supercede, revoke or rescind an order or modification thereof on consent or determination by the Commissioner issued heretofore by the Department or any of the terms, conditions or requirements contained in such order or modification thereof unless specifically intended by this permit.

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 the right of the Department to bring any future action, or pursue any pending action, either administrative or judicial, to required remediation, contribution for costs incurred or funds expended, for any violations, past, present or future, known or unknown, of applicable federal law, the ECL, or the rules and regulations promulgated thereunder, or conditions contained in any other licenses or permits issued to the Applicant and not addressed in this permit.

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 the right of the Department to pursue any claims for natural resource damages against the Applicant.

Condition 33: Emission Unit Definition
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 33.1(From Mod 1):

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

Emission Unit: 1-BOILR

Emission Unit Description:

This emission unit consists of one 25.2 MMBTU/HR boiler capable of firing either #6 fuel oil or natural gas.

Building(s): MAIN

Item 33.2(From Mod 0):

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

Emission Unit: 2-PRCSS

Emission Unit Description:



Paper Making and Coating Process. The facility manufactures latex saturated and coated paper. Pulp is purchased. Latexes used have trace amounts of HAP's and VOC's, identified in Section III.

The papermaking and saturating process has 5 emission points, P001, P002, P003, P004, P005.

The coating process has 3 emission points, C001 and C002 are drying oven exhausts, 00002 is the exhaust for a Kady Mill, a clay milling piece of equipment.

The HAP of most concern is ethylene glycol. It is present in a pigment used to color the paper in the saturating process. The March 10, 2000 analysis of the finished product indicates that 71% of the ethylene glycol stays with the product. The use of the pigment will be managed as not to exceed 19,000 pounds per year emitted.

All coatings are aqueous and are compliant, having significantly less than 2.9 pounds VOC per gallon of coating. A coating VOC and HAPs report will be completed each year.

Building(s): MAIN

Condition 1-18: Air pollution prohibited
Effective between the dates of 01/19/2010 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 1-18.1:

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

Condition 35: Air pollution prohibited
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.2

Item 35.1:

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



**** Emission Unit Level ****

Condition 36: Emission Point Definition By Emission Unit
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 36.1(From Mod 1):

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

Emission Unit: 1-BOILR

Emission Point: BLR01
 Height (ft.): 45 Diameter (in.): 36
 NYTMN (km.): 4872.2 NYTME (km.): 421.3 Building: MAIN

Emission Point: BLR02
 Height (ft.): 38 Diameter (in.): 30
 NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Item 36.2(From Mod 0):

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

Emission Unit: 2-PRCSS

Emission Point: 00002
 Height (ft.): 27 Diameter (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Emission Point: C0001
 Height (ft.): 27 Diameter (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Emission Point: C0002
 Height (ft.): 27 Diameter (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Emission Point: P0001
 Height (ft.): 35 Length (in.): 34 Width (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.3 Building: MAIN

Emission Point: P0002
 Height (ft.): 32 Length (in.): 34 Width (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.3 Building: MAIN

Emission Point: P0003
 Height (ft.): 34 Length (in.): 34 Width (in.): 23
 NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Emission Point: P0004
 Height (ft.): 35 Length (in.): 26 Width (in.): 20

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN
Emission Point: P0005
Height (ft.): 34 Length (in.): 34 Width (in.): 23
NYTMN (km.): 4872.2 NYTME (km.): 421.2 Building: MAIN

Condition 37: Process Definition By Emission Unit
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 37.1(From Mod 1):

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

Emission Unit: 1-BOILR
Process: 001 Source Classification Code: 1-02-004-04
Process Description:
25.2 Million BTU boiler capable of firing either #6 Fuel Oil or Natural Gas. Boiler produces steam for process (steam heated dryer cans on paper machine) and space heating when needed. Facility will monitor oil consumption and sulfur content of fuel oil as to not exceed 199,000 pounds per year of sulfur dioxide emissions.

Emission Source/Control: 00001 - Combustion
Design Capacity: 25.2 million Btu per hour

Item 37.2(From Mod 0):

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

Emission Unit: 1-BOILR
Process: 003 Source Classification Code: 1-02-006-02
Process Description:
26 Million Btu/hr Natural Gas Boiler. Produces steam for process (steam heated dryer cans on paper machine) and space heating when needed.

Emission Source/Control: 00003 - Combustion
Design Capacity: 26 million Btu per hour

Item 37.3(From Mod 0):

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

Emission Unit: 2-PRCSS
Process: 002 Source Classification Code: 4-02-013-01
Process Description:
Paper making and coating process. The facility manufactures latex saturated and coated paper. Pulp is purchased. Latexes used have trace amounts of HAP's and VOC's, identified in Section III. The papermaking and saturating process has 5 emission points, P001-P005. The coating process has 3 emission points, C001 and C002 are

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



drying oven exhausts, 00002 is the exhaust for the Kady Mill (currently permitted) a clay milling piece of equipment.

Emission Source/Control: PAPER - Process

Emission Source/Control: PCOAT - Process

Condition 38: Compliance Demonstration
Effective between the dates of 11/01/2001 and Permit Expiration Date

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

Item 38.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 38.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 6 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 39: Existing sources - 212.3(b) particulate matter standard.
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 212.3 (b)

Item 39.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 39.2:

In instances where determination of permissible emission rate using process weight is not applicable (see Table 5 of Part 212) and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.15 grains of particulates



per cubic foot of exhaust gas, corrected for dilution air and expressed at standard conditions on a dry gas basis.

Condition 40: Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 212.5 (f)

Item 40.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 40.2:

Owners and/or operators of facilities which have limited the facility's annual potential to emit nitrogen oxides or volatile organic compounds below applicability levels through federally and state enforceable special conditions in permits to construct and/or certificates to operate under the provisions of section 212.10(d) of this Part must maintain annual actual emissions below these limitations. Nitrogen oxide and volatile organic compound emission points at these facilities are not subject to the control requirements in section 212.9(b) of this Part if the emissions are not given an A rating.

Condition 41: Compliance Demonstration
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 212.6 (a)

Item 41.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 2-PRCSS

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 41.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 42: Sampling and Monitoring
Effective between the dates of 11/01/2001 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 212.11 (a)

Item 42.1:

This Condition applies to Emission Unit: 2-PRCSS

Item 42.2:

The owner and/or operator of this facility, if required by the department to conduct stack testing to demonstrate compliance with 6 NYCRR Part 212, must comply with notification requirements and conduct capture efficiency and/or stack testing using acceptable procedures pursuant to 6 NYCRR Part 202.

