



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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 6-2226-00120/00011  
Mod 0 Effective Date: 10/03/2014 Expiration Date: 10/02/2024  
Mod 1 Effective Date: 04/28/2015 Expiration Date: 10/02/2024

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 PO BOX 663  
BROWNVILLE, NY 13615-0663  
(315) 782-5800

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

Description:  
This permit modification is to be issued in order to correct administrative errors in the permit.

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 - REGION 6  
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 \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

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

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

**Item 1.1:**

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

**Item 1.2:**

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

**Item 1.3:**

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

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

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

**Item 2.1:**

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

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

**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

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

**Item 3.2:**

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

**Item 3.3:**

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



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

**Item 4.1:**

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

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

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

**Condition 5: Submission of application for permit modification or renewal-REGION 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: 6-2226-00120/00011

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:  
2672 - PAPER COATED AND LAMINATED, NEC  
2631 - PAPERBOARD MILLS  
9999 - NONCLASSIFIABLE ESTABLISHMENTS

Mod 0 Permit Effective Date: 10/03/2014

Permit Expiration Date: 10/02/2024

Mod 1 Permit Effective Date: 04/28/2015

Permit Expiration Date: 10/02/2024



## LIST OF CONDITIONS

### FEDERALLY ENFORCEABLE CONDITIONS

#### Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 200.7: Maintenance of Equipment
- 3 6 NYCRR 201-1.7: Recycling and Salvage
- 4 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 5 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 6 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 7 6 NYCRR 202-1.1: Required Emissions Tests
- 1-1 6 NYCRR 201-6.1: Compliance Demonstration
- 1-2 6 NYCRR 201-6.1: Compliance Demonstration
- 8 6 NYCRR 201-6.1: Compliance Demonstration
- 11 6 NYCRR 201-6.1: Compliance Demonstration
- 12 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- \*13 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*14 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*15 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- \*16 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 17 6 NYCRR 211.1: Air pollution prohibited
- 18 6 NYCRR 212.3 (b): Compliance Demonstration
- 19 6 NYCRR 212.5 (f): Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants
- 20 6 NYCRR 212.6 (a): Compliance Demonstration
- 21 6 NYCRR 212.11 (a): Sampling and Monitoring
- 22 6 NYCRR 225-1.2 (e): Compliance Demonstration
- 23 6 NYCRR 228-1.4 (d) (3): Compliance Demonstration

#### Emission Unit Level

#### EU=1-BOILR

- 24 6 NYCRR 225-1.2 (e): Compliance Demonstration
- 25 6 NYCRR 227-1.3 (a): Compliance Demonstration

### STATE ONLY ENFORCEABLE CONDITIONS

#### Facility Level

- 26 ECL 19-0301: Contaminant List
- 27 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 28 6 NYCRR Subpart 201-5: Emission Unit Definition
- 29 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 30 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 31 6 NYCRR 211.2: Visible Emissions Limited

#### Emission Unit Level

- 32 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 33 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

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: 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 F: 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 G: 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 H: 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 I: 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 J: Open Fires Prohibitions - 6 NYCRR 215.2**

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

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



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

**FEDERAL APPLICABLE REQUIREMENTS**

**The following conditions are federally enforceable.**

**Condition 1: Acceptable Ambient Air Quality**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**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: Maintenance of Equipment**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 2.1:**

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 3: Recycling and Salvage**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 3.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 4: Prohibition of Reintroduction of Collected Contaminants to the air**



Effective between the dates of 10/03/2014 and 10/02/2024

Applicable Federal Requirement:6 NYCRR 201-1.8

**Item 4.1:**

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 5: Exempt Sources - Proof of Eligibility**

Effective between the dates of 10/03/2014 and 10/02/2024

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

**Item 5.1:**

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

**Condition 6: Trivial Sources - Proof of Eligibility**

Effective between the dates of 10/03/2014 and 10/02/2024

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

**Item 6.1:**

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

**Condition 7: Required Emissions Tests**

Effective between the dates of 10/03/2014 and 10/02/2024

Applicable Federal Requirement:6 NYCRR 202-1.1

**Item 7.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 1-1: Compliance Demonstration**

Effective between the dates of 04/28/2015 and 10/02/2024

Applicable Federal Requirement:6 NYCRR 201-6.1

Replaces Condition(s) 10

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



**Item 1-1.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 1-1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

25.2 Million BTU #6 Oil or 25.2 Million BTU Natural Gas  
boilers. Particulates are calculated using AP-42.

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 1/30/2016.

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

**Condition 1-2:    Compliance Demonstration**  
**Effective between the dates of 04/28/2015 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 201-6.1**

**Replaces Condition(s) 9**

**Item 1-2.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY210-00-0    OXIDES OF NITROGEN

**Item 1-2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

25.2 Million BTU #6 Oil or 25.2 Million BTU Natural Gas  
boilers. Using AP 42 worst case scenario.

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 1/30/2016.

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

**Condition 8:    Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 201-6.1**

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility will report annual coating usage as well as raw material usage of VOC containing raw materials. This report will give worst case scenario for VOC emissions based on MSDS's.

All coatings are aqueous and compliant with 6 NYCRR Part 228-1.4 Table D-2 at significantly less than 0.08 lbs VOC / lbs coating.

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 1/30/2015.

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

**Condition 11:      Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 201-6.1**

**Item 11.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility uses some HAP containing raw materials in both the saturating and coating processes. The facility will report these raw materials and the worst case scenario for HAP's emissions based on MSDS's. One HAP, Ethylene Glycol has the potential to emit > 10 Tons if it's usage were to significantly increase. An analysis was performed on the sheet to determine sheet content of the ethylene glycol. The analysis conducted on 3/10/2000

New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



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 lbs per year emitted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 12: Facility Permissible Emissions
Effective between the dates of 10/03/2014 and 10/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 12.1:

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

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

Table with 4 columns: Frequency, CAS No., Name, PTE. Rows include 1,2-ETHANEDIOL, SULFUR DIOXIDE, TOTAL HAP, and VOC.

Condition 13: Capping Monitoring Condition
Effective between the dates of 10/03/2014 and 10/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 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 13.2:

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



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

**Item 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 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 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 13.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

**Item 13.7:**

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 totally rolling emissions shall be calculated monthly using NYS DEC approved methodology. Reports shall be submitted annually.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 14:      Capping Monitoring Condition**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



**Item 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 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 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 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 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 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 14.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 14.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility emissions of HAP's shall not exceed 49,800 lbs 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



**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

**Condition 15: Capping Monitoring Condition**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 15.1:**

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 201-6.1

**Item 15.2:**

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

**Item 15.3:**

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 15.4:**

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 15.5:**

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 15.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 15.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility emissions of Sulfur Dioxide shall not exceed 199,000 lbs 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 1/30/2015.

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

**Condition 16: Capping Monitoring Condition**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 16.1:**

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 16.2:**

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

**Item 16.3:**

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 16.4:**

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 16.5:**

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 16.6:**



New York State Department of Environmental Conservation

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.15 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 19: Capped sources of VOC and NOx not subject to 212.9(b) for non A-rated contaminants**

**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 212.5 (f)**

**Item 19.1:**

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 operate under the provisions of 6 NYCRR Part 212.10(d) 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 6 NYCRR Part 212.9(b) if the emissions are not given an A rating.

**Condition 20: Compliance Demonstration**

**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 20.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 20.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

The permittee will conduct observations of visible

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 21: Sampling and Monitoring**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 212.11 (a)**

**Item 21.1:**

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.

**Condition 22: Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 225-1.2 (e)**

**Item 22.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 22.2:**

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility will monitor Sulfur content and combustion of # 6 F.O on a 12 month rolling total. This record keeping will be used to restrict the level of Sulfur Dioxide emitted to < 100 TPY. Records shall be submitted annually.

On or after July 01, 2014 the facility will comply with 6 NYCRR 225-1.2(e). No residual oil will be purchased with a Sulfur content greater than 0.50 % by weight. Furthermore, all residual oil fired on or after July 01, 2016 will have a sulfur content less than 0.50 % by weight.

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 1/30/2015.

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

**Condition 23: Compliance Demonstration**

**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 228-1.4 (d) (3)**

**Item 23.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 23.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility will report annual coating usage as well as raw material usage of VOC containing raw materials. This report will give worst case scenario for VOC emissions based on MSDS's.

All coatings are aqueous and compliant with 6 NYCRR Part 228-1.4 Table D-2 at significantly less than 0.08 lbs VOC / lbs coating.

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



The initial report is due 1/30/2015.  
Subsequent reports are due every 12 calendar month(s).

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

**Condition 24: Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable Federal Requirement:6 NYCRR 225-1.2 (e)**

**Item 24.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 24.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The sulfur content of the residual oil fired in the 25.2 MMBTU/hr boiler shall not exceed 0.50% on or after July 01, 2016. Furthermore, residual oil purchased on or after July 01, 2014 will have a sulfur content not to exceed 0.50% by weight. SO<sub>2</sub> shall be calculated monthly based on supplier certifications of the sulfur content, AP-42 emission factors and fuel usage records. The operator shall operate and maintain a fuel flow meter to certify fuel usage. The 12 month rolling total emissions of SO<sub>2</sub> shall be reported annually.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 25: Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-BOILR

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



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

**Item 25.2:**

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 will reserve the right to perform or require the performance of method 9 opacity evaluation as 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



**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: Emergency Defense - 6 NYCRR 201-1.5**

An emergency, as defined by subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the Department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

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

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

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

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

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

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

**Item C: 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 26: Contaminant List  
Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 26.1:**

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

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



Name: TOTAL HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0

Name: VOC

**Condition 27: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 27.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 28: Emission Unit Definition**

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 28.1(From Mod 0):**

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 and one 25.2 MMBTU/hr natural gas fired boiler.

Building(s): MAIN

**Item 28.2(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 6 emission points, P001, P002, P003, P004, P005 and P006.

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 0.08 pounds VOC per gallon of coating. A coating VOC and HAPs report will be completed each year.

Building(s): MAIN

**Condition 29: Renewal deadlines for state facility permits**

**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable State Requirement:6 NYCRR 201-5.2 (c)**

**Item 29.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



expiration for permit renewal purposes.

**Condition 30: Compliance Demonstration**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 30.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 30.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
NYS Dept. of Environmental Conservation  
Region 6  
State Office Building  
317 Washington Ave.  
Watertown, NY 13601

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

**Condition 31: Visible Emissions Limited**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

**Applicable State Requirement:6 NYCRR 211.2**

**Item 31.1:**

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.

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

**Condition 32: Emission Point Definition By Emission Unit**  
**Effective between the dates of 10/03/2014 and 10/02/2024**

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

**Item 32.1(From Mod 0):**

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



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.): 45                      Diameter (in.): 36  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

**Item 32.2(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.): 31                      Length (in.): 20                      Width (in.): 14  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: C0001

Height (ft.): 29                      Diameter (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: C0002

Height (ft.): 27                      Diameter (in.): 22  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: P0001

Height (ft.): 35                      Length (in.): 33                      Width (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.3              Building: MAIN

Emission Point: P0002

Height (ft.): 33                      Length (in.): 33                      Width (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.3              Building: MAIN

Emission Point: P0003

Height (ft.): 32                      Length (in.): 33                      Width (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: P0004

Height (ft.): 34                      Length (in.): 33                      Width (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: P0005

Height (ft.): 35                      Length (in.): 26                      Width (in.): 20  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

Emission Point: P0006

Height (ft.): 34                      Length (in.): 33                      Width (in.): 23  
NYTMN (km.): 4872.2              NYTME (km.): 421.2              Building: MAIN

**New York State Department of Environmental Conservation**

Permit ID: 6-2226-00120/00011

Facility DEC ID: 6222600120



**Condition 33: Process Definition By Emission Unit**  
Effective between the dates of 10/03/2014 and 10/02/2024

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

**Item 33.1(From Mod 0):**

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 33.2(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:  
25.2 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: 25.2 million Btu per hour

**Item 33.3(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 6 emission points, P001-P006. The coating process has 3 emission points, C001 and C002 are 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

