

**New York State Department of Environmental Conservation
Facility DEC ID: 6402600001**



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

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 6-4026-00001/00047
Mod 0 Effective Date: 08/04/2004 Expiration Date: 08/04/2009
Mod 1 Effective Date: 03/16/2007 Expiration Date: 08/04/2009
Mod 2 Effective Date: Expiration Date:

Permit Issued To: NEWTON FALLS FINE PAPER COMPANY LLC
875 CO RTE 60
NEWTON FALLS, NY 13666

Contact: DENNIS R BUNNELL
NEWTON FALLS FINE PAPER COMPANY LLC
875 CO RTE 60
NEWTON FALLS, NY 13666
(315) 848-3321

Facility: NEWTON FALLS PAPER MANUFACTURING PLANT
875 CO RTE 60
NEWTON FALLS, NY 13666

Contact: LEVI DURHAM
NEWTON FALLS PAPER MANUFACTURING PLANT
875 CO RTE 60
NEWTON FALLS, NY 13666
(315) 848-3321

Description:

This application for permit modification is necessary in order to incorporate permit limitations based on EPA review of the facility's PSD determination for the proposed operations at this paper mill now under new ownership. Specifically, the modification proposes to establish an emissions cap for sulfur dioxide emissions of 895 tons per year. This emission limit is 38 tons per year above the 24 month baseline emissions used in the PSD determination for operating years 1997 - 1998.

The facility is also removing emission sources from operation, including #3 & #6 boilers.

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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

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

Authorized Signature: _____ Date: ____ / ____ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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 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 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
Applications for Permit Renewals and Modifications
Permit modifications, suspensions or revocations by the Department
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 ******

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

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301.2(m)

Item 2.1:

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

Condition 2-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6NYCRR 621.11

Item 2-1.1:

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 2-1.2:

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 2-1.3:



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

Condition 3: Applications for Permit Renewals and Modifications
Applicable State Requirement: 6NYCRR 621.13

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the 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 2-2: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6NYCRR 621.13

Item 2-2.1:

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

Item 4.1:

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

- 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;

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

Item 5.1:

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

Condition 2-3: Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS
Applicable State Requirement: 6NYCRR 621.6(a)

Item 2-3.1:

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



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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

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875 CO RTE 60
NEWTON FALLS, NY 13666

Facility: NEWTON FALLS PAPER MANUFACTURING PLANT
875 CO RTE 60
NEWTON FALLS, NY 13666

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

Permit Effective Date:

Permit Expiration Date:



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 2-1 6NYCRR 200.6: Acceptable Ambient Air Quality
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- 2-3 6NYCRR 215: Open Fires Prohibited at Industrial and Commercial Sites
- 2-4 6NYCRR 200.7: Maintenance of Equipment
- 2-5 6NYCRR 201-1.7: Recycling and Salvage
- 2-6 6NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 2-7 6NYCRR 201-3.2(a): Exempt Sources - Proof of Eligibility
- 2-8 6NYCRR 201-3.3(a): Trivial Sources - Proof of Eligibility
- 2-9 6NYCRR 201-6.5(a)(4): Standard Requirement - Provide Information
- 2-10 6NYCRR 201-6.5(a)(8): General Condition - Right to Inspect
- 2-11 6NYCRR 201-6.5(d)(5): Standard Requirements - Progress Reports
- 2-12 6NYCRR 201-6.5(f)(6): Off Permit Changes
- 2-13 6NYCRR 202-1.1: Required Emissions Tests
- 2-14 6NYCRR 211.3: Visible Emissions Limited
- 2 6NYCRR 201-6: Emission Unit Definition
- 2-15 6NYCRR 201-7.2: Facility Permissible Emissions
- *2-16 6NYCRR 201-7.2: Capping Monitoring Condition
- 2-17 6NYCRR 212.4(c): Compliance Certification
- 2-18 6NYCRR 212.6(a): Compliance Certification
- 2-19 6NYCRR 212.6(a): Compliance Certification
- 12 6NYCRR 225-1.2(a)(2): Compliance Certification
- 2-20 6NYCRR 225-1.2(a)(2): Compliance Certification
- 2-21 6NYCRR 225-1.2(a)(2): Compliance Certification
- 2-22 6NYCRR 227-2.4(c)(2): Compliance Certification
- 2-23 6NYCRR 227-2.4(c)(2): Compliance Certification
- 2-24 6NYCRR 227.2(b)(1): Compliance Certification
- 2-25 6NYCRR 227.2(b)(1): Compliance Certification
- 2-26 6NYCRR 228.4: Compliance Certification
- 2-27 6NYCRR 228.7: Compliance Certification
- 13 6NYCRR 228.7: Compliance Certification
- 2-28 40CFR 52.21(r)(6), Subpart A: Compliance Certification
- 2-29 40CFR 52.21(r)(6), Subpart A: Compliance Certification

Emission Unit Level

- 16 6NYCRR 201-6: Emission Point Definition By Emission Unit
- 17 6NYCRR 201-6: Process Definition By Emission Unit
- 2-30 6NYCRR 201-7.2: Process Permissible Emissions

EU=1-OFFMC

- 18 6NYCRR 228.4: Compliance Certification



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EU=1-PAPER

19 6NYCRR 212.6(a): Compliance Certification

EU=1-PAPER,Proc=PM3,ES=PAPM3

*2-31 6NYCRR 201-7.2: Capping Monitoring Condition

EU=1-PAPER,Proc=PM4,ES=PAPM4

*2-32 6NYCRR 201-7.2: Capping Monitoring Condition

EU=1-PREPA

20 6NYCRR 212.6(a): Compliance Certification

EU=1-PREPA,EP=00018,Proc=TMR,ES=TITMT

21 6NYCRR 212.4(c): Compliance Certification

EU=1-PTRIM

22 6NYCRR 212.6(a): Compliance Certification

EU=1-PTRIM,EP=00035,Proc=PT1,ES=PAPCY

23 6NYCRR 212.4(c): Compliance Certification

EU=4-COMBU,Proc=CB1,ES=BCU01

24 6NYCRR 227-2.4(c)(2): Compliance Certification

EU=4-COMBU,Proc=CB1,ES=BCU02

25 6NYCRR 227-2.4(c)(2): Compliance Certification

EU=4-COMBU,Proc=CB2,ES=BCU03

26 6NYCRR 227-2.4(c)(2): Compliance Certification

EU=4-COMBU,Proc=CB3,ES=BCU06

27 6NYCRR 227-2.4(d): Compliance Certification

EU=4-COMBU,EP=00001

28 6NYCRR 227-1.3(a): Compliance Certification

2-33 6NYCRR 227-1.3(a): Compliance Certification

EU=4-COMBU,EP=00002

29 6NYCRR 227-1.3(a): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

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30 ECL 19-0301: Contaminant List

Emission Unit Level

33 6NYCRR 201-7.1: Process Permissible Emissions



EU=1-PAPER,Proc=PM3,ES=PAPM3

*34 6NYCRR 201-7.1: Capping Monitoring Condition

EU=1-PAPER,Proc=PM4,ES=PAPM4

*35 6NYCRR 201-7.1: Capping Monitoring Condition

EU=4-COMBU

36 6NYCRR 227-1.2(a)(2): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6NYCRR Part 201-1.5

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

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

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

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

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

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

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

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to



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Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

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

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in

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order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

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Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

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

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

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

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

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit



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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L: Permit Exclusion - ECL 19-0305

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

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

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

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

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

**Condition 2-1: Acceptable Ambient Air Quality
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 200.6

Item 2-1.1:

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit



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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 2-2: Fees
Effective for entire length of Permit

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

Item 2-2.1:

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

Condition 2-3: Open Fires Prohibited at Industrial and Commercial Sites
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 215

Item 2-3.1:

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

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

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

Condition 2-4: Maintenance of Equipment
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 200.7

Item 2-4.1:

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 2-5: Recycling and Salvage
Effective for entire length of Permit



Applicable Federal Requirement: 6NYCRR 201-1.7

Item 2-5.1:

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 2-6: Prohibition of Reintroduction of Collected Contaminants to the air
Effective for entire length of Permit**

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 2-6.1:

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 2-7: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit**

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

Item 2-7.1:

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 2-8: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit**

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

Item 2-8.1:

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

Condition 2-9: Standard Requirement - Provide Information



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

Item 2-9.1:

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

Condition 2-10: General Condition - Right to Inspect

Effective for entire length of Permit

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

Item 2-10.1:

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

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 2-11: Standard Requirements - Progress Reports

Effective for entire length of Permit

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

Item 2-11.1:

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

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

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(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 2-12: Off Permit Changes
Effective for entire length of Permit

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

Item 2-12.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 2-13: Required Emissions Tests
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 202-1.1

Item 2-13.1:

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. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 2-14: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 211.3

Item 2-14.1:



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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.

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

Condition 2: Emission Unit Definition

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 2.1(From Mod 2):

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

Emission Unit: 1-OFFMC

Emission Unit Description:

This emission unit consists of one off-machine coater that coats paper produced on both paper machines #3 and #4. The coater includes four drying oven sections. Three sections are exhausted directly to atmosphere (EP 00032, EP 00033, and EP 00034) and one is exhausted into the room.

Building(s): MAIN

Item 2.2(From Mod 2):

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

Emission Unit: 1-PAPER

Emission Unit Description:

This emission unit consists of paper machines #3 and #4. On paper machine 3, paper is formed and passes through three dryer sections which are exhausted to an economizer and then to atmosphere (EP 00021). After the third dryer section, the paper is passed through a calendar prior to being rolled. The calendar is exhausted directly to atmosphere (EP 00020). On paper machine 4, paper passes through three dryer sections that are each exhausted by a separate economizer and exhaust stack (EP 00022, EP 00030, and EP 00031).

Building(s): MAIN



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Item 2.3(From Mod 2):

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

Emission Unit: 1-PREPA

Emission Unit Description:

This emission unit consists of one exhaust system servicing the abbe blenders, mixers, and ammonia totes that exhausts through one emission point (00017) and one titanium make-up tank that mixes titanium dioxide, ansilex, and water. The titanium tank exhausts to atmosphere (EP 00018). The exhaust is directly above the tank.

Building(s): MAIN

Item 2.4(From Mod 2):

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

Emission Unit: 4-COMBU

Emission Unit Description:

This emission unit consists of two # 6 oil fired boilers. Boilers 1 & 2, are both rated at 99 MMBtu/hr and provide steam for facility operations and building heat. The boilers are exhausted directly to the atmosphere through a common stack (EP 00001).

Building(s): BOILER

Item 2.5(From Mod 0):

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

Emission Unit: 1-PTRIM

End Date: 03/16/2007

Emission Unit Description:

THIS EMISSION UNIT CONSISTS OF ONE PAPER TRIMMER MACHINE THAT CUTS THE PAPER TO DESIRED SPECIFICATIONS USING THE FINISHED WAREHOUSE TRIM SYSTEM. THE PROCESS IS EXHAUSTED TO A CYCLONE AND THEN TO THE ATMOSPHERE (EP00035).

Building(s): WAREHOUSE

Condition 2-15: Facility Permissible Emissions

Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-15.1:

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



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

CAS No: 007446-09-5 (From Mod 2) PTE: 1,766,000 pounds per year
Name: SULFUR DIOXIDE

Condition 2-16: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-16.1:

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:

40CFR 52-A.21

Item 2-16.2:

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

Item 2-16.3:

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 2-16.4:

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 2-16.5:

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 2-16.6:

The Compliance Certification activity will be performed for the Facility.

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

Item 2-16.7:

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Compliance Certification shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility emissions of sulfur dioxide shall not exceed 883 tons during any consecutive 12 month period. To demonstrate compliance with this limit the facility shall perform the following:

Facility shall maintain records of the amount of each fuel burned, in each combustion source at the facility, on a monthly basis. At the end of each month facility owner shall utilize the monthly quantity of fuel burned and the corresponding sulfur content of the that fuel to calculate the monthly emissions of sulfur dioxide (SO₂) by inserting that information into the equation below to generate a monthly sulfur dioxide emission rate. The monthly sulfur dioxide emissions shall be added to the previous 11 months of sulfur dioxide emissions to give a total sulfur dioxide emission rate over the most recent consecutive 12 month period. The sulfur dioxide emissions over any consecutive 12 month period shall not exceed 883 tons.

$$\text{Tons of sulfur dioxide emitted} = [(157 \times S_6 \times \text{FOB}) + (142 \times S_2 \times \text{FOE}) + (0.86 \times \text{WFP}) + (0.45 \times \text{DFP})] / 2000$$

where:

S₆ = weight percent of sulfur in #6 fuel oil burned in boilers BCU01 & BCU02

S₂ = weight percent of sulfur in #2 fuel oil burned in exempt and trivial boilers

FOB = thousands of gallons of #6 fuel oil burned in boilers BCU01 & BCU02 during the month

FOE = thousands of gallons of #2 fuel oil burned in exempt and trivial boilers during the month

WFP = number of hours the warehouse fire pump operated during the month

DFP = number of hours the main dam fire pump operated during the month



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When sufficient new evidence becomes available to substantiate changing the emission factors used in the above equation the Department will discuss modifying this condition with the applicant prior to making any changes to this condition.

Process Material: FUEL OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 883 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2-17: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.4(c)

Replaces Condition(s) 21

Item 2-17.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PAPER Emission Point: 00020

Emission Unit: 1-PAPER Emission Point: 00021

Emission Unit: 1-PAPER Emission Point: 00022

Emission Unit: 1-PAPER Emission Point: 00030

Emission Unit: 1-PAPER Emission Point: 00031

Emission Unit: 1-PREPA Emission Point: 00017

Emission Unit: 1-PREPA Emission Point: 00018

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:



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Emissions of solid particulates from the emission points specified in this condition are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. This standard applies to each emission point associated with emission units 1-PAPER & 1-PREPA.

Performance of the monitoring, record keeping, and reporting requirements contained in the permit condition for the opacity standard codified at 6 NYCRR Part 212.6(a), will constitute compliance with the particulate emission limit contained above unless an approved emissions test determines non-compliance.

The Department reserves the right to perform or require the performance of a particulate emissions test following EPA Reference Method 5 at any time while emission units 1-PAPER & 1-PREPA are in service at the facility.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA RM 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 2-18: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.6(a)

Item 2-18.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PAPER Emission Point: 00020

Emission Unit: 1-PAPER Emission Point: 00021

Emission Unit: 1-PAPER Emission Point: 00022

Emission Unit: 1-PAPER Emission Point: 00030



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Emission Unit: 1-PAPER Emission Point: 00031

Emission Unit: 1-PREPA Emission Point: 00017

Emission Unit: 1-PREPA Emission Point: 00018

Item 2-18.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Facility shall not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of an EPA Reference Method 9 opacity evaluation at any time during facility operation. This standard applies to each emission point associated with emission units 1-PAPER & 1-PREPA.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA RM 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 2-19: Compliance Certification

Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 19, 20

Item 2-19.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-PAPER Emission Point: 00020

Emission Unit: 1-PAPER Emission Point: 00021

Emission Unit: 1-PAPER Emission Point: 00022



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Emission Unit: 1-PAPER Emission Point: 00030

Emission Unit: 1-PAPER Emission Point: 00031

Emission Unit: 1-PREPA Emission Point: 00017

Emission Unit: 1-PREPA Emission Point: 00018

Item 2-19.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee will conduct observations of visible emissions, from each emission point associated with emission units 1-PAPER & 1-PREPA, at the monitoring frequency stated below while they are in operation. The permittee will immediately investigate any instance where there is cause to believe that visible emissions above those that are normal and in compliance are occurring or have occurred from an emission source.

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

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

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

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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



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Condition 12: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date

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

Replaced by Condition(s) 2-20

Item 12.1:

The Compliance Certification activity will be performed for the Facility.

Item 12.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall use, purchase, sell, or offer for sale any distillate fuel oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent

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 2-20: Compliance Certification

Effective for entire length of Permit

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

Replaces Condition(s) 12

Item 2-20.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall use, purchase, sell, or offer for sale any distillate fuel oil which has a sulfur content greater



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than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2-21: Compliance Certification
Effective for entire length of Permit

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

Item 2-21.1:

The Compliance Certification activity will be performed for the Facility.

Item 2-21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

No person shall use, purchase, sell, or offer for sale any residual fuel oil which has a sulfur content greater than the limit presented below. A log of the sulfur content in oil per delivery must be maintained on site for a minimum of five years after the date of the last entry.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL 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: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2-22: Compliance Certification



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Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 227-2.4(c)(2)

Item 2-22.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 4-COMBU

Process: CB1

Emission Source: BCU01

Emission Unit: 4-COMBU

Process: CB1

Emission Source: BCU02

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2-22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must perform preventative maintenance (PM) on the burner tips of both boilers (emission sources BCU01 & BCU02) at a minimum of every nine days or more frequently if burner manufacturer changes its recommended PM schedule for the burner tips. The following information must be maintained in a format acceptable to the department:

- (1) the date of each burner PM;
- (2) the name, title and affiliation of the person who performed the burner PM; and
- (3) a brief description of the burner PM performed.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 2-23: Compliance Certification

Effective for entire length of Permit



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Applicable Federal Requirement: 6NYCRR 227-2.4(c)(2)

Replaces Condition(s) 24, 25

Item 2-23.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 4-COMBU

Process: CB1

Emission Source: BCU01

Emission Unit: 4-COMBU

Process: CB1

Emission Source: BCU02

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2-23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The one hour average emission of oxides of nitrogen from each stationary combustion installation shall not exceed 0.30 pounds per million Btu of heat input.

At the monitoring frequency stated below the facility shall perform the following:

- 1) Submit to the Department an acceptable protocol for the testing of oxides of nitrogen emissions in a manner that will determine compliance with the limit cited in this condition.
- 2) Perform a stack test, based upon the approved test protocol, to determine compliance with the oxides of nitrogen emission limit cited in this condition.
- 3) Submit an acceptable stack test report that outlines the results obtained from the testing done to meet the requirement of #2 above.
- 4) Facility shall keep records of all testing done at this stationary combustion installation for a period of 5 years.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.30 pounds per million Btus



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Reference Test Method: EPA RM 7, 7E or 19
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-24: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 2-24.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 4-COMBU
Process: CB1 Emission Source: BCU01

Emission Unit: 4-COMBU
Process: CB1 Emission Source: BCU02

Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN
CAS No: 0NY075-00-0 PARTICULATES

Item 2-24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility must annually perform a tune-up of both boilers
(emission sources BCU01 & BCU02) and maintain, in a format
acceptable to the department, the following information:

- (1) the date of the last tune-up;
- (2) the name, title and affiliation of the person who made
the adjustments; and
- (3) a brief description of what adjustments were made to
the boiler, if any.

Monitoring Frequency: ANNUALLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).



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Condition 2-25: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 227.2(b)(1)

Item 2-25.1:

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

Emission Unit: 4-COMBU
Process: CB1 Emission Source: BCU01

Emission Unit: 4-COMBU
Process: CB1 Emission Source: BCU02

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

Item 2-25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

The two hour average emission of particulates from each stationary combustion installation shall not exceed 0.10 pounds per million Btu of heat input.

At the monitoring frequency stated below the facility shall perform the following:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emissions in a manner that will determine compliance with the limit cited in this condition.
- 2) Perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.
- 3) Submit an acceptable stack test report that outlines the results obtained from the testing done to meet the requirement of #2 above.
- 4) Facility shall keep records of all testing done at this stationary combustion installation for a period of 5 years.



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Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA RM 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-26: Compliance Certification

Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.4

Replaces Condition(s) 18

Item 2-26.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 1-OFFMC Emission Point: 00032

Emission Unit: 1-OFFMC Emission Point: 00033

Emission Unit: 1-OFFMC Emission Point: 00034

Item 2-26.2:

Compliance Certification shall include the following monitoring:

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

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. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA RM 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)



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Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2-27: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 228.7

Replaces Condition(s) 13

Item 2-27.1:

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

Emission Unit: 1-OFFMC
Process: OMC Emission Source: OMC01

Emission Unit: 1-PAPER
Process: PM3 Emission Source: PAPM3

Emission Unit: 1-PAPER
Process: PM4 Emission Source: PAPM4

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

Item 2-27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Reference Test Method: EPA RM 24 or 311

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

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

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 13: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 228.7

Replaced by Condition(s) 2-27

Item 13.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 13.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The maximum permitted pounds of VOC per gallon (minus water and excluded VOC) of coating at application, for paper coating lines is 2.9

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

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 2-28: Compliance Certification

Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 52.21(r)(6), Subpart A

Item 2-28.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

Item 2-28.2:

Compliance Certification shall include the following monitoring:

New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain records of the amount of each fuel burned, in each combustion source at the facility, on a monthly basis. At the end of each month facility owner shall utilize the monthly quantity of fuel burned to calculate the monthly emissions of particulate matter less than 10 microns in diameter (PM-10) by inserting that information into the equation below to generate a monthly PM-10 emission rate. The monthly PM-10 emissions shall be added to the previous 11 months of PM-10 emissions to give a total PM-10 emission rate over the most recent consecutive 12 month period.

$$\text{Tons of PM-10 emitted} = [(P1 \times FO1) + (P2 \times FO2) + (2.0 \times FOE) + (0.92 \times WFP) + (0.48 \times DFP)]/2000$$

where:

P1 = particulate emission factor (pounds/thousand gallons) for boiler BCU01 from most recent stack test

P2 = particulate emission factor (pounds/thousand gallons) for boiler BCU02 from most recent stack test

FO1 = thousands of gallons of #6 fuel oil burned in boiler BCU01 during the month

FO2 = thousands of gallons of #6 fuel oil burned in boiler BCU02 during the month

FOE = thousands of gallons of #2 fuel oil burned in exempt and trivial boilers during the month

WFP = number of hours the warehouse fire pump operated during the month

DFP = number of hours the main dam fire pump operated during the month

When sufficient new evidence becomes available to substantiate changing the emission factors used in the above equation the Department will discuss modifying this condition with the applicant prior to making any changes to this condition.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

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

Condition 2-29: Compliance Certification
Effective for entire length of Permit

Applicable Federal Requirement: 40CFR 52.21(r)(6), Subpart A

Item 2-29.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2-29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain records of the amount of each fuel burned, in each combustion source at the facility, on a monthly basis. At the end of each month facility owner shall utilize the monthly quantity of fuel burned to calculate the monthly emissions of oxides of nitrogen (NO_x) by inserting that information into the equation below to generate a monthly NO_x emission rate. The monthly NO_x emissions shall be added to the previous 11 months of NO_x emissions to give a total NO_x emission rate over the most recent consecutive 12 month period.

$$\text{Tons of NO}_x \text{ emitted} = [(N1 \times FO1) + (N2 \times FO2) + (20 \times FOE) + (13.02 \times WFP) + (6.82 \times DFP)]/2000$$

where:

N1 = NO_x emission factor (pounds/thousand gallons) for boiler BCU01 from most recent stack test

N2 = NO_x emission factor (pounds/thousand gallons) for boiler BCU02 from most recent stack test

FO1 = thousands of gallons of #6 fuel oil burned in boiler BCU01 during the month

FO2 = thousands of gallons of #6 fuel oil burned in boiler BCU02 during the month

FOE = thousands of gallons of #2 fuel oil burned in exempt and trivial boilers during the month



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

WFP = number of hours the warehouse fire pump operated during the month

DFP = number of hours the main dam fire pump operated during the month

When sufficient new evidence becomes available to substantiate changing the emission factors used in the above equation the Department will discuss modifying this condition with the applicant prior to making any changes to this condition.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

**Condition 16: Emission Point Definition By Emission Unit
Effective between the dates of 08/04/2004 and Permit Expiration Date**

Applicable Federal Requirement: 6NYCRR 201-6

Item 16.1(From Mod 2):

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

Emission Unit: 1-OFFMC

Emission Point: 00032

Height (ft.): 57 Length (in.): 38 Width (in.): 22
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00033

Height (ft.): 57 Length (in.): 38 Width (in.): 22
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00034

Height (ft.): 61 Length (in.): 38 Width (in.): 22
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Item 16.2(From Mod 2):

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

Emission Unit: 1-PAPER



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

Emission Point: 00020
Height (ft.): 65 Diameter (in.): 45
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00021
Height (ft.): 59 Length (in.): 47 Width (in.): 64
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00022
Height (ft.): 71 Length (in.): 34 Width (in.): 47
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00030
Height (ft.): 69 Diameter (in.): 46
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00031
Height (ft.): 71 Length (in.): 47 Width (in.): 47
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Item 16.3(From Mod 2):

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

Emission Unit: 1-PREPA

Emission Point: 00017
Height (ft.): 44 Diameter (in.): 42
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Emission Point: 00018
Height (ft.): 39 Diameter (in.): 24
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: MAIN

Item 16.4(From Mod 2):

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

Emission Unit: 4-COMBU

Emission Point: 00001
Height (ft.): 75 Diameter (in.): 72
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: BOILER

Item 16.5(From Mod 0):

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

Emission Unit: 1-PTRIM



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

Emission Point: 00035 Removal Date: 03/16/2007
Height (ft.): 20 Diameter (in.): 10
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: WAREHOUSE

Item 16.6(From Mod 0):

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

Emission Unit: 4-COMBU

Emission Point: 00002 Removal Date: 03/16/2007
Height (ft.): 185 Diameter (in.): 120
NYTMN (km.): 4895.623 NYTME (km.): 500.729 Building: BOILER

Condition 17: Process Definition By Emission Unit
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 201-6

Item 17.1(From Mod 2):

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

Emission Unit: 1-OFFMC
Process: OMC Source Classification Code: 4-02-007-10
Process Description:

This process consists of one off-machine coater that applies coating to paper produced from paper machines #3 and #4 and consists of three emission points.

Emission Source/Control: OMC01 - Process

Item 17.2(From Mod 2):

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

Emission Unit: 1-PAPER
Process: PM3 Source Classification Code: 3-07-004-99
Process Description:

This process consists of paper machine #3. The paper is formed and passes through three dryer sections which are exhausted to an economizer and then to the atmosphere at emission point 00021. After the third drying section, it proceeds through a calendar prior to being rolled. The calendar is exhausted directly to the atmosphere at emission point 00020.



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

Emission Source/Control: PAPM3 - Process

Item 17.3(From Mod 2):

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

Emission Unit: 1-PAPER

Process: PM4

Source Classification Code: 4-02-011-21

Process Description:

This process consists of paper machine #4. The paper is formed and passes through dryer sections. Each dryer section is exhausted by a separate economizer and exhaust stack at emission points 00022, 00030, and 00031.

Emission Source/Control: PAPM4 - Process

Item 17.4(From Mod 2):

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

Emission Unit: 1-PREPA

Process: CK1

Source Classification Code: 3-07-004-07

Process Description:

Process CK1 consists of the coating preparation area where coating formulations are prepared for both paper machines and the off-machine coater. The exhaust system servicing the abbe blenders, mixers, and ammonia totes exhausts through emission point 00017.

Emission Source/Control: COATK - Process

Item 17.5(From Mod 2):

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

Emission Unit: 1-PREPA

Process: TMR

Source Classification Code: 3-07-002-13

Process Description:

Process TMR consists of a titanium make-up tank that mixes titanium dioxide, ansilex, and water. Bags of ansilex are opened above the tank and the powder is poured into the titanium dioxide slurry. A general ventilation room exhaust located directly above the tank exhausts particulate emissions to the atmosphere at emission point 00018.

Emission Source/Control: TITMT - Process

Item 17.6(From Mod 2):

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



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Emission Unit: 4-COMBU

Process: CB1

Source Classification Code: 4-02-040-04

Process Description:

This process consists of two #6 oil fired boilers (Boilers 1 and 2) that provide steam for space heating and daily process use. Boilers 1 and 2 are identical units rated at 99 MMBtu/hr and serve as the primary steam generators.

Emission Source/Control: BCU01 - Combustion

Design Capacity: 99 million Btu per hour

Emission Source/Control: BCU02 - Combustion

Design Capacity: 99 million Btu per hour

Item 17.7(From Mod 0):

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

Emission Unit: 1-PTRIM

Process: PT1

Source Classification Code: 3-07-008-05

Process End Date: 3/16/2007

Process Description:

PROCESS PT1 CONSISTS OF A PAPER TRIMMER MACHINE THAT CUTS THE FINISHED PRODUCT TO DESIRED SPECIFICATIONS USING THE FINISHED WAREHOUSE TRIM S YSTEM. PARTICULATE EMISSIONS FROM THIS PROCESS ARE EXHAUSTED TO A CYCLONE AND THEN TO THE ATMOSPHERE AT EMISSION P OINT EP00035.

Emission Source/Control: PAPCY - Process Removal Date: 03/16/2007

Emission Source/Control: PAPTR - Process Removal Date: 03/16/2007

Item 17.8(From Mod 0):

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

Emission Unit: 4-COMBU

Process: CB2

Source Classification Code: 3-90-900-05

Process End Date: 3/16/2007

Process Description:

THIS PROCESS CONSISTS OF A NO. 6 OIL FIRED BOILER THAT GENERATES STEAM FOR SPACE HEATING AND PROCESS USE. BOILER NO. 3 IS RATED AT 83 MMBTU/HR.



New York State Department of Environmental Conservation

Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

The Compliance Certification activity will be performed for:

Emission Unit: 1-OFFMC

Item 18.2:

Compliance Certification shall include the following monitoring:

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

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. Compliance with this requirement shall be determined by the facility owner/operator conducting a daily survey of visible emissions when the process is in operation. If any visible emissions are identified, corrective action is required. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaced by Condition(s) 2-19

Item 19.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER

Item 19.2:

Compliance Certification 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

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percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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

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

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

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

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-31: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-31.1:

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:



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Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

6NYCRR 212.10(c)(4)(iii)

Item 2-31.2:

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

Item 2-31.3:

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.

Item 2-31.4:

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 2-31.5:

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 2-31.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER
Process: PM3 Emission Source: PAPM3

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

Item 2-31.7:

Compliance Certification shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:
This source is operating under a VOC RACT variance because of an economic infeasibility. VOC emissions from emission source PAPM3 must be maintained below the upper limit stated below. The facility will determine VOC emissions by using mass balance calculations on materials used during the process and assume that all raw material



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VOC used at PAPM3 are emitted from the emission source.

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

Compliance with this condition shall constitute compliance with the VOC RACT requirements as required in 6 NYCRR Part 212.10.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 28.7 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 2-32: Capping Monitoring Condition
Effective for entire length of Permit

Applicable Federal Requirement: 6NYCRR 201-7.2

Item 2-32.1:

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

6NYCRR 212.10(c)(4)(iii)

Item 2-32.2:

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

Item 2-32.3:

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.



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Facility DEC ID: 6402600001

Item 2-32.4:

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 2-32.5:

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 2-32.6:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PAPER

Process: PM4

Emission Source: PAPM4

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2-32.7:

Compliance Certification shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

This source is operating under a VOC RACT variance because of an economic infeasibility. VOC emissions from emission source PAPM4 must be maintained below the upper limit stated below. The facility will determine VOC emissions by using mass balance calculations on materials used during the process and assume that all raw material VOC used at PAPM4 are emitted from the emission source.

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

Compliance with this condition shall constitute compliance with the VOC RACT requirements as required in 6 NYCRR Part 212.10.



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Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 28.2 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 20: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaced by Condition(s) 2-19

Item 20.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PREPA

Item 20.2:

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

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

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correction, and verify that the excess visible emissions problem has been corrected.

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

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

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 21: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.4(c)

Replaced by Condition(s) 2-17

Item 21.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PREPA Emission Point: 00018
Process: TMR Emission Source: TITMT

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

Item 21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

If this condition appears in a Title V permit, and the Department has not otherwise directed the permittee to conduct a stack test, compliance with the 0.050

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grains/dscf particulate emission standard will be determined by the permittee's observation of the outlet of the emission source to determine whether or not visible emissions are present following the guidelines similar to EPA Method 22. Visible emissions will not include those due to water vapor that is present in the exhaust gas. Observations must be made once per day while operations are taking place. These observations must be recorded in a log book, and be made available to the Department on request. If visible emissions are observed for two consecutive days, a Method 9 visible emissions test must be conducted by a certified observer. If the Method 9 test determines that the opacity is less than 20%, observations of the stack in question shall be used to determine that the opacity of these emissions remain less than 20%.

The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations as well as instances in which visible emissions were observed or in which observations could not be made due to weather conditions.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

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

Condition 22: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 212.6(a)

Expired by Mod 2

Item 22.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PTRIM



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Permit ID: 6-4026-00001/00047

Facility DEC ID: 6402600001

Item 22.2:

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

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

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

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

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 23: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date



Applicable Federal Requirement: 6NYCRR 212.4(c)

Expired by Mod 2

Item 23.1:

The Compliance Certification activity will be performed for:

Emission Unit: 1-PTRIM Emission Point: 00035
Process: PT1 Emission Source: PAPCY

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

Item 23.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

If this condition appears in a Title V permit, and the Department has not otherwise directed the permittee to conduct a stack test, compliance with the 0.050 grains/dscf particulate emission standard will be determined by the permittee's observation of the outlet of the emission source to determine whether or not visible emissions are present following the guidelines similar to EPA Method 22. Visible emissions will not include those due to water vapor that is present in the exhaust gas. Observations must be made once per day while operations are taking place. These observations must be recorded in a log book, and be made available to the Department on request. If visible emissions are observed for two consecutive days, a Method 9 visible emissions test must be conducted by a certified observer. If the Method 9 test determines that the opacity is less than 20%, observations of the stack in question shall be used to determine that the opacity of these emissions remain less than 20%.

The semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these observations as well as instances in which visible emissions were observed or in



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which observations could not be made due to weather conditions.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

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

Condition 24: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 227-2.4(c)(2)

Item 24.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU

Process: CB1 Emission Source: BCU01

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limits for midsize boilers, where initial stacking testing is required for compliance.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.30 pounds per million Btus

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 25: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 227-2.4(c)(2)

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Item 25.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU

Process: CB1

Emission Source: BCU02

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 25.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limits for midsize boilers, where initial stacking testing is required for compliance.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.30 pounds per million Btus

Monitoring Frequency: SINGLE OCCURRENCE

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Certification

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 227-2.4(c)(2)

Expired by Mod 2

Item 26.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU

Process: CB2

Emission Source: BCU03

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

NOx emission limits for midsize boilers, where initial stacking testing is required for compliance.



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Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 0.30 pounds per million Btus
Monitoring Frequency: SINGLE OCCURRENCE
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable Federal Requirement: 6NYCRR 227-2.4(d)

Expired by Mod 2

Item 27.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU
Process: CB3 Emission Source: BCU06

Item 27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

A boiler tune-up shall be performed annually. The owner or operator of a small boiler shall maintain a log (in the format acceptable to the Department) containing the following information: (1) The date which the equipment was adjusted; and (2) The name, title, and affiliation of the person who adjusted the equipment.

Monitoring Frequency: ANNUALLY
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 28: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

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

Replaced by Condition(s) 2-33

Item 28.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU Emission Point: 00001

Item 28.2:

Compliance Certification shall include the following monitoring:



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

Monitoring Description:

No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60. Opacity shall be monitored on a daily basis whenever the unit is in operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-33: Compliance Certification

Effective for entire length of Permit

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

Replaces Condition(s) 28

Item 2-33.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU Emission Point: 00001

Item 2-33.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one-six-minute period per hour of not more than 27 percent opacity.

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

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee

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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.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Method 9
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 6 calendar month(s).

Condition 29: Compliance Certification
Effective between the dates of 08/04/2004 and Permit Expiration Date

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

Expired by Mod 2

Item 29.1:

The Compliance Certification activity will be performed for:

Emission Unit: 4-COMBU Emission Point: 00002

Item 29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall operate the installation in such a way to emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test Method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 30: Contaminant List
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 30.1:

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



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

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

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

CAS No: 0NY075-00-5
Name: PM-10

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

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

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

Condition 33: Process Permissible Emissions
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.1

Expired by Mod 2
Applicaton Specific Data

Condition 34: Capping Monitoring Condition
Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.1

Expired by Mod 2

Item 34.1:

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

6NYCRR 212.10(c)(4)(iii)

Item 34.2:

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

Item 34.3:



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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 34.4:

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 34.5:

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 34.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAPER
Process: PM3 Emission Source: PAPM3

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

Item 34.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
This source is operating under a VOC RACT variance because of an economic infeasibility. VOC's will be monitored to maintain emissions from this source below the upper limit stated below by using mass balance calculations on materials used during the process.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: RAW MATERIAL
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 28.7 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.



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The initial report is due 1/30/2005.

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

Condition 35: Capping Monitoring Condition

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 201-7.1

Expired by Mod 2

Item 35.1:

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

6NYCRR 212.10(c)(4)(iii)

Item 35.2:

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

Item 35.3:

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 35.4:

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 35.5:

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 35.6:

The Compliance Demonstration activity will be performed for:

Emission Unit: 1-PAPER

Process: PM4

Emission Source: P4PM4

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC



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Item 35.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

This source is operating under a VOC RACT variance because of an economic infeasibility. VOC's will be monitored to maintain emissions from this source below the upper limit stated below by using mass balance calculations on materials used during the process.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: RAW MATERIAL

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 28.2 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MINIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

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

Condition 36: Compliance Demonstration

Effective between the dates of 08/04/2004 and Permit Expiration Date

Applicable State Requirement: 6NYCRR 227-1.2(a)(2)

Expired by Mod 2

Item 36.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 4-COMBU

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 36.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for a boiler or combination of boilers (connected to the same emission point) with a maximum heat input exceeding 50 mmBtu per hour but no greater than 250 mmBtu per hour firing oil, other than

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distillate oil.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.20 pounds per million Btus
Reference Test Method: Method 5 / Method 17
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY