



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-4058-00123/00002
Mod 0 Effective Date: 05/29/2007 Expiration Date: 09/24/2015
Mod 1 Effective Date: 09/24/2014 Expiration Date: 09/24/2015

Permit Issued To: CURRAN RENEWABLE ENERGY LLC
15121 ST RTE 37
MASSENA, NY 13662

Contact: PATRICK CURRAN
CURRAN RENEWABLE ENERGY LLC
15121 ST RTE 37
MASSENA, NY 13662
(315) 769-5970

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13622

Description:

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

Permit Administrator: LAWRENCE R AMBEAU
NYSDEC - REGION 6
317 WASHINGTON ST
WATERTOWN, NY 13601

Authorized Signature: _____ Date: ___ / ___ / ____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

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

Facility Level

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



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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



Condition 1-1: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 1-1.1:

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

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

Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 6 HEADQUARTERS

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Headquarters
Division of Environmental Permits
State Office Building, 317 Washington Street

New York State Department of Environmental Conservation
Facility DEC ID: 6405800123



Watertown, NY 13601-3787
(315) 785-2245

New York State Department of Environmental Conservation

Permit ID: 6-4058-00123/00002

Facility DEC ID: 6405800123



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: CURRAN RENEWABLE ENERGY LLC
15121 ST RTE 37
MASSENA, NY 13662

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13622

Authorized Activity By Standard Industrial Classification Code:
2499 - WOOD PRODUCTS, NEC

Mod 0 Permit Effective Date: 05/29/2007

Permit Expiration Date: 09/24/2015

Mod 1 Permit Effective Date: 09/24/2014

Permit Expiration Date: 09/24/2015



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

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- 1-2 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 1-3 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
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- *1-6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 1-8 6 NYCRR 211.1: Air pollution prohibited
- 1-9 6 NYCRR 212.6 (a): Compliance Demonstration
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Emission Unit Level

- 1-14 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions
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STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

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- 1-16 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 39 6 NYCRR Subpart 201-5: Emission Unit Definition
- 1-17 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
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Emission Unit Level

- 43 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 44 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

Item E: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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



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

Item F: Recycling and Salvage - 6 NYCRR 201-1.7

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

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

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

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

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

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

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

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



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

Item K: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1-1: Exempt and Trivial Activities Applicability

New York State Department of Environmental Conservation

Permit ID: 6-4058-00123/00002

Facility DEC ID: 6405800123



Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 201-3.1 (a)

Item 1-1.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 1-2: Compliance Demonstration

Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 201-6.4 (b) (1)

Item 1-2.1:

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

Emission Unit: 1-DRYER Emission Point: 00001

Emission Unit: 1-DRYER Emission Point: 00003

Emission Unit: 2--FORM Emission Point: 00006

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

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility shall re-conduct RM 25A on a ten-year interval to verify that facility-wide VOC emissions do not exceed this 10.5 lbs/hr compliance standard (the major source threshold). Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Units of measurement shall be in both ppm and in lbs/hr. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 10.5 pounds per hour

Reference Test Method: EPA Reference Method 25A

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-3: Compliance Demonstration

Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 201-6.4 (b) (1)

New York State Department of Environmental Conservation

Permit ID: 6-4058-00123/00002

Facility DEC ID: 6405800123



Item 1-3.1:

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

Emission Unit: 1-DRYER Emission Point: 00001

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 1-3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Facility shall re-conduct EPA Reference Method 10 on a ten-year interval to verify that facility-wide carbon monoxide (CO) emissions do not exceed this 21.5 lbs/hr compliance standard (the major source threshold). Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Protocol shall report CO in units of ppm and also in lbs/hr. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 21.5 pounds per hour
Reference Test Method: EPA Reference Method 10
Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-4: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement: 6 NYCRR 201-6.4 (b) (1)

Item 1-4.1:

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

Emission Unit: 1-DRYER Emission Point: 00001

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

Item 1-4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Facility shall re-conduct EPA Reference Methods 1 through 5 on a ten-year interval to verify that particulate

New York State Department of Environmental Conservation

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Facility DEC ID: 6405800123



emissions from the above-referenced emission point do not exceed the 0.05 grains per dry standard cubic foot of exhaust gas compliance standard. Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Stack test results shall be reported in terms of gr/dscf and also in lbs/hr. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Reference Methods 1 through 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 1-5: Facility Permissible Emissions
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-5.1:

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

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

CAS No: 0NY075-00-0 (From Mod 1) PTE: 190,000 pounds
per year

Name: PARTICULATES

Condition 1-6: Capping Monitoring Condition
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-6.1:

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

6 NYCRR 201-6.1 (a)

Item 1-6.2:

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

Item 1-6.3:

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



REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's burner firing temperature had not fallen below 1,804 degrees Fahrenheit while chip drying was underway.

NONCOMPLIANCE:

Any noncompliance with the 1,804 degree firing temperature lower limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 1,804 degrees Fahrenheit

Monitoring Frequency: Hourly when in use

Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 1-7: Capping Monitoring Condition
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-7.1:

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

6 NYCRR 201-6.1 (a)

Item 1-7.2:

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

Item 1-7.3:

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

Item 1-7.4:

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



applicable requirement.

Item 1-7.5:

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

Item 1-7.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that the production of finished pellets remains less than 182,692 tons per consecutive 12 month rolling period. This limit has been placed upon this facility in surrogate to ensure that particulate emissions remain less than 190,000 lbs/yr. The basis of this cap is in the 10/9/2013 stack test, where particulate emissions through EP00001 were found to be 1.04 pounds of PM per ton of pellets produced ($190,000/1.04 = 182,692$).

RECORDS:

Facility owner shall maintain records that verify the facility's monthly pellet production. These records shall be maintained at the facility for a minimum five year period. Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's pellet production during any consecutive 365 day period were less than 182,692 tons.

REPORTS:

Each Annual Monitoring Report shall include information that documents pellet production. Submittal of the form "Annual Capping Certification" is essential. Also required is submittal of the form: "Truth, Accuracy & Completeness".

NONCOMPLIANCE:

Any noncompliance with this pellet production limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: PELLETS

New York State Department of Environmental Conservation

Permit ID: 6-4058-00123/00002

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Upper Permit Limit: 182,692 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 1-8: Air pollution prohibited
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 211.1

Item 1-8.1:

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

Condition 1-9: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 212.6 (a)

Item 1-9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

The permittee shall investigate the cause, make any

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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.

Reference Test Method: EPA RM9 if requested by NYSDEC

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 1-10: Compliance Demonstration

Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 1-10.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYER

Process: 300

Emission Source: BAGH7

Emission Unit: 2--FORM

Process: 500

Emission Source: BAG11

Emission Unit: 2--FORM

Process: 600

Emission Source: BAG13

Emission Unit: 2--FORM

Process: 600

Emission Source: BAG14

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 1-10.2:

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Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The particulate capture efficiency of these control devices shall be ensured by providing effective baghouse maintenance that is in accord with the manufacturer's specifications and/or empirical history. Baghouses shall be operated within the referenced pressure drop parameters while the associated baghouse is in operation. Manometer readings below 1" WC and above 4" WC shall require immediate root cause analysis and then followed by expedient corrective action. Manometers shall be monitored and recorded once per week and while the baghouse is in operation. Each Annual Monitoring Report shall include copies of these pressure drop log sheets. This record and all other baghouse maintenance records shall be kept for a minimum period of five years.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 4 inches of water

Reference Test Method: EPA Reference Methods 1 - 5 if required by NYSDEC

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 1-11: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement: 6 NYCRR Part 226

Item 1-11.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 1-11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility operates one cold cleaning degreaser that is exempt from permitting per 6 NYCRR 201-3.2(c)(39)(i).



Annually, facility shall monitor and record degreasing solvent usage. Solvent vendor receipts shall be retained as records of solvent addition/removal. Annually, VOC emissions from solvent usage shall be calculated per current MSDS or TDS information and also reported in the Annual Monitoring Report. The solvent in use in 2014 is "PSC 1000", which has 6.743 lbs of VOC/gallon of solvent. Records shall be maintained for a minimum period of five years.

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

Condition 1-12: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement: 6 NYCRR Part 226

Item 1-12.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers
(Non Title V after 12/31/2003)

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.



B. Operating Requirements:

When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

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

Condition 1-13: Compliance Demonstration

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5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make an equivalent entry in the log.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Observe plume daily, do RM 9 by NYSDEC request
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

**** Emission Unit Level ****

Condition 1-14: Emission Unit Permissible Emissions
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-14.1:

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

Emission Unit: 1-DRYER

CAS No: 000071432 (From Mod 1)
Name: BENZENE
PTE(s): 18,000 pounds per year
2.05 pounds per hour

CAS No: 000107028 (From Mod 1)
Name: ACROLEIN
PTE(s): 0.0486 pounds per hour
426 pounds per year

Emission Unit: 2--FORM

CAS No: 000050000 (From Mod 1)
Name: FORMALDEHYDE
PTE(s): 0.1428 pounds per hour
1,251 pounds per year

Condition 1-15: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable Federal Requirement:6 NYCRR 212.4 (c)



Item 1-15.1:

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

Emission Unit: 1-DRYER	Emission Point: 00001
Emission Unit: 1-DRYER	Emission Point: 00002
Emission Unit: 1-DRYER	Emission Point: 00003
Emission Unit: 2--FORM	Emission Point: 00004
Emission Unit: 2--FORM	Emission Point: 00006

Item 1-15.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

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

Additionally, the permittee will investigate, in a timely manner, any instance where there is cause to believe that particulate emissions above 0.050 gr/dscf are occurring or have occurred. These instances include but are not limited to process upsets, control device malfunctions or problems, abnormal visible emissions, complaints, etc. The permittee shall determine the cause of any exceedance, make the necessary correction, and verify that the excess emissions problem has been corrected.

Records of these verifications, investigations and corrective actions will be kept on-site.
Should the Department determine that permittee's record

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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: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA RM 1-5 if requested by NYSDEC

Monitoring Frequency: DAILY

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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



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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.



Condition 37: Contaminant List
Effective between the dates of 05/29/2007 and 09/24/2015

Applicable State Requirement:ECL 19-0301

Item 37.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000071-43-2
Name: BENZENE

CAS No: 000107-02-8
Name: ACROLEIN

CAS No: 000630-08-0
Name: CARBON MONOXIDE

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

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

Condition 1-16: Malfunctions and start-up/shutdown activities
Effective between the dates of 09/24/2014 and 09/24/2015

Applicable State Requirement:6 NYCRR 201-1.4

Item 1-16.1:

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

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



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

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

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

Condition 39: Emission Unit Definition
Effective between the dates of 05/29/2007 and 09/24/2015

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 39.1(From Mod 1):

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

Emission Unit: 1-DRYER

Emission Unit Description:

This emission unit consists of all initial pellet manufacturing operations up to and including the storing of dried wood meal. This EU includes the operations of the wet hammermill and its cyclone. This EU encompasses the firing of the wood-fired furnace and the supplying of dried wood fuel to it. This EU includes the rotary kiln drier, the six-cyclone gang, the operation of the dry hammermill and its associated baghouse and also the storage of this dried meal in the hopper. This EU includes the 55 foot combustion stack and the dry hammermill baghouse stack.

Building(s): Dry Tower
Dryer Area
Wet Tower

Item 39.2(From Mod 1):

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

Emission Unit: 2--FORM

Emission Unit Description:

This emission unit consists of all pellet manufacturing operations that follow the hopper-storage of dried wood meal. Pellets are compression-formed in four pellet mills. Hot pellets are conveyed to a pellet cooler to remove



heat. Two indoor cyclones and one outdoor baghouse pick up PM from the pellet cooler function; these emissions contain VOC and are released through EP00006. Cooled pellets are screened to remove fines. These finished pellets are air-conveyed through outdoor ducts to two outdoor silos (a silo baghouse is utilized {Source: BAG14}). Siloed pellets are conveyed into the bagging building where an automated bagging line fills and seals 50 pound bags. An outdoor baghouse (Source: BAG13) picks up PM from this bagging operation; this baghouse releases through EP00004. A robot assembles and wraps one-ton pallets of bags.

Building(s): Bag Bldg
Mill Bldg
Outdrs LMK

**Condition 1-17: Renewal deadlines for state facility permits
Effective between the dates of 09/24/2014 and 09/24/2015**

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

Item 1-17.1:

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

**Condition 1-18: Compliance Demonstration
Effective between the dates of 09/24/2014 and 09/24/2015**

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

Item 1-18.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 1-18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

New York State Department of Environmental Conservation

Permit ID: 6-4058-00123/00002

Facility DEC ID: 6405800123



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

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

Condition 43: Emission Point Definition By Emission Unit
Effective between the dates of 05/29/2007 and 09/24/2015

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 43.1(From Mod 1):

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

Emission Unit: 1-DRYER

Emission Point: 00001
Height (ft.): 55 Diameter (in.): 48
NYTMN (km.): 4972.795 NYTME (km.): 508.543 Building: Dryer Area

Emission Point: 00002
Height (ft.): 25 Diameter (in.): 20
NYTMN (km.): 4972.827 NYTME (km.): 508.524 Building: Wet Tower

Emission Point: 00003
Height (ft.): 22 Diameter (in.): 36
NYTMN (km.): 4972.815 NYTME (km.): 508.571 Building: Dry Tower

Item 43.2(From Mod 1):

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

Emission Unit: 2--FORM

Emission Point: 00004
Height (ft.): 18 Diameter (in.): 22
NYTMN (km.): 4972.886 NYTME (km.): 508.52 Building: Bag Bldg

Emission Point: 00006
Height (ft.): 42 Length (in.): 72 Width (in.): 16
NYTMN (km.): 4972.827 NYTME (km.): 508.524 Building: Outdrs LMK

Condition 44: Process Definition By Emission Unit
Effective between the dates of 05/29/2007 and 09/24/2015

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 44.1(From Mod 1):

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

Emission Unit: 1-DRYER
Process: 100 Source Classification Code: 3-07-020-04
Process Description:



This process consists of the operation of the wet hammermill, its dedicated cyclone and the stack (EP00002) for that cyclone. Raw green wood chips (incoming feedstock) are fed to a hopper with a front loader. A conveyor feeds these chips to the hammermill where they are re-sized and then ready to be dried.

Emission Source/Control: CYCL5 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: HAMM4 - Process
Design Capacity: 20 Oven dried tons per hour

Item 44.2(From Mod 1):

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

Emission Unit: 1-DRYER
Process: 200 Source Classification Code: 3-90-008-89
Process Description:

This process consists of the operation of the wood-fired furnace, the rotary kiln dryer, the induced draft fan, the six-cyclone gang and the 55 foot stack. This stack is EP00001.

Emission Source/Control: BURN1 - Combustion
Design Capacity: 55 million BTUs per hour

Emission Source/Control: CYCL3 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: DRYR2 - Process
Design Capacity: 20 Oven dried tons per hour

Item 44.3(From Mod 1):

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

Emission Unit: 1-DRYER
Process: 300 Source Classification Code: 3-07-020-04
Process Description:

This process consists of the operation of the dry hammermill, its associated baghouse and that baghouse stack (EP00003). The dry hammermill re-sizes kiln-dried wood chips down to a size that is appropriate for the pellet mills.

Emission Source/Control: BAGH7 - Control
Control Type: FABRIC FILTER

Emission Source/Control: HAMM6 - Process
Design Capacity: 20 Oven dried tons per hour

Item 44.4(From Mod 1):



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

Emission Unit: 2--FORM
Process: 400 Source Classification Code: 3-07-004-05
Process Description:

This process consists of the operation of four pellet mills. Dried and re-sized wood chips are conveyed into these four mills where chips are compressed and formed into wood fuel pellets. Hot pellets are conveyed away. VOCs are released from the pellet mill conveyor enclosure, through an 8" duct and into the combustion zone of the furnace. The ultimate emission point for this process is EP00001, the main stack.

Emission Source/Control: MILL8 - Process
Design Capacity: 5 tons per hour

Item 44.5(From Mod 1):

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

Emission Unit: 2--FORM
Process: 500 Source Classification Code: 3-02-008-06
Process Description:

This process consists of the operation of a pellet cooler and a screen. Also included are two cyclones and an outdoor (LMK) baghouse that together collect PM emissions. The LMK baghouse is outdoors and near the furnace and it releases through EP00006. Hot pellets from the mills are conveyed into the pellet cooler and then through a screen to remove fines. Cooled pellets are air-entrained via ductwork - out of mill building and then to the two silos that are next to the bag line building.

Emission Source/Control: BAG11 - Control
Control Type: FABRIC FILTER

Emission Source/Control: CYC10 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: COOL9 - Process
Design Capacity: 20 Oven dried tons per hour

Item 44.6(From Mod 1):

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

Emission Unit: 2--FORM
Process: 600 Source Classification Code: 3-07-040-04
Process Description:

This process consists of the operation the silo storage of pellets, the automated bagging of pellets and the operation of an outdoor baghouse (Source: BAG13). Two outdoor silos store finished softwood or hardwood pellets,

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a closed-loop silotop baghouse (Source: BAG14, no EP) collects PM from the silo's airspace. As the indoor bagging line demands pellets, pellets are conveyed to that bagging line where they are bagged and then robotically arraigned and wrapped onto one-ton pallets. PM from the bagging line is collected by the outdoor baghouse (Source: BAG13). This baghouse releases through EP00004.

Emission Source/Control: BAG13 - Control
Control Type: FABRIC FILTER

Emission Source/Control: BAG14 - Control
Control Type: FABRIC FILTER

Emission Source/Control: PCK12 - Process
Design Capacity: 20 Oven dried tons per hour

