



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-4099-00057/00002
Mod 0 Effective Date: 11/03/2014 Expiration Date: 11/02/2024
Mod 1 Effective Date: 12/13/2016 Expiration Date: 11/02/2024

Permit Issued To: CURRAN RENEWABLE ENERGY LLC
20 Commerce Dr
MASSENA, NY 13662

Contact: PATRICK CURRAN
15121 STATE HIGHWAY 37
MASSENA, NY 13662
(315) 769-5970

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13662

Description:

Pursuant to Article 19 (Air Pollution Control) of the Environmental Conservation Law, a State Facility Permit Modification, for the facility Curran Renewable Energy LLC, located at 20 Commerce Drive, City of Massena in St Lawrence County, New York, is engaged in the manufacture of wood fuel pellets. The Standard Industrial Classification representative of this facility is 2499 (Wood Products). With respect to air pollution regulation, the activities of concern at Curran Renewable Energy are the by-products of wood combustion, raw wood particulate emissions and VOC/HAP emissions that elute from the pressure-forming of wood into pellets.

This Permit modification adds a new combustion unit (wood-fired furnace) to the permit. Various Air Regulations and caps have been added to accompany the furnace.

The facility has imposed limitations on manufacturing processes that have been designed to control carbon monoxide emission at levels that are below the major source threshold. Various manufacturing processes are required to undergo repetitive stack re-testing at ten year intervals. The stack tests are for carbon monoxide, VOC, HAP and for particulates. This testing regime will verify that this facility's emissions continue to align within current Regulatory Standards.





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: TERRY R TYOE
NYSDEC - UTICA SUBOFFICE
207 GENESEE ST
UTICA, NY 13501-2885

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
 - Applications for permit renewals, modifications and transfers
 - Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA



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

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

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

Item 2.1:

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

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

Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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

Item 1-1.2:

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

Item 1-1.3

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



Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3:

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

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

Item 4.1:

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

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

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 6
SUBOFFICE - UTICA
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 Sub-office
Division of Environmental Permits

New York State Department of Environmental Conservation
Facility DEC ID: 6409900057



State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



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
20 Commerce Dr
MASSENA, NY 13662

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13662

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

Mod 0 Permit Effective Date: 11/03/2014

Permit Expiration Date: 11/02/2024

Mod 1 Permit Effective Date: 12/13/2016

Permit Expiration Date: 11/02/2024



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 201-3.1 (a): Exempt and Trivial Activities Applicability
- 1-1 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 1-2 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 5 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *1-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 8 6 NYCRR 211.1: Air pollution prohibited
- 1-5 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 1-6 6 NYCRR 212-1.5 (g): Compliance Demonstration
- 1-7 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 1-8 6 NYCRR 212-2.4 (b): Compliance Demonstration
- 11 6 NYCRR Part 226: Compliance Demonstration
- 12 6 NYCRR Part 226: Compliance Demonstration
- 1-9 6 NYCRR 227-1.3 (a): Compliance Demonstration

Emission Unit Level

- 14 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 16 ECL 19-0301: Contaminant List
- 17 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 18 6 NYCRR Subpart 201-5: Emission Unit Definition
- 19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 20 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 21 6 NYCRR 211.2: Visible Emissions Limited
- 22 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

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

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

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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



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

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Exempt and Trivial Activities Applicability
Effective between the dates of 11/03/2014 and 11/02/2024

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

Item 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 1-1: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

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

Item 1-1.1:

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

Emission Unit: 1-DRYR1

Process: 202

Emission Source: BURN2

Regulated Contaminant(s):

CAS No: 000630-08-0

CARBON MONOXIDE

CAS No: 0NY075-00-5

PM-10

CAS No: 0NY998-00-0

VOC

Item 1-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Torbel Furnace:

Within 180 days of Torbel furnace qualification, facility shall perform stack tests to determine VOC, CO and PM-10

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



emission characteristics. Curran may receive additional time if such request is supported with technical reasoning and DEC approval.

EPA Reference Method 25A shall be utilized for VOC testing.

EPA Reference Method 10 shall be utilized for CO testing.

EPA Reference Method 1 thru 5, plus 202 shall be utilized for PM-10 testing.

NYSDEC could assign firing parameters in response to test findings. NYSDEC will likely assign caps for VOC, CO and PM-10 after the Torbel performance test. These caps will be likely to require the product of the as-tested emission rates of each furnace and the SCADA-determined firing hours of each furnace (or alternatively, the annual fuel usage to each furnace) to yield annual facility emissions. This permit is likely to require modification after the Torbel testing.

Upper Permit Limit: 10.5 pounds per hour

Reference Test Method: Various - see description

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 1-2: Compliance Demonstration

Effective between the dates of 12/13/2016 and 11/02/2024

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-DRYR1

Process: 201

Emission Source: BURN1

Regulated Contaminant(s):

CAS No: 000630-08-0 CARBON MONOXIDE

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

CAS No: 0NY998-00-0 VOC

Item 1-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Energy Unlimited 55MMBtu/hr furnace:

Facility shall re-conduct stack tests for VOC, CO and

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



PM-10 on a ten-year interval.

NYSDEC could be is willing to consider waiving (upon request) these tests on this furnace in the situation where:

- 1) Curran has installed SCADA monitoring of Energy Unlimited runtime hours, and
- 2) Such monitoring indicates low Energy Unlimited (<440 hrs) annual firing hours, and
- 3) The Torbel furance has been historically carrying >95% of the annual drying workload

EPA Reference Method 25A shall be utilized for VOC testing.

EPA Reference Method 10 shall be utilized for CO testing.

EPA Reference Method 1 thru 5, plus 202 shall be utilized for PM-10 testing.

Upper Permit Limit: 10.5 pounds per hour

Reference Test Method: VOC: RM25A, CO: RM10, PM: RM5+202

Monitoring Frequency: ANNUALLY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 5: Facility Permissible Emissions
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 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:

per year CAS No: 000630-08-0 (From Mod 1) PTE: 198,000 pounds
Name: CARBON MONOXIDE

per year CAS No: 0NY998-00-0 (From Mod 1) PTE: 98,000 pounds
Name: VOC

Condition 1-3: Capping Monitoring Condition
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-3.1:

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



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 1-3.2:

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

Item 1-3.3:

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 1-3.4:

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 1-3.5:

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 1-3.6:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2
Regulated Contaminant(s):	
CAS No: 000630-08-0	CARBON MONOXIDE

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
CAP:

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Facility owner shall ensure that the facility-wide emissions of carbon monoxide (CO), including those from permitted, exempt and trivial sources, remain less than 198,000 pounds during any consecutive 365 day period.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly CO emissions. 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 CO emissions during any consecutive 365 day period were less than 198,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the CO emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and other data used in calculating the monthly CO emissions. The form "Annual Capping Certification" is required.

NONCOMPLIANCE:

Any noncompliance with the CO emission 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: CARBON MONOXIDE

Upper Permit Limit: 198,000 pounds per year

Reference Test Method: If testing becomes required, then use RM10

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 1/30/2017.

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

Condition 1-4: Capping Monitoring Condition
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-4.1:

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 1-4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



limits, terms, conditions and standards in this permit.

Item 1-4.3:

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 1-4.4:

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 1-4.5:

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 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 1-4.7:

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 emissions of volatile organic compounds (VOC), including those from permitted, exempt, and trivial sources, remain less than 98,000 pounds during any consecutive 365 day period. This VOC cap is facility-wide and therefore includes VOC that evolves from both combustion furnaces (via EP 00001), from emission point 00007, from emission point 00006 and from solvent loss in degreasing operations.

RECORDS:

Facility owner must maintain records that verify the facility's monthly VOC emissions. These records shall be maintained at the facility for a period of five years.

REPORTS:

Reports shall be submitted annually, in a format

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



acceptable to the Department, which document that the facility's VOC emissions during any consecutive 365 day period were less than 98,000 pounds. The annual monitoring report shall include information that documents the VOC emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and any other data that had been used in calculating the monthly VOC emissions. The form "Annual Capping Certification" is required.

NONCOMPLIANCE:

Any noncompliance with the VOC emission 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: VOC

Upper Permit Limit: 98,000 pounds per year

Reference Test Method: If test is required, then use RM25A

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 1/30/2017.

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

Condition 8: Air pollution prohibited
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 211.1

Item 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 1-5: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Item 1-5.1:

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

Emission Unit: 1-DRYR1
Process: 201

Emission Point: 00001
Emission Source: BURN1

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Regulated Contaminant(s):

CAS No: 000071-43-2	BENZENE
CAS No: 000107-02-8	ACROLEIN
CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY998-00-0	VOC
CAS No: 000050-00-0	FORMALDEHYDE

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

SOURCE:

This permit condition pertains only to the Energy
Unlimited furnace.

LIMIT:

The facility shall avoid a 100 ton/yr exceedence of the
carbon monoxide by maintaining a minimum burner firing
temperature of 1,804 degrees Fahrenheit while chip-drying
operations are underway. Emissions of VOC, acrolein,
formaldehyde and benzene are similarly contained on a
surrogate basis.

RECORDS:

This firing temperature shall be monitored and logged at
least once per hour. During a previous stack test, carbon
monoxide emissions were shown to escalate at lower firing
temperatures. Facility shall maintain ongoing readiness to
demonstrate the burner firing history (via paper records)
to the Department representative. These records shall be
maintained at the facility for a minimum five year
period.

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

Lower 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.

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



The initial report is due 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 1-6: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Item 1-6.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00003
Process: 300	Emission Source: BAGH7
Emission Unit: 2-FORM1	Emission Point: 00006
Process: 500	Emission Source: BAG11
Emission Unit: 2-FORM1	Emission Point: 00004
Process: 600	Emission Source: BAG13
Emission Unit: 2-FORM1	Emission Point: 00004
Process: 600	Emission Source: BAG14

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

Item 1-6.2:

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 (four baghouses) shall be ensured by providing effective baghouse maintenance that is in accord with the manufacturer's specifications and/or empirical history. Baggouses 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



New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 1/30/2017.
Subsequent reports are due every 12 calendar month(s).

Condition 1-7: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 1-7.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00002
Emission Unit: 1-DRYR1	Emission Point: 00003
Emission Unit: 2-FORM1	Emission Point: 00004
Emission Unit: 2-FORM1	Emission Point: 00006
Emission Unit: 2-FORM1	Emission Point: 00007

Item 1-7.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No facility owner or operator shall cause or allow
emissions having an average opacity during any six
consecutive minutes of 20 percent or greater from any
process emission source or emission point, except for the
emission of uncombined water.

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

Condition 1-8: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 212-2.4 (b)

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Item 1-8.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYR1 Emission Point: 00001

Emission Unit: 1-DRYR1 Emission Point: 00002

Emission Unit: 1-DRYR1 Emission Point: 00003

Emission Unit: 2-FORM1 Emission Point: 00004

Emission Unit: 2-FORM1 Emission Point: 00006

Emission Unit: 2-FORM1 Emission Point: 00007

Regulated Contaminant(s):
CAS No: 0NY075-00-5 PM-10

Item 1-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control of particulate emissions released from new and modified process emission sources. Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Applicable Federal Requirement:6 NYCRR Part 226

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 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 12: Compliance Demonstration
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Part 226

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 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



New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 1-9: Compliance Demonstration
Effective between the dates of 12/13/2016 and 11/02/2024

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

Item 1-9.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 1-9.2:

Compliance Demonstration 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% opacity (6 minute average), except for one six-minute period per hour of not more than 27% opacity.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or to require the performance of a RM 9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per day and while the source is operating. The

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



observer shall not consider that portion of the plume that is due to water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 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 1/30/2017.

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

**** Emission Unit Level ****

Condition 14: Emission Unit Permissible Emissions
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 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-DRYR1

CAS No: 0NY998000 (From Mod 1)

Name: VOC

PTE(s): 48,000 pounds per year

5.5 pounds per hour



Emission Unit: 2-FORM1

CAS No: 0NY998000 (From Mod 1)

Name: VOC

PTE(s): 5.5 pounds per hour

48,000 pounds per year



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

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

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



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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 16: Contaminant List
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:ECL 19-0301

Item 16.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000071-43-2
Name: BENZENE

CAS No: 000107-02-8
Name: ACROLEIN

CAS No: 000630-08-0

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Name: CARBON MONOXIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 0NY998-00-0

Name: VOC

Condition 17: Malfunctions and start-up/shutdown activities
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR 201-1.4

Item 17.1:

(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 18: Emission Unit Definition
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1(From Mod 1):

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

Emission Unit: 1-DRYR1

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 EITHER of two wood-fired furnaces. The firing of BOTH furnaces concurrently is NOT permitted except in the case where one furnace is throttling down as it is handing-off the drying task to the other furnace that had been throttling up (this would be an attempt to change furnaces while maintaining non-stop drying capability). This EU includes the supplying of dried wood fuel to the Energy Unlimited furnace. This EU includes the rotary kiln drier, the eight-cyclone gang (outdoors), 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 18.2(From Mod 1):

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

Emission Unit: 2-FORM1

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 five 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. Ductwork collects exhausted gases from an enclosed conveyor that carries freshly-minted (hot) pellets to the pellet cooler; these gases contain significant VOCs and are blown to EP00007 for atmospheric release. Cooled pellets are screened to remove fines. These finished and cooled 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

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



building where an automated bagging line fills and seals 40-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 that contain 50 forty-pound bags.

Building(s): Bag Bldg
Mill Bldg
Outdrs LMK

Condition 19: Renewal deadlines for state facility permits
Effective between the dates of 11/03/2014 and 11/02/2024

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

Item 19.1:

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 20: Compliance Demonstration
Effective between the dates of 11/03/2014 and 11/02/2024

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

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

Condition 21: Visible Emissions Limited
Effective between the dates of 11/03/2014 and 11/02/2024



Applicable State Requirement:6 NYCRR 211.2

Item 21.1:

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

Condition 22: Compliance Demonstration
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR 211.2

Item 22.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department. In each Annual Monitoring Report, facility shall provide a list of all such complaints. If no complaints were received, this report shall denote that case as well.

Monitoring Frequency: DAILY

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 23: Emission Point Definition By Emission Unit

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1(From Mod 1):

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

Emission Unit: 1-DRYR1

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 23.2(From Mod 1):

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

Emission Unit: 2-FORM1

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

Emission Point: 00007

Height (ft.): 39

Diameter (in.): 16

NYTMN (km.): 4972.845

NYTME (km.): 508.578

Building: Mill Bldg

Condition 24: Process Definition By Emission Unit

Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 1):

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

Emission Unit: 1-DRYR1

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

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



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 24.2(From Mod 1):

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

Emission Unit: 1-DRYR1
Process: 201 Source Classification Code: 3-90-008-89
Process Description:
This process consists of the operation of the "Energy Unlimited" 55 MMBtu/hr wood-fired furnace.

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

Item 24.3(From Mod 1):

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

Emission Unit: 1-DRYR1
Process: 202 Source Classification Code: 3-90-008-89
Process Description:
This process consists of the operation of the "Torbel" wood-fired fluidized-bed furnace.

Emission Source/Control: BURN2 - Combustion
Design Capacity: 14,880 pounds per hour

Item 24.4(From Mod 1):

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

Emission Unit: 1-DRYR1
Process: 203 Source Classification Code: 3-07-008-04
Process Description:
This process consists of the operation of a rotary kiln dryer (dries wood chips with hot combustion exhaust) and then the removal of these dried wood chips from that hot exhaust airstream in a series-oriented array of eight cyclones.

Emission Source/Control: CYCD1 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD2 - Control
Control Type: CENTRIFUGAL



Emission Source/Control: CYCD3 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD4 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD5 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD6 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD7 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD8 - Control
Control Type: CENTRIFUGAL

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

Item 24.5(From Mod 1):

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

Emission Unit: 1-DRYR1
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 24.6(From Mod 1):

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

Emission Unit: 2-FORM1
Process: 401 Source Classification Code: 3-07-004-05
Process Description:

This process consists of the operation of five pellet mills. Dried and re-sized wood chips are conveyed into these five mills where chips are compressed and formed into wood fuel pellets. Hot pellets are conveyed away. VOCs are released from the conveyor enclosure that links the pellet mills to the pellet cooler. These gases are sucked through an 16" duct and to emission point 00007,



for atmospheric release. This EP needs to be stack tested for VOC concentration.

Emission Source/Control: MILL1 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL2 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL3 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL4 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL5 - Process
Design Capacity: 5 tons per hour

Item 24.7(From Mod 1):

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

Emission Unit: 2-FORM1
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 indoor cyclones and an (LMK) baghouse that together collect PM emissions. The LMK baghouse is outdoors and near the klin area 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 across an open asphalt tarmac 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 24.8(From Mod 1):

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

Emission Unit: 2-FORM1
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

New York State Department of Environmental Conservation

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057



operation of an outdoor baghouse (Source: BAG13). Two outdoor silos store finished softwood or hardwood pellets, 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