

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

**Facility Identification Data**

Name: NORBORD INDUSTRIES  
Address: LAUREL BANK AVE  
DEPOSIT, NY 13754

**Owner/Firm**

Name: NORBORD INDUSTRIES INC  
Address: LAUREL BANK AVE  
PO BOX 26  
DEPOSIT, NY 13754-0026, USA  
Owner Classification: Corporation/Partnership

**Permit Contacts**

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DEPOSIT, NY 13754-0026  
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**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility.

# New York State Department of Environmental Conservation

## Permit Review Report

Permit ID: 4-1230-00019/00055    Renewal Number: 1



04/25/2007

### Attainment Status

NORBORD INDUSTRIES is located in the town of DEPOSIT in the county of DELAWARE. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor

### Facility Description

The Norbord Industries, Inc. facility in Deposit, New York produces various grades of medium density fiberboard (MDF).

### Permit Structure and Description of Operations

The Title V permit for NORBORD INDUSTRIES is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e.

**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion        -        devices which burn fuel to generate heat, steam or power
- incinerator       -        devices which burn waste material for disposal
- control            -        emission control devices
- process            -        any device or contrivance which may emit air contaminants that is not included in the above categories.

NORBORD INDUSTRIES is defined by the following emission unit(s):

Emission unit 1DRYER - This emission unit consists of fiber preparation activities. Raw materials are digested in the chip cooker, then mixed with wax and fed into the refiner where the wood fibers are separated. During upset conditions wood fiber from the refiner is rejected and burned as boiler fuel or disposed of off site. After the refiner, resin and dye (certain product grades only) is added to the fiber. The wood fiber is then flash dried in the tube dryer. The tube dryer is heated by the Coen burner, which is fired by sander dust waste or natural gas. A natural gas fired panel burner can be used for emergency backup. Fiber from the tube dryer is collected in two parallel cyclones and transferred to fiber storage. Emission unit 1DRYER is associated with the following emission points (EP):

10030, 10034, 1034A

It is further defined by the following process(es):

Process: DR1 is located at 1st Floor, Building PLANT - This process is the preparation of wood fiber. Operations include cooking the chips, refining, and mixing with wax, resin and dye (certain products only) from the storage tanks. Emissions are insignificant and vent inside the plant. Reject wood fiber from the refiner is burned as boiler fuel or disposed of off site. Particulate emissions from this process are fugitive and insignificant.

Process: DR2 is located at 1ST FLOOR, Building PLANT - This process is combustion by a Coen burner or panel burner (emergency backup) to provide heat to the tube dryer. The Coen burner fires sander dust created by on site operations. The burner has a maximum rated heat input of 50 mmBtu/hr and a typical maximum actual heat input of 35 mmBtu/hr. The burner also has the capability to fire natural gas. Burner exhaust is passed through a cyclone (CYC30) then to the tube dryer. A pressure relief vent (Hooter Vent, Emission Point 10030) located downstream of the Coen burner, is used to control back pressure in the dryer system. In addition, a natural gas fired panel burner, located at the dryer inlet, can be used as an emergency backup heat source.

Process: DR3 is located at 1ST FLOOR, Building PLANT - This process is the drying of wood fiber in a tube dryer (TBDY). Dried wood fiber is collected in two cyclones (CYC3A and CYC3B), which exhaust to Emission Points 1003A and 1003B, respectively. Emissions from the tube dryer include combustion emissions from the burner, except what is emitted through the hooter vent.

Emission unit 1PRESS - This emission unit consists of fiber mat forming and pressing operations. Fiber from the dryer weigh belt is transferred pneumatically to the fiber storage bin and then to the forming line. Treated fibers are formed and trimmed into fiber mats in the forming line, then pressed into fiberboard in the steam heated press. The fiberboard is unloaded and cooled in the press area before being transferred to the sizing area. Shave off and trim from the forming line is recycled to fiber storage. A process flow diagram is attached (PS003).

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Emission unit 1PRESS is associated with the following emission points (EP):  
10006, 10033, 1033A, 1033B

It is further defined by the following process(es):

Process: PR1 is located at 1st Floor, Building PLANT - This process is the fiber mat forming operation. Fiber is pneumatically conveyed from the dryer weigh belt to the fiber storage bin cyclone (FBCYC) and then to the fiber storage bin. Fiber is then conveyed pneumatically from the fiber storage bin to formers #1 and #2. The formers separate the air from the fiber and the exhaust is discharged through BH009 which vents to EP10006. Exhaust gases from FBCYC pass through BH008 and then through a steam to air heat exchanger and become the make up air for the former feed line fans. Therefore, there is no emission point for BH008. Steam is also injected directly into the make up air for the former fans. Forming line (FORMR) operations include formers, cold pre-press, side trim saw, flying mat saw, and mat reject dump.

Process: PR2 is located at 1st Floor, Building PLANT - This process is the fiberboard press operation. Emissions from the press vent into the press area, then are exhausted outside through EP10015 and EP10016. Emissions from the press unloading area are exhausted outside through EP10017 and EP10018. Emissions from the press cooling/transfer area are captured by an exhaust hood and vent through EP10019.

Emission unit 1RM001 - This emission unit consists of raw material (including recycle) transfer, storage and associated operations. Purchased raw material includes wood chips, green sawdust, and logs. Logs are debarked and chipped on site. Wood chips are unloaded in the infeed dumper and pneumatically conveyed to chip silos no. 1, 2, or 3. Sawdust is unloaded in the infeed dumper and pneumatically conveyed to green sawdust silo no. 4. Surplus chips are stored in an a-frame structure or in outdoor storage piles. Logs, waste bark and other waste wood material is also stored in outdoor storage piles. Raw material from the silos is mechanically conveyed to the fiber preparation area.

Emission unit 1RM001 is associated with the following emission points (EP):  
10001, 10010, 1002A, 10031, 10032

It is further defined by the following process(es):

Process: RM1 is located at OUTSIDE, Building YARD - This process is the debarking and chipping of logs with a wood chipper. Logs from storage are debarked with a ring debarker (DBARK), then chipped in the chipper (CHIPR). Wood chips from the chipper are collected by a cyclone (CYC02, Emission Point 10002), then mechanically conveyed to the chip infeed or directly to chip silo no. 1. This process results in fugitive as well as point source emissions (Emission Point 10002) of particulate matter.

Process: RM2 is located at OUTSIDE, Building YARD - This process is the pneumatic conveying of wood chips and green sawdust from the chip unloader or chipper into the chip silo no. 1 (CSIL1), chip silo no. 2 (CSIL2), chip silo no. 3 (CSIL3), or green sawdust silo no. 4 (CSIL4). Chips are pneumatically conveyed to a cyclone (CYC2A, Emission Point 1002A) to feed CSIL1, to another cyclone (CYC01, Emission Point 10001) to feed CSIL2, or directly to CSIL3 (which vents to BH007, Emission Point 10010). Purchased green sawdust is pneumatically conveyed to CSIL4 (which vents back to CSIL3, then to BH007, Emission Point 10010). Note that sawdust waste from BH003 and BH004 are recycled to BH007 (see Emission Unit 1-SS001).

Process: RM3 is located at Building YARD - This process is the unloading to the infeed dumper and storage of raw material and waste (such as logs, wood chips, sawdust and bark) in outdoor storage piles or an a-frame structure (wood chips only). Fugitive particulate emissions from material handling and wind are insignificant.

Process: RM4 is located at Building YARD - This process is conveying wood chips and/or sawdust

## New York State Department of Environmental Conservation

### Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1

04/25/2007



during raw material transfer. Any resulting fugitive particulate emissions are insignificant.

Process: RM5 is located at Building YARD - The process is a portable chipper (PCHIP), owned and operated by an independent contractor, used to debark and chip logs. The chipping takes place outside and on an as needed basis. The process will be limited to 1000 hours per year. Logs are purchased and stockpiled for use in the chipper. The contractor is called to bring the chipper on site and normally stays for 1 - 2 weeks each time. The chips are discharged onto an outside pile and used as needed. There are two emission points (10031 and 10032) associated with the combustion exhaust from the chipper engine (DENG). There are fugitive wood particulate emissions at the point where the chips are discharged from the chute. The actual chipping operation is enclosed.

Emission unit 1SS001 - This emission unit consists of product sizing and waste material storage. Fiberboard from the press area is trimmed and stacked. Final sizing consists of sanding and sawing. Sander dust is collected and transferred to dust silos no. 1 or 2 for storage. Sawdust and hogged board trim is transferred to dust silo no. 2 or to the saw trim baghouse for recycling.

Emission unit 1SS001 is associated with the following emission points (EP):

10012, 10013, 10022, 10025, 10026, 10027

It is further defined by the following process(es):

Process: SS1 is located at 1ST FLOOR, Building PLANT - This process is fiberboard sanding and sawing operations. The operations include rough trim cutting (ETSAW), board sanding (SANDR) and board sawing (BSAWS). ETSAW vents to BH004 and Emission Point 10025. SANDR vents to BH005 and Emission Point 10012 or to BH006 and Emission Point 10013. BSAWS vents to BH003 and Emission Point 10026.

Process: SS2 is located at 1ST FLOOR, Building PLANT - This process is the conveyance of waste material to silo storage. Sander dust from BH005 and BH006 is conveyed to CYCD1, then DSIL1. CYCD1 vents to BH001, Emission Point 10027. Sawdust and sander dust from BH003, BH004, BH005 and BH006 is conveyed to CYCD2, then DSIL2. CYCD2 vents to BH002, Emission Point 10022. Note that sawdust from BH003 and BH004 can also be transferred to BH007, Emission Point 10010 (see Emission Unit 1-RM001) for recycle to the process.

Emission unit 1BOILR - This emission unit consists of a waste wood/natural gas fired primary boiler and a natural gas fired backup boiler. The boilers provide steam for the chip cooker, refiner, and press, and for building heat.

Emission unit 1BOILR is associated with the following emission points (EP):

10021, 10028

It is further defined by the following process(es):

Process: B01 is located at 1ST FLOOR, Building PLANT - This process is combustion in boiler BLR21.

The 30,000 pound per hour steam boiler exhausts through an electrostatic precipitator (ESP21) to Emission Point 10021. The boiler can fire 100 percent wood waste, 100 percent natural gas, or a blend of wood waste and natural gas.

Process: B02 is located at 1ST FLOOR, Building PLANT - This process is natural gas combustion in the natural gas boiler (BLR28). The 40.8 mmBtu/hr boiler exhausts directly to Emission Point 10028.

### Title V/Major Source Status

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



NORBORD INDUSTRIES is subject to Title V requirements. This determination is based on the following information:

The facility is major because the potential to emit (PTE) for several contaminants is greater than the Title V applicability thresholds. The PTE for carbon monoxide (CO), oxides of nitrogen (NOx), particulates, and particulates less than 10 microns (PM-10) from the facility are each greater than 100 tons per year which is the Title V applicability threshold. The PTE for volatile organic compounds (VOC) is greater than 50 tons per year which is the Title V thresholds. The PTE for formaldehyde and methanol (methyl alcohol) are greater than 10 tons per year which is the Title V threshold. The PTE for total hazardous air pollutants (HAP) is greater than 25 tons per year which is the Title V thresholds.

**Program Applicability**

The following chart summarizes the applicability of NORBORD INDUSTRIES with regards to the principal air pollution regulatory programs:

<b>Regulatory Program</b>	<b>Applicability</b>
PSD	NO
NSR (non-attainment)	YES
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**NOTES:**

**PSD**            Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR**            New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



**NESHAP**        National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

**MACT**        Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS**        New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

**Title IV**        Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

**Title VI**        Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

**RACT**        Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

**SIP**        State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements

# New York State Department of Environmental Conservation

## Permit Review Report

Permit ID: 4-1230-00019/00055    Renewal Number: 1



04/25/2007

### SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2493	RECONSTITUTED WOOD PRODUCTS
9999	NONCLASSIFIABLE ESTABLISHMENTS

### SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-009-05	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Wood/Bark-Fired Boiler (< 50,000 LB STM)
3-90-009-89	IN-PROCESS FUEL USE INDUSTRIAL PROCESSES - IN-PROCESS FUEL USE GENERAL: LPG
3-07-040-01	PULP & PAPER AND WOOD PRODUCTS
3-07-009-60	PULP & PAPER AND WOOD PRODUCTS STORAGE BINS - WOOD/BARK PULP & PAPER AND WOOD PRODUCTS MEDIUM DENSITY FIBERBOARD (MDF) MANUFACTURE BATCH HOT PRESS, UF RESIN
3-07-009-25	PULP & PAPER AND WOOD PRODUCTS MEDIUM DENSITY FIBERBOARD (MDF) MANUFACTURE DIRECT WOOD-FIRED TUBE DRYER, HARDWOODS
3-07-030-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS WOOD WORKING OPERATIONS
3-07-030-01	Sanding/Planning Operations: Specify PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS WOOD WORKING OPERATIONS
3-07-999-99	Wood Waste Storage Bin Vent PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - OTHER NOT CLASSIFIED SEE COMMENT    **
3-07-008-21	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIP STORAGE FILES

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1



04/25/2007

3-07-008-22 PULP & PAPER AND WOOD PRODUCTS  
PULP & PAPER & WOOD - SAWMILL OPERATIONS  
INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIP  
TRANSFER/CONVEYING  
3-07-008-20 PULP & PAPER AND WOOD PRODUCTS  
PULP & PAPER & WOOD - SAWMILL OPERATIONS  
INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIPPING AND  
SCREENING

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE
000106-99-0	1,3-BUTADIENE (HAP)	> 0 but < 10 tpy
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-D IOXIN (HAP)	> 0 but < 10 tpy
000051-28-5	2,4, DINITROPHENOL (HAP)	> 0 but < 10 tpy
000828-00-2	2,4-DIMETHYL-6-ACETOXY-1,3-DIO XANE	> 0 but < 2.5 tpy
0NY507-00-0	40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS	>= 2.5 tpy but < 10 tpy
0NY505-00-0	40 CFR 63 SUBPART LL - POM (HAP)	> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0 but < 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0 but < 10 tpy
007440-38-2	ARSENIC (HAP)	> 0 but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0 but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO- (HAP)	> 0 but < 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0 but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 100 tpy but < 250 tpy
007440-47-3	CHROMIUM (HAP)	> 0 but < 10 tpy

**New York State Department of Environmental Conservation  
Permit Review Report**



**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**

007440-48-4	COBALT (HAP)	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	>= 10 tpy
000110-00-9	FURAN C4H4O	> 0 but < 2.5 tpy
0NY100-00-0	HAP	>= 100 tpy but < 250 tpy
000110-54-3	HEXANE (HAP)	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE (HAP)	> 0 but < 10 tpy
007439-92-1	LEAD (HAP)	> 0 but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0 but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
000100-02-7	PARA-NITROPHENOL (HAP)	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	499000
000108-95-2	PHENOL (HAP)	> 0 but < 10 tpy
0NY075-00-5	PM-10	>= 100 tpy but < 250 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 40 tpy but < 50 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

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

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

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

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

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

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

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

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

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

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

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

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

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

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

**Item G:            Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR**

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

**Part 201-6.5(a)(5)**

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

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

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

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

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

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

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

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

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

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

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

**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.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1



04/25/2007

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	178
1-RM001/-/RM5	40CFR 52-A.21	Prevention of Significant Deterioration	152
FACILITY	40CFR 52-A.21 (i) (1)	Review of Major Stationary Sources and Major Modifications - Source Applicability	29
1-BOILR	40CFR 63-A	Subpart A - General Provisions apply to all NESHAP affected sources	38
1-DRYER/-/DR3	40CFR 63-A	Subpart A - General Provisions apply to all NESHAP affected sources	98
1-PRESS/-/PR2	40CFR 63-A	Subpart A - General Provisions apply to all NESHAP affected sources	127
1-DRYER/-/DR3	40CFR 63-DDDD.2240 (b)	Plywood and Composite Wood Products NESHAP - Compliance options for add-on control systems	99, 100
1-PRESS/-/PR2	40CFR 63-DDDD.2240 (b)	Plywood and Composite Wood Products NESHAP - Compliance options for add-on control systems	128, 129
1-DRYER/-/DR3	40CFR 63-DDDD.2250 (a)	Plywood and Composite Wood Products NESHAP - General requirements	101
1-PRESS/-/PR2	40CFR 63-DDDD.2250 (a)	Plywood and Composite Wood Products NESHAP - General requirements	130
1-DRYER/-/DR3	40CFR 63-DDDD.2260 (a)	Plywood and Composite Wood Products NESHAP - Initial compliance	102
1-PRESS/-/PR2	40CFR 63-DDDD.2260 (a)	Plywood and Composite Wood Products NESHAP - Initial compliance	131
1-DRYER/-/DR3	40CFR 63-DDDD.2260 (b)	Plywood and Composite Wood Products NESHAP - Initial compliance	103
1-PRESS/-/PR2	40CFR 63-DDDD.2260 (b)	Plywood and Composite Wood Products NESHAP - Initial compliance	132
1-DRYER/-/DR3	40CFR 63-DDDD.2261 (a)	Plywood and Composite Wood Products NESHAP - Performance test deadlines	104
1-PRESS/-/PR2	40CFR 63-DDDD.2261 (a)	Plywood and Composite Wood Products NESHAP - Performance test deadlines	133



**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**

1-DRYER/-/DR3	40CFR 63-DDDD.2261 (b)	Plywood and Composite Wood Products NESHAP - Initial compliance demonstration deadline	105
1-PRESS/-/PR2	40CFR 63-DDDD.2261 (b)	Plywood and Composite Wood Products NESHAP - Initial compliance demonstration deadline	134
1-DRYER/-/DR3	40CFR 63-DDDD.2262 (a)	Plywood and Composite Wood Products NESHAP - Performance test provisions	106
1-PRESS/-/PR2	40CFR 63-DDDD.2262 (a)	Plywood and Composite Wood Products NESHAP - Performance test provisions	135
1-DRYER/-/DR3	40CFR 63-DDDD.2262 (h)	Plywood and Composite Wood Products NESHAP - Performance tests and operating requirements	107
1-PRESS/-/PR2	40CFR 63-DDDD.2262 (h)	Plywood and Composite Wood Products NESHAP - Performance tests and operating requirements	136
1-DRYER/-/DR3	40CFR 63-DDDD.2262 (k)	Plywood and Composite Wood Products NESHAP - thermal oxidizer operating requirements	108
1-PRESS/-/PR2	40CFR 63-DDDD.2262 (l)	Plywood and Composite Wood Products NESHAP - Catalytic oxidizer operating requirements	137
1-PRESS/-/PR2	40CFR 63-DDDD.2267	Plywood and Composite Wood Products NESHAP - Initial compliance for reconstituted wood product press or board cooler	138
1-DRYER/-/DR3	40CFR 63-DDDD.2269 (a)	Plywood and Composite Wood Products NESHAP - Monitoring installation, operation, and maintenance provisions	109
1-PRESS/-/PR2	40CFR 63-DDDD.2269 (a)	Plywood and Composite Wood Products NESHAP - Monitoring installation, operation, and maintenance provisions	139
1-DRYER/-/DR3	40CFR 63-DDDD.2269 (b)	Plywood and Composite Wood Products NESHAP - Monitoring installation, operation, and maintenance provisions	110
1-PRESS/-/PR2	40CFR 63-DDDD.2269 (b)	Plywood and Composite Wood Products NESHAP - Monitoring installation, operation, and maintenance provisions	140
1-DRYER/-/DR3	40CFR 63-DDDD.2271 (a)	Plywood and Composite Wood Products NESHAP - Continuous compliance demonstration	111
1-PRESS/-/PR2	40CFR 63-DDDD.2271 (a)	Plywood and Composite	141, 142

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055 Renewal Number: 1**



**04/25/2007**

1-DRYER/-/DR3	40CFR 63-DDDD.2271 (b)	Wood Products NESHAP - Continuous compliance demonstration Plywood and Composite Wood Products NESHAP - Continuous compliance provisions	112
1-PRESS/-/PR2	40CFR 63-DDDD.2271 (b)	Plywood and Composite Wood Products NESHAP - Continuous compliance provisions	143
1-DRYER/-/DR3	40CFR 63-DDDD.2280 (c)	Plywood and Composite Wood Products NESHAP - Notifications	113
1-PRESS/-/PR2	40CFR 63-DDDD.2280 (c)	Plywood and Composite Wood Products NESHAP - Notifications	144
1-DRYER/-/DR3	40CFR 63-DDDD.2280 (d)	Plywood and Composite Wood Products NESHAP - Notifications	114
1-PRESS/-/PR2	40CFR 63-DDDD.2280 (d)	Plywood and Composite Wood Products NESHAP - Notifications	145
1-DRYER/-/DR3	40CFR 63-DDDD.2280 (e)	Plywood and Composite Wood Products NESHAP - Notifications	115
1-PRESS/-/PR2	40CFR 63-DDDD.2280 (e)	Plywood and Composite Wood Products NESHAP - Notifications	146
1-DRYER/-/DR3	40CFR 63-DDDD.2281	Plywood and Composite Wood Products NESHAP - Reporting	116, 117
1-PRESS/-/PR2	40CFR 63-DDDD.2281	Plywood and Composite Wood Products NESHAP - Reporting	147, 148
1-DRYER/-/DR3	40CFR 63-DDDD.2282	Plywood and Composite Wood Products NESHAP - Recordkeeping	118
1-PRESS/-/PR2	40CFR 63-DDDD.2282	Plywood and Composite Wood Products NESHAP - Recordkeeping	149
1-DRYER/-/DR3	40CFR 63-DDDD.2283	Plywood and Composite Wood Products NESHAP - Recordkeeping	119
1-PRESS/-/PR2	40CFR 63-DDDD.2283	Plywood and Composite Wood Products NESHAP - Recordkeeping	150
1-BOILR/-/B01	40CFR 63-DDDDD.7500 (a) (1)	Industrial/Commercial/Ins titutional Boiler NESHAP - Emission Limits and Work Practice Standards	43, 44, 45
1-BOILR/-/B01	40CFR 63-DDDDD.7500 (a) (2)	Industrial/Commercial/Ins titutional Boilers NESHAP - Operating limits	46, 47, 48
1-BOILR/-/B01	40CFR 63-DDDDD.7505 (c)	Industrial/Commercial/Ins titutional Boilers NESHAP - Fuel analysis	49
1-BOILR/-/B01	40CFR 63-DDDDD.7505 (e)	Industrial/Commercial/Ins titutional Boiler NESHAP - St ar tup/shutdown/malfunction	50

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1

04/25/2007



1-BOILR/-/B02	40CFR 63-DDDDD.7506 (b) (1)	plan Industrial, Institutional, and Commercial Boilers & Process Heater NESHAP - Limited Requirements	89
1-BOILR/-/B01	40CFR 63-DDDDD.7507 (a)	Industrial/Commercial/Ins titutional Boiler NESHAP - Alternative HCl standards	51
1-BOILR/-/B01	40CFR 63-DDDDD.7507 (b)	Industrial/Commercial/Ins titutional Boiler NESHAP - Alternative standards for total selected metals (TSM)	52, 53
1-BOILR/-/B01	40CFR 63-DDDDD.7510 (b)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analysis	54
1-BOILR/-/B01	40CFR 63-DDDDD.7510 (d)	Industrial/Commercial/Ins titutional Boiler NESHAP - Initial Compliance	55
1-BOILR/-/B01	40CFR 63-DDDDD.7515	Industrial/Commercial/Ins titutional Boiler NESHAP - Subsequent performance tests	56, 57
1-BOILR/-/B01	40CFR 63-DDDDD.7521 (a)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analyses and procedures	58
1-BOILR/-/B01	40CFR 63-DDDDD.7521 (b)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analyses and procedures	59
1-BOILR/-/B01	40CFR 63-DDDDD.7521 (c)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analyses and procedures	60
1-BOILR/-/B01	40CFR 63-DDDDD.7521 (d)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analyses and procedures	61
1-BOILR/-/B01	40CFR 63-DDDDD.7521 (e)	Industrial/Commercial/Ins titutional Boiler NESHAP - Fuel analyses and procedures	62
1-BOILR/-/B01	40CFR 63-DDDDD.7530 (a)	Industrial/Commercial/Ins titutional Boiler NESHAP - Initial compliance standards	63
1-BOILR/-/B01	40CFR 63-DDDDD.7540 (a)	Industrial/Commercial/Ins titutional Boiler NESHAP - Continuous compliance standards	64, 65, 66, 67
1-BOILR/-/B01	40CFR 63-DDDDD.7540 (b)	Industrial/Commercial/Ins titutional Boiler NESHAP - Continuous compliance	68
1-BOILR/-/B01	40CFR 63-DDDDD.7540 (c)	Industrial/Commercial/Ins titutional Boiler NESHAP - Continuous compliance	69
1-BOILR/-/B01	40CFR 63-DDDDD.7540 (d)	Industrial/Commercial/Ins titutional Boiler NESHAP - Continuous compliance	70
1-BOILR/-/B01	40CFR 63-DDDDD.7545 (a)	Industrial/Commercial/Ins	71

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1

04/25/2007



1-BOILR/-/B01	40CFR 63-DDDDD.7545 (e)	titutitional Boiler NESHAP - Notifications Industrial/Commercial/Ins	72
1-BOILR/-/B01	40CFR 63-DDDDD.7550 (a)	titutitional Boiler NESHAP - Notifications Industrial/Commercial/Ins	73, 74
1-BOILR/-/B01	40CFR 63-DDDDD.7550 (f)	titutitional Boiler NESHAP - Reporting requirements Industrial/Commercial/Ins	75
1-BOILR/-/B01	40CFR 63-DDDDD.7555 (a)	titutitional Boiler NESHAP - Reporting requirements Industrial/Commercial/Ins	76
1-BOILR/-/B01	40CFR 63-DDDDD.7555 (c)	titutitional Boiler NESHAP - Recordkeeping Industrial/Commercial/Ins	77
1-BOILR/-/B01	40CFR 63-DDDDD.7555 (d)	titutitional Boiler NESHAP - Recordkeeping Industrial/Commercial/Ins	78
1-BOILR/-/B01	40CFR 63-DDDDD.7560	titutitional Boiler NESHAP - Recordkeeping Industrial/Commercial/Ins	79, 80,
FACILITY	40CFR 64	titutitional Boiler NESHAP - Recordkeeping COMPLIANCE ASSURANCE	81 34
FACILITY	40CFR 68	MONITORING Chemical accident	20, 21
FACILITY	40CFR 82-F	prevention provisions Protection of	22
FACILITY	6NYCRR 200.6	Stratospheric Ozone - recycling and emissions reduction	
FACILITY	6NYCRR 200.7	Acceptable ambient air	1
FACILITY	6NYCRR 201-1.4	quality. Maintenance of equipment.	9
FACILITY	6NYCRR 201-1.7	Unavoidable noncompliance	179
FACILITY	6NYCRR 201-1.8	and violations Recycling and Salvage	10
FACILITY	6NYCRR 201-3.2 (a)	Prohibition of	11
FACILITY	6NYCRR 201-3.3 (a)	reintroduction of collected contaminants to the air	
FACILITY	6NYCRR 201-6	Exempt Activities - Proof of eligibility	12
FACILITY	6NYCRR 201-6.5 (a) (4)	Trivial Activities - proof of eligibility	13
FACILITY	6NYCRR 201-6.5 (a) (7)	Title V Permits and the Associated Permit	23, 35, 36
FACILITY	6NYCRR 201-6.5 (a) (8)	Conditions	
FACILITY	6NYCRR 201-6.5 (c) (2)	General conditions	14
FACILITY	6NYCRR 201-6.5 (c) (3) (ii)	General conditions	15
Fees 2		Permit conditions for	3
FACILITY		Recordkeeping and	
FACILITY		Reporting of Compliance	
FACILITY		Monitoring	
FACILITY		Permit conditions for	4
FACILITY		Recordkeeping and	
FACILITY		Reporting of Compliance	
FACILITY		Monitoring	
FACILITY		Permit conditions for	5
FACILITY		Recordkeeping and	

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1



04/25/2007

		Reporting of Compliance Monitoring	
FACILITY	6NYCRR 201-6.5(d) (5)	Compliance schedules	16
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	24, 25
FACILITY	6NYCRR 201-6.5(f)	Operational flexibility	26
FACILITY	6NYCRR 201-6.5(f) (6)	Off Permit Changes	17
FACILITY	6NYCRR 201-6.5(g)	Permit shield	27
FACILITY	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	28, 29, 37
1-RM001/-/RM5	6NYCRR 201-7.2	Emissions capping using synthetic minor permits	152
FACILITY	6NYCRR 202-1.1	Required emissions tests.	18
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	6
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	7
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	180
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	19
1-DRYER/-/DR3	6NYCRR 212.10	NOx and VOC RACT required at major facilities	95
1-BOILER/-/B01	6NYCRR 212.10(c) (3)	NOx and VOC RACT required at major facilities	42
1-DRYER	6NYCRR 212.10(c) (3)	NOx and VOC RACT required at major facilities	90
1-PRESS/-/PR2	6NYCRR 212.10(c) (4) (iii)	General Process Emission Sources - NOx and VOC RACT required at major facilities	124
1-RM001/10001	6NYCRR 212.3(b)	General Process Emission Sources - emissions from existing emission sources	163, 164
1-DRYER/-/DR3	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	181
1-PRESS/-/PR2	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	182
1-BOILER/-/B01	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	39, 40, 41
1-DRYER/-/DR2	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	91, 92
1-DRYER/-/DR3	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	93, 94
1-PRESS/-/PR1	6NYCRR 212.4(c)	General Process Emission Sources - emissions from new processes and/or modifications	120, 121
1-PRESS/-/PR2	6NYCRR 212.4(c)	General Process Emission Sources - emissions from	122, 123

# New York State Department of Environmental Conservation

## Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1

04/25/2007



1-PRESS/10006/PR1	6NYCRR 212.4 (c)	new processes and/or modifications General Process Emission Sources - emissions from new processes and/or modifications	151
1-RM001/10010	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	165, 166, 167
1-RM001/1002A	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	168, 169
1-SS001	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	170, 171
1-SS001/10012	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	172
1-SS001/10013	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	173
1-SS001/10022	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	174
1-SS001/10025	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	175
1-SS001/10026	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	176
1-SS001/10027	6NYCRR 212.4 (c)	General Process Emission Sources - emissions from new processes and/or modifications	177
FACILITY	6NYCRR 212.6 (a)	General Process Emission Sources - opacity of emissions limited	30, 31
FACILITY	6NYCRR 215	Open Fires	8
FACILITY	6NYCRR 225-1.2 (a) (2)	Sulfur in Fuel Limitations Post 12/31/87.	32
1-RM001/-/RM5/DENGN	6NYCRR 225-1.2 (a) (2)	Sulfur in Fuel Limitations Post 12/31/87.	153
FACILITY	6NYCRR 225-1.8	Reports, sampling and analysis.	33
1-RM001/-/RM5/DENGN	6NYCRR 225-1.8 (a)	Reports, sampling and analysis.	154
1-BOILR/-/B02	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	82, 83
1-RM001/-/RM5/DENGN	6NYCRR 227-1.3 (a)	Smoke Emission Limitations.	155, 156
1-BOILR/-/B02	6NYCRR 227-1.6 (a)	Corrective Action.	84
1-RM001/-/RM5/DENGN	6NYCRR 227-1.6 (a)	Corrective Action.	157
1-BOILR/-/B02	6NYCRR 227-1.6 (b)	Corrective Action:	85



**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**

1-RM001/-/RM5/DENGN	6NYCRR 227-1.6(b)	Facility Shutdown. Corrective Action: Facility Shutdown.	158
1-BOILR/-/B02	6NYCRR 227-1.6(c)	Corrective Action: Facility Shutdown Prohibitions.	86
1-RM001/-/RM5/DENGN	6NYCRR 227-1.6(c)	Corrective Action: Facility Shutdown Prohibitions.	159
1-BOILR/-/B02	6NYCRR 227-1.6(d)	Corrective Action: Facility Shutdown Prohibitions.	87
1-RM001/-/RM5/DENGN	6NYCRR 227-1.6(d)	Corrective Action: Facility Shutdown Prohibitions.	160
1-BOILR/-/B02	6NYCRR 227-2.4(d)	RACT for Oxides of Nitrogen - small boilers.	88
1-RM001/-/RM5/DENGN	6NYCRR 227-2.4(f)(2)(ii)	Emission limitation for NOx for lean burn internal combustion engines with compression ignition sources	161, 162
1-DRYER/-/DR3	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	96, 97
1-PRESS/-/PR2	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	125, 126
1-RM001/-/RM5	6NYCRR 231-2	New Source Review in Nonattainment Areas and Ozone Transport Region	152

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.4

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, NORBORD INDUSTRIES has been determined to be subject to the following regulations:

40CFR 52-A.21

This citation applies to facilities that are subject to Prevention of Significant Deterioration provisions; ie: facilities that are located in an attainment area and that emit pollutants which are listed in 40 CFR 52.21(b)(23)(i) .

40CFR 52-A.21 (i) (1)

Any stationary source or modification to which the requirements of this regulation apply cannot begin construction without a valid permit.

40CFR 63-A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40CFR63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

Section 63.1 relates to general applicability considerations both before and after promulgation of standards for a source category. Section 63.2 contains definitions common to the MACT rules. Section

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



63.3 contains units and abbreviations used in the MACT rules. Section 63.4 outlines generally prohibited activities such as operating in noncompliance with applicable standards and circumventing the rules. Section 63.5 describes how construction or reconstruction trigger requirements for preconstruction review.

Section 63.6 covers compliance issues such as how default new source and existing source compliance dates are calculated for each MACT rule; operation and maintenance requirements; startup, shutdown, and malfunction plan requirements; methods for determining compliance; alternative emission standards; compliance extensions; and compliance exemptions.

Section 63.7 covers performance testing requirements such as default notification and test deadlines; quality assurance programs: site-specific test plans; test facilities; general test conduct requirements; use of alternative test methods; data analysis, recordkeeping, and reporting; and performance test waivers.

Section 63.8 covers default monitoring requirements for continuous or periodic parameter monitoring, continuous opacity monitoring, and continuous emission monitoring.

Section 63.9 contains default notification requirements and deadlines for initial notifications, requests for extension of compliance, notification that a source is subject to special compliance requirements, continuous monitoring related notifications, and notifications of compliance status (also referred to as initial compliance reports).

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40CFR 63-DDDD.2240 (b)

This condition lists the options for control if the facility chooses to control its plywood or composite wood production processes by using an add-on control device. The options include a percent reduction in the hazardous air pollutant emissions, or the reduction of the concentration of the hazardous air pollutants to a certain level.

40CFR 63-DDDD.2250 (a)

This condition requires the facility to be in compliance with the requirements of the plywood and composite wood production NESHAP rule at all times, except during times when the production line or the equipment for controlling air pollution are starting up, shutting down, or malfunctioning.

40CFR 63-DDDD.2260 (a)

This condition reduces the emissions of hazardous air pollutants from plywood and composite wood manufacturing processes by requiring the facility to perform an initial performance test to measure the amount of hazardous air pollutants being emitted from the process and making sure that the emissions are less than the emission limit listed in this rule.

This condition refers the facility to table 4 of this rule which lists the methods that the facility needs to use

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



to properly measure the amount of hazardous air pollutants being emitted. The facility must also measure the operating parameter listed in table 2 which will be monitored during normal operations and used to determine if the facility is continuously in compliance with the emission limit in this rule.

40CFR 63-DDDD.2260 (b)

This condition reduces the emissions of hazardous air pollutants from plywood and composite wood manufacturing processes by requiring the facility to perform an initial performance test to measure the amount of hazardous air pollutants being emitted from the process and making sure that the emissions are less than the emission limit listed in this rule.

This condition refers the facility to tables 5 and 6 of this rule which lists the compliance options that the facility may choose to comply with the emission limit in this rule and what the facility must do in order to prove that their process is meeting that limit.

40CFR 63-DDDD.2261 (a)

This condition requires the facility to conduct the performance test which proves that the emissions from the plywood and composite wood process is less than the emission limit in this rule no later than 180 days after the date that the facility must be in compliance with this rule.

40CFR 63-DDDD.2261 (b)

If the facility does not need to do a performance test in order to prove that the hazardous air pollutant emissions from the plywood and composite wood processes are less than the emissions limits of this rule, then this condition requires the facility to demonstrate that the emissions comply with the limits no later than 30 days after the date which the facility is required to be in compliance with the rule.

40CFR 63-DDDD.2262 (a)

This condition lists the requirements that the facility must follow in order to properly measure the emissions from the plywood and composite wood processes during the performance test

40CFR 63-DDDD.2262 (h)

This condition shows how the facility must calculate the percent reduction of hazardous air pollutants when a device is installed to control the air pollution from the plywood and composite wood processes.

40CFR 63-DDDD.2262 (k)

This condition explains how the facility must establish parameters during the performance test which they can monitor during normal operation of the plywood and composite wood processes to ensure that the facility is meeting the emission limits in this rule. For a thermal oxidizer, the facility must monitor the temperature in the firebox during the performance test while the emissions of hazardous air pollutants are within the limits in this rule. The temperature in the firebox will then become an operating parameter that the facility must meet in order to prove that they are continuously meeting the emission limit.

40CFR 63-DDDD.2262 (l)

This condition explains how the facility must establish parameters during the performance test which they can monitor during normal operation of the plywood and composite wood processes to ensure that the facility is meeting the emission limits in this rule. For a catalytic oxidizer, the facility must monitor the temperature at the inlet to the catalyst bed or the temperature in the combustion chamber during the

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



performance test while the emissions of hazardous air pollutants are within the limits in this rule. That temperature will then become an operating parameter that the facility must meet in order to prove that they are continuously meeting the emission limit.

40CFR 63-DDDD.2267

This condition explains how a facility that is using a reconstituted wood product press or a board cooler in their plywood or wood composite production line can prove that the equipment is meeting the emission limits for hazardous air pollutants in this rule. This condition requires that the facility install an enclosure around the equipment or capture the emissions from these equipment.

40CFR 63-DDDD.2269 (a)

This condition explains how the facility must operate the equipment that gets installed to continuously monitor the parameters which are used to prove that the plywood or wood composite product lines are in compliance with the emission limits in this rule.

40CFR 63-DDDD.2269 (b)

This condition explains how the facility must operate the equipment that gets installed to continuously monitor the temperature when that is used to prove that the plywood or wood composite product lines are in compliance with the emission limits in this rule.

40CFR 63-DDDD.2271 (a)

This condition explains how the facility will continuously prove that the plywood and wood composite production lines are always emitting less hazardous air pollutants than what the emission limits of this rule allow.

40CFR 63-DDDD.2271 (b)

This condition requires that the facility report to NYSDEC whenever the monitoring of the plywood or wood composite production lines shows that the emissions from these lines are exceeding the emission limits for hazardous air pollutants in this rule. These instances are deviations and include periods where the equipment was starting up, shutting down, or malfunctioning.

40CFR 63-DDDD.2280 (c)

This condition requires that the facility must notify NYSDEC within 60 days of conducting a performance test.

40CFR 63-DDDD.2280 (d)

This condition requires that the facility must submit a Notification of Compliance Status to NYSDEC which explains the results of the performance test and proves that the plywood or wood composite production lines are meeting the emission limits of this rule. This notification also shows which parameters the facility is going to monitor in order to prove that the emission limits are continuously going to be met.

40CFR 63-DDDD.2280 (e)

This condition requires the facility to notify NYSDEC at least 30 days before the deadline for the facility to come into compliance with this rule if the facility wishes to request an exemption for routine maintenance of the control device equipment.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

40CFR 63-DDDD.2281

This condition establishes which reports the facility must send to NYSDEC in order to show that the plywood or wood composite production lines are meeting the emission limits for hazardous air pollutants in this rule. The reports include a semiannual compliance report listing whether there were deviations from any of the requirements in this rule and if there were deviations the report must contain detailed information about the time and duration of the deviation.

40CFR 63-DDDD.2282

This condition explains the records that the facility must keep on site in order to prove that the plywood and wood composite production lines are continuously meeting the hazardous air pollutant limits in this rule.

40CFR 63-DDDD.2283

This condition explains in what form and how long the facility must keep the records that are required to prove that the plywood and wood composite lines are continuously in compliance with the emission limits in this rule.

40CFR 63-DDDDD.7500 (a) (1)

This condition reduces the emissions of hazardous air pollutants from boilers by establishing a limit which the facility is not allowed to exceed at any time. The limits exist for particulate matter, hydrochloric acid, carbon monoxide, and mercury and are expressed as either pounds of pollutant per million Btu of heat input, or in terms of concentration of the pollutant in parts per million at the point that it is released into the atmosphere.

40CFR 63-DDDDD.7500 (a) (2)

This condition establishes the operating parameter that the facility must monitor in order to prove that the boiler is meeting the emission limit for hazardous air pollutants. The facility must do a performance test in order to ensure that the boiler is meeting the emission limit in the rule, and then while the boiler is meeting that limit, the facility must measure the operating limit listed in this condition so that during normal operation the facility knows that as long as the operating limit is met, the boiler is meeting the emission limit.

40CFR 63-DDDDD.7505 (c)

This condition allows the facility to prove that the emission limits in this rule are being met by analyzing the fuel instead of doing performance tests. The fuel analysis must show that the emission limits are being met.

40CFR 63-DDDDD.7505 (e)

This condition requires the facility to develop a plan to deal with hazardous air pollutant emissions from the boiler(s) during periods when the boiler(SE) are starting up, shutting down, or malfunctioning.

40CFR 63-DDDDD.7506 (b) (1)

Existing large and limited use gaseous fueled boilers and process heaters are subject to only the initial notification requirements in 40 CFR 63.9 (b). They are not subject to the emission limits, work practice standards, performance testing, monitoring, site specific monitoring plans, recordkeeping and reporting

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

requirements of 40 CFR 63, Subpart DDDDD or 40 CFR 63, Subpart A.

40CFR 63-DDDDD.7507 (a)

This condition sets allows the facility to prove that the impacts of the emissions of hydrochloric acid are below what the impacts would be if the boiler(s) were meeting the emission limit for HCl listed in this rule. The facility must submit a modelling analysis calculating what the emissions would be outside of the property lines and comparing the results of these calculations to a table. The method for doing this calculations and the look-up tables are listed in Appendix A of this rule.

40CFR 63-DDDDD.7507 (b)

This condition sets allows the facility to prove that the impacts of the emissions of hydrochloric acid are below what the impacts would be if the boiler(s) were meeting the emission limit for HCl listed in this rule. The facility must submit a modelling analysis calculating what the emissions would be outside of the property lines and comparing the results of these calculations to a table. The method for doing this calculations and the look-up tables are listed in Appendix A of this rule.

40CFR 63-DDDDD.7510 (b)

This condition lists how the facility should initially prove that their emissions of hazardous air pollutants are meeting the emission limits for the boiler if the facility chooses to analyze the fuel being burned.

40CFR 63-DDDDD.7510 (d)

This condition requires that a facility with boilers that are considered existing must initially prove that the emission limits for hazardous air pollutants are being met within 180 days after the date the facility is supposed to come into compliance with this rule.

40CFR 63-DDDDD.7515

This condition requires that the facility do a performance test to prove that the boilers are meeting the hazardous air pollutant emission limits of this rule at least once per year. This condition does allow the facility to do the tests less frequently if the tests show the boilers are meeting the emission limits for three years in a row, but if the facility fails a future test, the schedule goes back to an annual basis.

40CFR 63-DDDDD.7521 (a)

This condition lists what the facility will have to do if they want to show that their boilers are emitting less hazardous air pollutants than the emission limits in this rule by analyzing the fuel being burned. This condition shows the methods for measuring the pollutants contained in the fuel and calculating their concentration and if that concentration is less than the emission limit then it is in compliance without needing the performance testing required in other parts of this rule.

40CFR 63-DDDDD.7521 (b)

This condition requires the facility to submit a fuel analysis plan specific to the facility if the facility is choosing to show that they meet the hazardous air pollutant emission limit of this rule by analyzing the fuel being burned in the boilers. The plan must spell out items like the locations of where the samples are taken, who is taking the samples, and which methods are used to take the samples.

40CFR 63-DDDDD.7521 (c)

This condition requires that if the facility is choosing to show that their boilers meet the emission limits

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



for hazardous air pollutants in this rule by analyzing the fuel being burned, then the facility must take three samples for each fuel type.

40CFR 63-DDDDD.7521 (d)

This condition lists how the facility is supposed to prepare the samples that it takes in order to show that the boilers are meeting the emission limits for hazardous air pollutants in this rule by analyzing the fuel being burned.

40CFR 63-DDDDD.7521 (e)

This condition lists which methods the facility is supposed to use in order to calculate how much of the pollutant is contained in the fuel being burned in the boilers.

40CFR 63-DDDDD.7530 (a)

This condition explains how the facility is required to initially prove that the emissions from the boilers are meeting the hazardous air pollutant limits listed in this rule. The facility is required to also establish the parameters that will be monitored to determine that the boiler is operating continuously within the emission limits.

40CFR 63-DDDDD.7540 (a)

This condition explains what the facility will have to do in order to prove that their emissions of hazardous air pollutants are lower than the emission limits in this rule for their boilers during normal operation of the boiler.

40CFR 63-DDDDD.7540 (b)

This condition requires the facility to report every time that their monitoring shows that the operation of their boiler(s) is not meeting the emission limits for hazardous air pollutants in this rule. The facility must also report every instance when the monitoring showed that the emission limit was not being met during periods where the boiler(s) was starting up, shutting down, or malfunctioning.

40CFR 63-DDDDD.7540 (c)

During periods of startup, shutdown, and malfunction, the facility must operate in accordance with the Startup, Shutdown, and Malfunction Plan as required in 40 CFR 63. 7505(e).

40CFR 63-DDDDD.7540 (d)

This condition states that if the facility's monitoring shows that the emissions of hazardous air pollutants were higher than the emission limits in this rule during a time when the boilers were starting up, shutting down, or malfunctioning, the exceedance may not be a violation if the facility was operating accordance to the startup, shutdown, malfunction plan. This plan is required under the general provisions of part 63 (Subpart A) and spell out the measures the facility will take in order to minimize the emissions of hazardous air pollutant during those times that the boiler is starting up, shutting down, or malfunctioning.

40CFR 63-DDDDD.7545 (a)

This condition lists the notifications that the facility is required to send to NYSDEC in order to show that they are subject to this rule or to show how they will meet the requirements of this rule.

40CFR 63-DDDDD.7545 (e)

## New York State Department of Environmental Conservation

### Permit Review Report

Permit ID: 4-1230-00019/00055    Renewal Number: 1

04/25/2007



This condition requires the facility to submit a Notification of Compliance Status report 60 days after they do their performance test or initially measure their emissions of hazardous air pollutants. This report will list how the facility is going to continuously prove that their emissions of hazardous air pollutants are staying under the limits in this rule.

#### 40CFR 63-DDDDD.7550 (a)

This condition lists all of the reports that the facility must submit to NYSDEC which show whether the facility is meeting the limits for hazardous air pollutants in this rule. These reports include a report submitted twice per year which lists whether the facility met the emission limits in this rule for their boilers. Also the facility must immediately report to NYSDEC if there was a startup, shutdown, or malfunction for which the facility did not respond according to the startup/shutdown/malfunction plan.

#### 40CFR 63-DDDDD.7550 (f)

This condition allows the facility to only send in the title V compliance report instead of separately sending in the compliance report that this rule requires. This will only be allowed if all of the information that is asked for in the boiler rule's compliance report is included in the title V compliance report.

#### 40CFR 63-DDDDD.7555 (a)

This condition lists which records the facility needs to keep in order to prove that the emissions of hazardous air pollutants are staying under the emission limits in this rule for their boilers.

#### 40CFR 63-DDDDD.7555 (c)

This condition requires the facility to keep records of any parameter that is required to continuously prove that the emissions of hazardous air pollutants from their boilers are meeting the emission limits of this rule.

#### 40CFR 63-DDDDD.7555 (d)

This condition lists which records the facility needs to keep in order to prove that the emissions of hazardous air pollutants are staying under the emission limits in this rule for their boilers.

#### 40CFR 63-DDDDD.7560

This condition lists how long the facility is supposed to keep records both on-site and off-site. This condition also states that any required records must be kept in a form that allows the records to be available whenever they are needed.

#### 40CFR 64

The federal Compliance Assurance Monitoring (CAM) rule, 40 CFR Part 64, requires monitoring of control device, capture system, and/or process parameters to provide a reasonable assurance of compliance with emission limitations or standards. It applies to emission units that use a control device to comply with certain standards and limitations and that have potential pre-control device emissions equal to or greater than a major source threshold.

Acid Rain program requirements; stratospheric ozone protection requirements; post-1990 New Source Performance Standards, Emission Guidelines, and National Emission Standards for Hazardous Air Pollutants; and some other limitations are exempt from CAM. However, many of the exempt requirements are subject to less stringent periodic monitoring under 40 CFR Part 70 and 6NYCRR

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Subpart 201-6.

6NYCRR 201-6.5 (f)

This regulation defines in general terms under what circumstances changes would be allowed without a permit modification provided the permit contains sufficient operational flexibility provisions.

6NYCRR 201-7.2

This section of Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions permit.

6NYCRR 212 .10

As noted under 6 NYCRR Part 212.10(c)(4)(i), volatile organic compound emission points which are equipped with a capture system and a control device with an overall removal efficiency of at least 81 percent are equipped with reasonably available control technology (RACT).

6NYCRR 212 .10 (c) (3)

Acceptable NOx RACT compliance plans submitted to the Department will become part of the State SIP.

6NYCRR 212 .10 (c) (4) (iii)

This rule allows those sources which cannot achieve an overall removal efficiency of 81% or use coatings that don't exceed 3.5 lbs. VOC/gallon as applied for technological or economic reasons to use process specific reasonably available control technology (RACT) demonstrations for sources of volatile organic compounds (VOC) which are acceptable to the department and have been submitted to EPA for approval as a revision to the State Implementation Plan by the department.

6NYCRR 212 .3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (a)

This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 225-1.2 (a) (2)

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**



This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8

This regulation requires an owner or operator of a facility which purchases and fires coal and/or oil to submit reports to the commissioner containing fuel analysis data, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6NYCRR 227-1.6 (a)

This regulation requires that any facility found in violation of the provisions of Part 227 must not operate the affected stationary combustion installation that is in violation unless it is equipped with approved emission control equipment, it is rehabilitated or upgraded in an approved manner; or the fuel is changed to an acceptable type

6NYCRR 227-1.6 (b)

This regulation states that the Department may seal the affected stationary combustion installation that does not comply with the provisions in subdivision 6 NYCRR 227-1.6(a) within the time provided.

6NYCRR 227-1.6 (c)

This regulation state that no person may operate any affected stationary combustion installation sealed by the commissioner in accordance with this Part 227.

6NYCRR 227-1.6 (d)

This regulation states that no person except Department personnel may remove, tamper with, or destroy any seal affixed to any affected stationary combustion installation.

6NYCRR 227-2.4 (d)

This rule specifies that the reasonably available control technology (RACT) requirement for small boilers (< or = 50 million BTUs/hr) at Title V facilities consists of an annual tune-up.

6NYCRR 227-2.4 (f) (2) (ii)

This regulation sets the NOx emission limit for lean burn engines that provide electrical generation for peak shaving. The limit, which applies to engines listed at 225 horsepower for those in the severe ozone

**New York State Department of Environmental Conservation**



**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**

**04/25/2007**

non-attainment area and 400 horsepower for the rest of the state, is 2.3 grams of NOx per brake horsepower-hour, effective April 1, 2005.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

**Compliance Certification**

Summary of monitoring activities at NORBORD INDUSTRIES:

<b>Location Facility/EU/EP/Process/ES</b>	<b>Type of Monitoring</b>	<b>Cond No.</b>
1-DRYER/-/DR3	record keeping/maintenance procedures	99
1-DRYER/-/DR3	record keeping/maintenance procedures	100
1-PRESS/-/PR2	record keeping/maintenance procedures	128
1-PRESS/-/PR2	record keeping/maintenance procedures	129
1-DRYER/-/DR3	monitoring of process or control device parameters as surrogate	108
1-PRESS/-/PR2	record keeping/maintenance procedures	137
1-PRESS/-/PR2	record keeping/maintenance procedures	138
1-DRYER/-/DR3	monitoring of process or control device parameters as surrogate	111
1-PRESS/-/PR2	record keeping/maintenance procedures	141
1-PRESS/-/PR2	monitoring of process or control device parameters as surrogate	142
1-DRYER/-/DR3	record keeping/maintenance procedures	112
1-PRESS/-/PR2	record keeping/maintenance procedures	143
1-DRYER/-/DR3	record keeping/maintenance procedures	113
1-PRESS/-/PR2	record keeping/maintenance procedures	144
1-DRYER/-/DR3	record keeping/maintenance procedures	114
1-PRESS/-/PR2	record keeping/maintenance procedures	145
1-DRYER/-/DR3	record keeping/maintenance procedures	116
1-DRYER/-/DR3	record keeping/maintenance procedures	117
1-PRESS/-/PR2	record keeping/maintenance procedures	147
1-PRESS/-/PR2	record keeping/maintenance procedures	148
1-DRYER/-/DR3	record keeping/maintenance procedures	118
1-PRESS/-/PR2	record keeping/maintenance procedures	149
1-DRYER/-/DR3	record keeping/maintenance procedures	119
1-PRESS/-/PR2	record keeping/maintenance procedures	150
1-BOILR/-/B01	intermittent emission testing	43
1-BOILR/-/B01	intermittent emission testing	44
1-BOILR/-/B01	intermittent emission testing	45
1-BOILR/-/B01	record keeping/maintenance procedures	46
1-BOILR/-/B01	record keeping/maintenance procedures	47
1-BOILR/-/B01	record keeping/maintenance procedures	48
1-BOILR/-/B01	record keeping/maintenance procedures	51
1-BOILR/-/B01	record keeping/maintenance procedures	52
1-BOILR/-/B01	monitoring of process or control device parameters as surrogate	53
1-BOILR/-/B01	record keeping/maintenance procedures	56
1-BOILR/-/B01	record keeping/maintenance procedures	57



# New York State Department of Environmental Conservation

## Permit Review Report

Permit ID: 4-1230-00019/00055    Renewal Number: 1

04/25/2007

1-BOILR/-/B01	record keeping/maintenance procedures	59
1-BOILR/-/B01	record keeping/maintenance procedures	60
1-BOILR/-/B01	record keeping/maintenance procedures	61
1-BOILR/-/B01	record keeping/maintenance procedures	62
1-BOILR/-/B01	record keeping/maintenance procedures	64
1-BOILR/-/B01	record keeping/maintenance procedures	65
1-BOILR/-/B01	record keeping/maintenance procedures	66
1-BOILR/-/B01	record keeping/maintenance procedures	67
1-BOILR/-/B01	record keeping/maintenance procedures	68
1-BOILR/-/B01	record keeping/maintenance procedures	69
1-BOILR/-/B01	record keeping/maintenance procedures	70
1-BOILR/-/B01	record keeping/maintenance procedures	71
1-BOILR/-/B01	record keeping/maintenance procedures	72
1-BOILR/-/B01	record keeping/maintenance procedures	73
1-BOILR/-/B01	record keeping/maintenance procedures	74
1-BOILR/-/B01	record keeping/maintenance procedures	76
1-BOILR/-/B01	record keeping/maintenance procedures	77
1-BOILR/-/B01	record keeping/maintenance procedures	78
FACILITY	record keeping/maintenance procedures	34
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	24
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	29
1-RM001/-/RMS	work practice involving specific operations	152
FACILITY	record keeping/maintenance procedures	6
1-BOILR/-/B01	record keeping/maintenance procedures	42
1-DRYER	record keeping/maintenance procedures	90
1-PRESS/-/PR2	record keeping/maintenance procedures	124
1-RM001/10001	record keeping/maintenance procedures	163
1-RM001/10001	intermittent emission testing	164
1-BOILR/-/B01	record keeping/maintenance procedures	39
1-BOILR/-/B01	monitoring of process or control device parameters as surrogate	40
1-BOILR/-/B01	intermittent emission testing	41
1-DRYER/-/DR2	intermittent emission testing	91
1-DRYER/-/DR2	record keeping/maintenance procedures	92
1-DRYER/-/DR3	intermittent emission testing	93
1-DRYER/-/DR3	record keeping/maintenance procedures	94
1-PRESS/-/PR1	intermittent emission testing	120
1-PRESS/-/PR1	record keeping/maintenance procedures	121
1-PRESS/-/PR2	intermittent emission testing	122
1-PRESS/-/PR2	record keeping/maintenance procedures	123
1-PRESS/10006/PR1	monitoring of process or control device parameters as surrogate	151
1-RM001/10010	intermittent emission testing	165
1-RM001/10010	monitoring of process or control device parameters as surrogate	166
1-RM001/10010	record keeping/maintenance procedures	167
1-RM001/1002A	intermittent emission testing	168
1-RM001/1002A	record keeping/maintenance procedures	169
1-SS001	intermittent emission testing	170
1-SS001	record keeping/maintenance procedures	171
1-SS001/10012	monitoring of process or control device parameters as surrogate	172
1-SS001/10013	monitoring of process or control device parameters as surrogate	173
1-SS001/10022	monitoring of process or control device parameters as surrogate	174
1-SS001/10025	monitoring of process or control device parameters as surrogate	175
1-SS001/10026	monitoring of process or control device parameters as surrogate	176



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 4-1230-00019/00055 Renewal Number: 1

04/25/2007

1-SS001/10027	parameters as surrogate	
	monitoring of process or control device	177
FACILITY	parameters as surrogate	
	monitoring of process or control device	30
FACILITY	parameters as surrogate	
	record keeping/maintenance procedures	31
FACILITY	record keeping/maintenance procedures	32
1-RM001/-/RM5/DENGN	work practice involving specific operations	153
FACILITY	record keeping/maintenance procedures	33
1-RM001/-/RM5/DENGN	record keeping/maintenance procedures	154
1-BOILR/-/B02	record keeping/maintenance procedures	82
1-BOILR/-/B02	intermittent emission testing	83
1-RM001/-/RM5/DENGN	record keeping/maintenance procedures	155
1-RM001/-/RM5/DENGN	intermittent emission testing	156
1-BOILR/-/B02	record keeping/maintenance procedures	88
1-RM001/-/RM5/DENGN	record keeping/maintenance procedures	161
1-RM001/-/RM5/DENGN	intermittent emission testing	162
1-DRYER/-/DR3	intermittent emission testing	96
1-DRYER/-/DR3	monitoring of process or control device	97
	parameters as surrogate	
1-PRESS/-/PR2	monitoring of process or control device	125
	parameters as surrogate	
1-PRESS/-/PR2	intermittent emission testing	126

**Basis for Monitoring**

Condition 29 --- 6 NYCRR Part 201-7.2 - This monitoring condition has been included in the permit to address the capping/limiting of particulate emissions established to avoid the applicability to the stated regulation (40 CFR 52.21(i)(1), Subpart A). Monitoring and recording the monthly emissions of particulates from the emission unit will demonstrate compliance with the capping condition by indicating the annual maximum on a monthly basis.

Condition 31 --- 6 NYCRR Part 212.6(a) - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 212 - General Process Emission Sources. The daily monitoring frequency is justified by the fact that the rule does not specify any monitoring frequency and any visible emissions that occur are not expected to cause any exceedances. Past experience has shown that the operations contained in the process referenced in this condition are unlikely to produce visible emissions of any magnitude.

Condition 33 --- 6 NYCRR Part 225-1.8 - This regulation requires the owner to maintain records of fuel analyses, quantity of fuel burned, quantity of fuel received, and results of stack tests or monitoring.

Condition 39 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to perform pdaily inspections of the control equipment (electrostatic precipitator (ESP) is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 40 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the electrostatic precipitator (ESP) voltage daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Condition 42 --- 6 NYCRR Part 212.10(c)(3) - This regulation states that reasonably available control technology (RACT) compliance plans must include technically feasible control strategies to minimize nitrogen oxide formation and emission control alternatives. These process specific RACT demonstrations which are acceptable to the Department will be submitted to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan by the Department. The facility is operating under a process specific RACT and is detailed by this monitoring condition. Monitoring the emission unit on a monthly basis and maintaining records will demonstrate compliance with the process specific RACT by showing that the emissions of nitrogen oxides are below the pounds per twelve rolling month limit noted in the monitoring condition.

Condition 43 --- 40 CFR 63.7500(a)(1), Subpart DDDDD - This monitoring condition has been included to address the hydrogen chloride limit contained in the regulation. The facility is required to conduct a fuel analysis once during the term of the permit to demonstrate compliance with the limit and regulation.

Condition 44 --- 40 CFR 63.7500(a)(1), Subpart DDDDD - This monitoring condition has been included to address the mercury limit contained in the regulation. The facility is required to conduct a fuel analysis once during the term of the permit to demonstrate compliance with the limit and regulation.

Condition 45 --- 40 CFR 63.7500(a)(1), Subpart DDDDD - This monitoring condition has been included to address the total selected metals limit contained in the regulation. The facility is required to conduct a fuel analysis once during the term of the permit to demonstrate compliance with the limit and regulation.

Condition 46 --- 40 CFR 63.7500(a)(2), Subpart DDDDD - This monitoring condition has been included to address the hydrogen chloride limit contained in the regulation. The facility is required to maintain the fuel type or fuel mixture such that the emission rate for hydrogen chloride is less than the applicable limit. The facility is required to maintain monthly records to demonstrate compliance with the condition.

Condition 47 --- 40 CFR 63.7500(a)(2), Subpart DDDDD - This monitoring condition has been included to address the mercury limit contained in the regulation. The facility is required to maintain the fuel type or fuel mixture such that the emission rate for mercury is less than the applicable limit. The facility is required to maintain monthly records to demonstrate compliance with the condition.

Condition 48 --- 40 CFR 63.7500(a)(2), Subpart DDDDD - This monitoring condition has been included to address the total selected metals limit contained in the regulation. The facility is required to maintain the fuel type or fuel mixture such that the emission rate for total selected metals is less than the applicable limit. The facility is required to maintain monthly records to demonstrate compliance with the condition.

Condition 51 --- 40 CFR 63.7507(a), Subpart DDDDD - This monitoring condition has been included to allow the facility to demonstrate eligibility for the health based compliance alternative for hydrogen chloride as an alternative to demonstrating compliance with the hydrogen chloride limit noted above.

Condition 52 --- 40 CFR 63.7507(b), Subpart DDDDD - This monitoring condition has been included to allow the facility to demonstrate eligibility for the health based compliance alternative for manganese as an alternative to demonstrating compliance with the total selected metals limit noted above.

Condition 53 --- 40 CFR 63.7507(b), Subpart DDDDD - Based on the facility's health based compliance alternative demonstration, the manganese emissions shall not exceed the specified limit. Compliance shall be determined once

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

during the term of the permit.

Condition 56 --- 40 CFR 63.7515, Subpart DDDDD - This monitoring condition states that the results of any performance test and fuel analyses must be submitted to the Department within sixty days after the completion of such performance tests and/or fuel analyses.

Condition 57 --- 40 CFR 63.7515, Subpart DDDDD - This monitoring condition requires the facility to perform a fuel analysis within five years of the previous fuel analysis or prior to burning a new type of fuel.

Condition 64 --- 40 CFR 63.7540(a), Subpart DDDDD - This monitoring condition requires the facility to maintain records of the type and amount of all fuels burned in the boiler on a monthly basis.

Condition 68 --- 40 CFR 63.7540(b), Subpart DDDDD - This monitoring condition requires the facility to report any deviations on a semiannual basis.

Condition 74 --- 40 CFR 63.7550(a), Subpart DDDDD - This monitoring condition requires the facility to submit a compliance report semiannually. The monitoring condition details the information required to be included in the report.

Condition 77 --- 40 CFR 63.7555(c), Subpart DDDDD - This monitoring condition details what records the facility must keep to be in compliance with the regulation. The records must be maintained on a monthly basis.

Condition 78 --- 40 CFR 63.7555(d), Subpart DDDDD - This monitoring condition details what records the facility must keep to be in compliance with the regulation. The records must be maintained on a monthly basis.

Condition 82 --- 6 NYCRR Part 227-1.3(a) - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 227 - Stationary Combustion Installations. The facility shall monitor the opacity on a daily basis using instantaneous observations. Monitoring the opacity in this manner and recording the results in accordance with the condition will be used to determine the compliance status with the regulation.

Condition 88 --- 6 NYCRR Part 227-2.4(d) - This monitoring condition has been included to address the requirements of 6 NYCRR Part 227-2 - Reasonably Available Control Technology for Oxides of Nitrogen. The facility shall perform an annual boiler tune up to demonstrate compliance with the regulation.

Condition 90 --- 6 NYCRR Part 212.10(c)(3) - This regulation states that reasonably available control technology (RACT) compliance plans must include technically feasible control strategies to minimize nitrogen oxide formation and emission control alternatives. These process specific RACT demonstrations which are acceptable to the Department will be submitted to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan by the Department. The facility is operating under a process specific RACT and is detailed by this monitoring condition. Monitoring the emission unit on a monthly basis and maintaining records will demonstrate compliance with the process specific RACT by showing that the emissions of nitrogen oxides are below the pounds per twelve rolling month limit noted in the monitoring condition.

Condition 92 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Condition 94 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 96 --- 6 NYCRR Part 231-2 - This monitoring condition requires the facility to perform stack testing once during the term of the permit to demonstrate compliance with their lowest achievable emission rate (LAER) limit.

Condition 97 --- 6 NYCRR Part 231-2 - This monitoring condition requires the facility to continuously monitor and record the combustion temperature of the oxidizer to verify that it is above the limit established during stack testing. The temperature is used as a surrogate to demonstrate compliance with the LAER limit contained in the permit noted above.

Condition 107 --- 40 CFR 63.2262(k), Subpart DDDD - This monitoring condition requires the facility to continuously monitor and record the combustion temperature of the oxidizer to verify that it is above the limit established during stack testing. The temperature is used as a surrogate to demonstrate compliance with the limit contained in the regulation and permit.

Condition 110 --- 40 CFR 63.2271(a), Subpart DDDD - This monitoring condition requires the facility to collect and record the three hour block temperature and maintain the temperature above the minimum temperature established during the performance test.

Condition 111 --- 40 CFR 63.2271(b), Subpart DDDD - This monitoring condition requires the facility to report all deviations on a semiannual basis.

Condition 115 --- 40 CFR 63.2281, Subpart DDDD - This monitoring condition requires the facility to submit semiannual compliance reports.

Condition 121 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 125 --- 6 NYCRR Part 231-2 - This monitoring condition requires the facility to continuously monitor and record the combustion temperature of the oxidizer to verify that it is above the limit established during stack testing. The temperature is used as a surrogate to demonstrate compliance with the LAER limit contained in the permit.

Condition 126 --- 6 NYCRR Part 231-2 - This monitoring condition requires the facility to perform stack testing once during the term of the permit to demonstrate compliance with their lowest achievable emission rate (LAER) limit.

Condition 141 --- 40 CFR 63.2271(a), Subpart DDDD - This monitoring condition requires the facility to check the activity level of a representative sample of the catalyst on an annual basis to ensure the catalyst is performing within the design range.

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

Condition 142 --- 40 CFR 63.2271(a), Subpart DDDD - This monitoring condition requires the facility to collect and record the three hour block temperature and maintain the temperature above the minimum temperature established during the performance test.

Condition 143 --- 40 CFR 63.2271(b), Subpart DDDD - This monitoring condition requires the facility to report all deviations on a semiannual basis.

Condition 147 --- 40 CFR 63.2281, Subpart DDDD - This monitoring condition requires the facility to submit semiannual compliance reports.

Condition 151 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 152 --- 6 NYCRR Part 201-7.2 - This monitoring condition has been included in the permit to address the capping/limiting of oxide of nitrogen emissions established to avoid the applicability to the stated regulations (6 NYCRR Part 231-2 and 40 CFR 52.21(i)(1), Subpart A). Monitoring and recording the hours of operation on a daily and monthly basis from the process will demonstrate compliance with the capping condition by indicating the annual maximum on a monthly basis.

Condition 153 --- 6 NYCRR Part 225-1.2(a)(2) - This monitoring condition states that no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 1.5 percent by weight. The facility shall monitor the sulfur content for each delivery to demonstrate compliance with the regulatory limit.

Condition 154 --- 6 NYCRR Part 225-1.8(a) - This regulation requires the owner to maintain records of fuel analyses, quantity of fuel burned, quantity of fuel received, and results of stack tests or monitoring. Specifically, this condition requires the owner to maintain oil supplier certifications on a per delivery basis. The certifications shall include at a minimum supplier name, date of shipment, quantity of fuel received, oil sulfur content, and the method used to determine sulfur content.

Condition 155 --- 6 NYCRR Part 227-1.3(a) - This monitoring condition has been included to address the visible emissions requirements of 6 NYCRR Part 227 - Stationary Combustion Installations. The facility shall monitor the opacity on a daily basis using instantaneous observations. Monitoring the opacity in this manner and recording the results in accordance with the condition will be used to determine the compliance status with the regulation.

Condition 163 --- 6 NYCRR Part 212.3(b) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 166 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 167 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions and log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 169 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 171 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to observe visible emissions and log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation.

Condition 172 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 173 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 174 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 175 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate

**New York State Department of Environmental Conservation**

**Permit Review Report**

**Permit ID: 4-1230-00019/00055    Renewal Number: 1**



**04/25/2007**

emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 176 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.

Condition 177 --- 6 NYCRR Part 212.4(c) - This monitoring condition has been included to address the particulate emission requirements of 6 NYCRR Part 212 - General Process Emission Sources. The requirement to log the pressure drop across the fabric filter once daily is justified by the fact that the rule does not specify any monitoring frequency to determine compliance with the regulation. Operating and maintaining the emission sources as stated in the monitoring condition will demonstrate compliance with the regulation. Compliance with this condition satisfies the compliance assurance monitoring (CAM) contained in 40 CFR 64.