

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-1548-00008/00081 Modification Number: 5



09/21/2006

Facility Identification Data

Name: INTERNATIONAL PAPER TICONDEROGA MILL
Address: 568 SHORE AIRPORT RD
TICONDEROGA, NY 12883

Owner/Firm

Name: INTERNATIONAL PAPER CO
Address: 6400 POPLAR AVE
MEMPHIS, TN 38197, USA
Owner Classification: Corporation/Partnership

Permit Contacts

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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

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This application is to authorize a 2 week trial burning tire-derived fuel along with wood and oil in the power boiler.

Attainment Status

INTERNATIONAL PAPER TICONDEROGA MILL is located in the town of TICONDEROGA in the county of ESSEX.

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

Fully integrated pulp and paper manufacturer of printing and reprographic papers. Facility processes hardwood and softwood pulp log and chip raw materials using the kraft process. Converted kraft pulp is washed, bleached and prepared for finishing by paper machines. Parent rolls produced by the machines are rewound and cut into smaller various width rolls for in-house finishing or direct shipment to customers. Rolls sent for in-house finishing are cut into sheets to meet customer specifications, packaged and stored in on-site warehousing to await shipping to customer.

Permit Structure and Description of Operations

The Title V permit for INTERNATIONAL PAPER TICONDEROGA MILL 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



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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. 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.

INTERNATIONAL PAPER TICONDEROGA MILL is defined by the following emission unit(s):

Emission unit POWERH - The power boiler is a multi-fuel boiler that fires no. 6 fuel oil, waste fuel type "A", wood residue consisting of bark, wood and sawdust, rejected digester wood knots, primary clarifier fiber and dried secondary biomass for the production of steam and electricity via a turbine generator. In addition, the power boiler is used to treat non-condensable gases (ncgs), which are produced in the pulping and chemical recovery processes, through thermal oxidation.

For this modification, the boiler will fire a combination of oil, wood and tire derived fuel during a two week trial and testing period.

It is not an incinerator and incinerator regulations such as 6NYCRR Part 219 and 40CFR61 Subpart E do not apply.

Emission unit POWERH is associated with the following emission points (EP):
00044

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

Process: 106 is located at Building 29 - Firing No. 6 fuel oil or waste fuel type "A" in the power boiler.

Process: 107 is located at Building 29 - Firing bark and wood in the power boiler. The bark/wood firing rate shall not exceed 547 wet tons per day.

Process: 108 is located at Building 29 - Firing dewatered secondary biosolids in the power boiler. The dewatered secondary biosolids shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) dewatered biosolids homogeneously with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered biosolids fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of dewatered biosolids to the woodyard.

Process: 109 is located at Building 29 - Firing primary clarifier fiber in the power boiler. The dewatered primary clarifier fiber shall be mixed with the wood/bark fuel in the woodyard prior to feeding to the bark hogger according to the following procedure: Mix one front end loader bucket (3 cubic yards) fiber homogeneously with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered primary

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clarifier fiber fed to the boiler shall not exceed 40 cubic yards per day.

Process: 111 is located at Building 29 - Non-condensable gases (NCGs) recovered by the pulping and chemical recovery processes are treated by thermal oxidation in the power boiler. The NCGs are collected by a network of fans and piping and fed to the power boiler.

Process: 113 is located at Building 29 - Firing rejected digester knots in the power boiler. The knots shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) knots homogeneously with a minimum of 30 cubic yards of wood/bark. The total quantity of knots fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of knots to the woodyard.

Process: TDF is located at Building 29 - During a two week trial and testing period, tire-derived fuel (TDF) will be combusted in the boiler along with number 6 fuel oil and wood. The TDF loading will not exceed 3 tons per hour and the total heat input to the boiler will not exceed 748 MMBtu per hour. TDF will be added to wood in the woodyard and pneumatically conveyed with the wood to the boiler. During the first week, TDF will be added in gradually increasing amounts while the boiler operators adjust the boiler to achieve optimum combustion conditions. During the second week, extensive stack testing will be performed to characterize emissions.

Whenever TDF is being burned, facility personnel will monitor scrubber filtrate recirculation rate, SO₂ emission rate, NO_x emission rate and stack opacity (during daylight hours). If any of these indicators exceed permit limits, the facility will stop adding TDF until the conditions have stabilized and are in compliance.

During the first week, PM emissions will be measured (using EPA Method 5) while TDF is added at 1 ton per hour (TPH); 2 TPH; and 3 TPH. If PM emissions exceed 0.10 pounds per MMBtu, the facility will stop adding TDF.

Emission unit PULPIN - This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulp washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for inorganic chemical recovery in the recovery boiler.

Emission unit PULPIN is associated with the following emission points (EP):
00084, 00085, 00086, 00088, 00089, 00090, 00091, 00100, 00105, 00106, 00107

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

Process: 120 is located at BUILDINGS 6 & 29, Building 6 - This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulping and washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for inorganic chemical recovery in the recovery boiler. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA.

Process: 124 is located at Building 29 - Venting non-condensable gases to the atmosphere from the non-condensable gas collection system.

Emission unit RECOVB - The recovery boiler emission unit consists of a kraft recovery furnace and a smelt dissolving tank. The recovery furnace fires black liquor and number 6 oil to produce steam for manufacturing operations and smelt. Smelt (sulfur and sodium chemicals recycled in the draft process)

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flows from the bottom of the recovery boiler into the smelt dissolving tank to form green liquor. Recovery emissions flow through an electrostatic precipitator. Smelt dissolving tank emissions flow through a wet impact wet scrubber.

Emission unit RECOVB is associated with the following emission points (EP):
00001, 00003, 00103

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

Process: 103 is located at Building 29 - BABCOCK AND WILCOX RECOVERY FURNACE FIRED ON BLACK LIQUOR.

Process: 104 is located at Building 29 - Babcock and Wilcox recovery furnace fired on 1.5% sulfur #6 fuel oil.

Process: 105 is located at Building 29 - Smelt dissolving tank where smelt from a recovery boiler is dissolved in weak wash to produce green liquor.

Emission unit BPLANT - Bleach plant area source: The bleach plant whitens brown pulp for writing paper production.

Emission unit BPLANT is associated with the following emission points (EP):
00004, 00078, 00079, 00080, 00081, 00082, 00083

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

Process: 116 is located at Building 6 - The bleach plant whitens brown pulp for writing paper production.

Process: 117 is located at Building 6 - Processes that do not vent to the bleach plant scrubber include: the second bleaching stage (#20 tower), the fourth bleaching stage (#40 tower) and four bleached pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission unit RCAUST - Reausticizing area source: the Ticonderoga Mill reausticizing area performs the following tasks: clarifies green liquor from the smelt dissolving tank. - produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers. - clarifies white liquor slurry producing white liquor for use in the digester. - washes, stores and feeds lime mud from the white liquor clarifiers and converts it into "burnt " lime through a process called "calcining" in the lime kiln. Equipment in the reausticizing area includes one green liquor clarifier, two green liquor storage tanks, one lime slaker, three causticizers, 2 white liquor clarifiers, two white liquor storage tanks, one white liquor receiver tank, one sewer clarifier, one mud washer tank, one weak wash storage tank, sodium hydrosulfide storage tank, lime mud mix tank, lime mud storage tank, sewer clarifier filter hood vent, dregs filter hood vent, mud filter hood vent, and vacuum pumps for the sewer clarifier and dregs filters.

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

00005, 00006, 00008, 00018, 00019, 00020, 00034, 00043, 00108, 00109, 00113, 00114, 00115, 00116, 00117, 00118, 00119, 00120, 00121, 00123, 00124

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

Process: 114 is located at Building 19 - The reausticizing area clarifies green liquor from the smelt dissolving tank, produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers, and clarifies white liquor slurry producing white liquor for use in the digester.

Process: 115 is located at Building 19 - THE LIME KILN CONVERTS LIME MUD TO BURNT LIME THROUGH A PROCESS CALLED "CALCINING".

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Emission unit WOODYD - The woodyard processing area provides delivery and storage of wood chips, round wood delivery, debarking, chipping, and chip screening. Wood chips are pneumatically blown to chip piles with 4 chip blowers. Two cyclones in the woodroom receive wood chips blown pneumatically from the chip storage area.

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

00011, 00017, 00068, 00069, 00070, 00071, 00099

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

Process: 101 is located at BUILDINGS 16 & 54, Building 16 - Chips pneumatically blown to chip piles through five discharge points.

Process: 102 is located at Building 9 - Chips pneumatically blown to woodroom through two cyclones.

Emission unit 0WWTRT - Wastewater treatment area source: water treatment: Ticonderoga mill water treatment requirements include process water, potable water, and boiler feedwater. Emissions associated with process and potable water treatment area source: water treatment are considered negligible. Boiler feedwater treatment area source: water treatment consists of filtration to remove suspended solids and demineralization using ion exchange resins to remove dissolved inorganic solids. The process also provides for deaeration and the addition of conditioning chemicals including O2 scavengers, corrosion inhibitors, and hardness binding polymers. Water treatment area source: wastewater treatment plant at the Ticonderoga mill is referred to as the Ross Farm and is located north of the mill property. The process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration, sludge dewatering, and disposal. Process wastewater is collected for treatment from various points in the mill including the power area, pulp mill, paper mill, recausticizing and woodroom. Water treatment area source: wastewater treatment plant effluent is discharged to Lake Champlain.

Emission unit 0WWTRT is associated with the following emission points (EP):

00031, 00035, 00046

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

Process: 122 is located at Building 35 - The wastewater treatment process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration and sludge dewatering and disposal.

Emission unit 0PAPER - Paper mill: the paper mill converts pulp to various finished paper products via the nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Emission unit 0PAPER is associated with the following emission points (EP):

00041, 00047, 00048, 00049, 00050, 00051, 00052, 00053, 00054, 00055, 00056, 00057, 00058, 00059, 00060, 00061, 00062, 00063, 00064, 00065, 00066, 00067

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

Process: 119 is located at Building 4 - The paper mill converts pulp to various finished products via nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Title V/Major Source Status

INTERNATIONAL PAPER TICONDEROGA MILL is subject to Title V requirements. This determination is based on the following information:

This facility is a major source of emissions of sulfur dioxide, nitrogen oxides, carbon monoxide,

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particulates, volatile organic compounds (VOCs) and hazardous air pollutants (HAPs).

Program Applicability

The following chart summarizes the applicability of INTERNATIONAL PAPER TICONDEROGA MILL with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
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.

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

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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

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

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services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2611	PULP MILLS
2621	PAPER MILLS EXC BUILDING PAPER

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
1-02-007-99	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - PROCESS GAS Other: Specify in Comments
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
1-02-009-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Bark-Fired Boiler (> 50,000 LB Steam)
1-02-009-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Wood/Bark-Fired Boiler (> 50,000 LB STM)
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS Other Not Classified
3-07-008-21	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIP STORAGE PILES
3-07-008-22	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIP TRANSFER/CONVEYING
3-07-001-21	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING: WASTEWATER-GENERAL
3-07-001-22	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:CAUSTIZING:GENERAL
3-07-001-15	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:CHLORINE DIOXIDE
3-07-001-06	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Lime Kiln
3-07-001-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Other Not Classified
3-07-001-10	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Recovery Furnace/Indirect Contact Evaporator

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3-07-001-05 PULP & PAPER AND WOOD PRODUCTS
 PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING
 Smelt Dissolving Tank

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
000079-34-5	1, 1, 2, 2-TETRACHLOROETHANE (HAP)	> 0 but < 10 tpy
000120-82-1	1, 2, 4 - TRICHLOROBENZENE (HAP)	> 0 but < 10 tpy
000107-21-1	1, 2-ETHANEDIOL (HAP)	> 0 but < 10 tpy
000108-38-3	1, 3 DIMETHYL BENZENE (HAP)	>= 10 tpy
000098-86-2	1-PHENYLETHANONE (HAP)	> 0 but < 10 tpy
001746-01-6	2, 3, 7, 8-TETRACHLORODIBENZO-P-D IOXIN (HAP)	> 0 but < 10 tpy
000095-48-7	2-METHYL-PHENOL (HAP)	>= 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL (HAP)	> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE (HAP)	>= 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0 but < 10 tpy
007440-36-0	ANTIMONY (HAP)	> 0 but < 10 tpy
007440-38-2	ARSENIC (HAP)	> 0 but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0 but < 10 tpy
000095-47-6	BENZENE, 1, 2-DIMETHYL (HAP)	>= 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0 but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0 but < 10 tpy
000075-15-0	CARBON DISULFIDE (HAP)	> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 250 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)	>= 10 tpy
000463-58-1	CARBONYL SULFIDE (HAP)	> 0 but < 10 tpy
007782-50-5	CHLORINE (HAP)	> 0 but < 10 tpy
010049-04-4	CHLORINE DIOXIDE	> 0 but < 2.5 tpy
000108-90-7	CHLOROBENZENE (HAP)	> 0 but < 10 tpy

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000067-66-3	CHLOROFORM (HAP)	> 0 but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0 but < 10 tpy
062207-76-5	COBALT, ((2,2'- (1,2-ETHA NEDIYLBIS (NITRILOMETHY...	> 0 but < 2.5 tpy
000075-09-2	DICHLOROMETHANE (HAP)	> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO (HAP)	> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO (HAP)	> 0 but < 10 tpy
000111-42-2	ETHANOL, 2,2'-IMINOBIIS- (HAP)	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	>= 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0 but < 10 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
007783-06-4	HYDROGEN SULFIDE	> 0 but < 2.5 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
000074-93-1	METHANETHIOL	>= 2.5 tpy but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10 tpy
000078-93-3	METHYL ETHYL KETONE (HAP)	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy
000127-18-4	PERCHLOROETHYLENE (HAP)	> 0 but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0 but < 10 tpy
000108-39-4	PHENOL, 3-METHYL (HAP)	>= 10 tpy
000106-44-5	PHENOL, 4-METHYL (HAP)	>= 10 tpy
0NY075-00-5	PM-10	>= 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)	> 0 but < 10 tpy
000107-13-1	PROPENENITRILE (HAP)	> 0 but < 10 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
000100-42-5	STYRENE (HAP)	>= 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
000108-88-3	TOLUENE (HAP)	>= 10 tpy
0NY500-00-0	TOTAL REDUCED SULFUR	>= 50 tpy but < 100 tpy
000079-01-6	TRICHLOROETHYLENE (HAP)	>= 10 tpy
0NY075-10-0	UNSPECIATED PARTICULATES (EMISSION STATEMENT USE ONLY)	>= 250 tpy
000075-01-4	VINYL CHLORIDE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy
000106-42-3	XYLENE, PARA- (HAP)	>= 10 tpy
007440-66-6	ZINC	>= 2.5 tpy 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:

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

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

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

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

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

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

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

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

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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 - 6 NYCRR 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

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includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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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.

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 -

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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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
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FACILITY	40CFR 63-MM	Pulp & Paper Chemical Recovery Combustion MACT	3-8
R-CAUST/00005	40CFR 63-MM.862 (a) (ii)	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills	3-24
R-ECOV/-/103/10001	40CFR 63-MM.862 (a) (ii)	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills	3-27
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B-PLANT	40CFR 63-S.450 (d)	Pulp & Paper - Enclosures & Closed-vent System Standards	4-1
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FACILITY	40CFR 68	Chemical accident prevention provisions	3-10
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	5-15
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P-OWERH/-/TDF	6NYCRR 200.6	Acceptable ambient air quality.	5-16, 5-17, 5-18, 5-19, 5-20, 5-21
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		collected contaminants to the air	
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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.

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;

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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.

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

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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

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.

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Facility Specific Requirements

In addition to Title V, INTERNATIONAL PAPER TICONDEROGA MILL has been determined to be subject to the following regulations:

40CFR 52-A.21 (k)

(k) Source impact analysis. The owner or operator of the proposed source or modification shall demonstrate that allowable emission increases from the proposed source or modification, in conjunction with all other applicable emissions increases or reductions (including secondary emissions), would not cause or contribute to air pollution in violation of:

40CFR 60-Kb.116b

This describes monitoring and record keeping requirements for volatile organic liquid storage vessels. This facility's vessels are small enough that only minimal record keeping is required.

40CFR 63-A.10

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-MM

This regulation limits particulate emissions from chemical recovery combustion sources at pulp mills.

40CFR 63-MM.862 (a) (ii)

This regulation requires the owner or operator of a kraft or soda pulp mill to establish limits for the emissions of particulate matter.

40CFR 63-MM.864 (d)

This regulation requires the owner or operator of each affected kraft or soda recovery furnace or lime kiln equipped with an electric static precipitator to install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS).

40CFR 63-MM.864 (e) (10)

This regulation requires the owner or operator of each affected kraft or soda recovery furnace, kraft or soda lime kiln, sulfite combustion unit, or kraft or soda smelt dissolving tank equipped with a wet scrubber must install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the pressure drop across the scrubber.

40CFR 63-MM.864 (k)

This regulation requires the owners or operators of all affected sources or process units to implement

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corrective action, as specified in the startup, shutdown, and malfunction plan if the monitoring system detects exceedances of the standards.

40CFR 63-S.443 (d)

Hazardous Air Pollutant (HAP) emissions from designated pulp making sources must be controlled. They may be burned in a boiler, lime kiln, recovery furnace or thermal oxidizer or controlled by some other device which either achieves 98% reduction of the HAP emissions or reduces the total HAP emissions to 20 parts per million or less.

40CFR 63-S.445 (b)

Emissions from pulp bleaching systems sources where chlorine or chlorinated compounds are introduced must be collected and properly transported to an appropriate control device.

40CFR 63-S.445 (c) (2)

Achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP;

40CFR 63-S.446 (c) (3)

Condensates containing Hazardous Air Pollutants (HAPs) must be collected from designated pulping sources and treated. Under this control option, mills that bleach pulp must treat at least 11.1 pounds of HAP per ton of pulp produced. Mills that do not bleach pulp must treat at least 7.2 pounds per ton.

40CFR 63-S.450 (d)

Emissions from designated pulping and bleaching sources must be collected and transported to an appropriate control device. The transport system shall be designed in such a way that any bypass lines that could divert gasses to the atmosphere must either be closed and sealed or controlled by computer that monitors status every 15 seconds.

40CFR 63-S.454 (b)

For each applicable enclosure opening, closed-vent system and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of the applicable affected equipment.

6NYCRR 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 (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 204-2.1

This condition states the submission requirements for the NOx Budget Trading Program. The Program is designed to mitigate the interstate transport of ground level ozone and nitrogen oxides, a ground level

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ozone precursor.

6NYCRR 204-4.1

This condition covers the compliance certification report requirements for the NOx Budget Program.

6NYCRR 204-7.1

This condition lists the requirements for transfer of allowances in the NOx Budget Program.

6NYCRR 204-8.1

This condition lists the general requirements for the NOx Budget trading program. They include, but are not limited to monitoring requirements, certification, record keeping and reporting.

6NYCRR 204-8.2

This condition covers the procedures for initially certifying and recertifying the monitoring systems of the unit meet the requirements of the NOx Budget Program

6NYCRR 204-8.3

This condition states the requirements for data substitution during times when the monitoring systems do not meet applicable quality assurance requirements.

6NYCRR 204-8.4

This condition lists the addresses where monitoring plans and their modifications, compliance certifications, recertifications, quarterly QA/QC reports and petitions for alternative monitoring shall be sent.

6NYCRR 204-8.7

This condition is a requirement for monitoring and reporting if a particular monitoring scenario is utilized.

6NYCRR 212 .10

This requires major sources of VOCs and NOx to employ Reasonably Available Control Technology (RACT) to control those emissions.

6NYCRR 212 .11 (b) (5)

This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources using continuous monitors.

6NYCRR 212 .3

This citation was used to establish permit limits for emissions of total reduced sulfur (TRS) based on limits established under a consent order signed in 1974.

6NYCRR 212 .3 (a)

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

6NYCRR 212 .3 (b)

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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

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 .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 (d)

The sulfur-in-fuel limitations for residual and distillate oil and for solid fuel are listed in Tables 1,2 and 3 or 6 NYCRR Part 225-1.2(c), (d) and (e)

6NYCRR 225-1.7 (c)

This regulation requires requires that measurements be made daily of the rate of each fuel burned, the gross heat content and ash content of each fuel burned (determined at least once per week), and the average electrical output (daily) and hourly generation rate.

6NYCRR 225-1.7 (e)

This regulation requires source owners subject to 6 NYCRR Part 225-1 to submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, or of measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such excesses if known, for the calendar quarter

6NYCRR 225-2.3 (b) (1)

This regulation requires that each piece of equipment which fires Waste Fuel A demonstrate, at a minimum, 99% combustion efficiency in burning Waste fuel A

6NYCRR 225-2.7

This rule requires that procedures be established to ensure that waste oil meets established criteria and identifies recordkeeping requirements.

6NYCRR 227-1.2

This establishes combustion source particulate emission limits for a variety of different fuels.

6NYCRR 227-1.2 (a) (3)

This paragraph only applies to facilities with heat inputs greater than 250 mmBtu/hr which submitted an application for a permit to construct after August 11, 1972.

6NYCRR 227-2.4 (a)

This condition lists the emission limitations for very large boilers.



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6NYCRR 227-2.4 (a) (2)

This condition lists the emission limitations for very large boilers.

6NYCRR 237-1.4 (c) (1)

This exempts the facility from the requirements of Part 237 as long as the electricity sold to the grid is less than 10% of the gross electricity produced.

Non Applicability Analysis

List of non-applicable rules and regulations:

Location Facility/EU/EP/Process/ES	Short Description	Regulation
R-ECOVB Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input to the boiler.	Emission and fuel monitoring.	6NYCRR 225-1.7
R-ECOVB Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input of the boiler.	Stationary Combustion Installations	6NYCRR 227-1

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.5(g). This information is optional and provided only if the applicant is seeking to obtain formal confirmation, within an issued Title V permit, that specified activities are not subject to the listed federal applicable or state only requirement. The applicant is seeking to obtain verification that a requirement does not apply for the stated reason(s) and the Department has agreed to include the non-applicability determination in the issued Title V permit which in turn provides a shield against any potential enforcement action.

Compliance Certification

Summary of monitoring activities at INTERNATIONAL PAPER TICONDEROGA MILL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
P-OWERH/00044	continuous emission monitoring (cem)	3-17
P-OWERH/00044	continuous emission monitoring (cem)	3-18
P-OWERH/00044	intermittent emission testing	58
R-CAUST FACILITY	record keeping/maintenance procedures	66
R-CAUST FACILITY	record keeping/maintenance procedures	3-6
R-CAUST/00005	record keeping/maintenance procedures	3-8
R-CAUST/00005	intermittent emission testing	3-24
R-ECOVB/-/103/10001	intermittent emission testing	3-27
R-ECOVB/-/105/10003	intermittent emission testing	3-31
R-ECOVB/-/103/10001	record keeping/maintenance procedures	3-28
R-ECOVB/-/103/10001	record keeping/maintenance procedures	3-9
R-CAUST/-/115/10077	monitoring of process or control device parameters as surrogate	3-22
R-CAUST/-/115/10077	monitoring of process or control device parameters as surrogate	3-23
R-ECOVB/-/103/10001	continuous emission monitoring (cem)	3-29
R-ECOVB/-/103/10001	continuous emission monitoring (cem)	3-30



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R-ECOVB/-/105/10102	monitoring of process or control device parameters as surrogate	4-4
R-ECOVB/-/105/10102	monitoring of process or control device parameters as surrogate	4-5
P-OWERH/-/111/10044	monitoring of process or control device parameters as surrogate	1-4
P-ULPIN	monitoring of process or control device parameters as surrogate	62
B-PLANT	intermittent emission testing	45
P-ULPIN	monitoring of process or control device parameters as surrogate	2-18
B-PLANT	monitoring of process or control device parameters as surrogate	4-1
P-ULPIN	monitoring of process or control device parameters as surrogate	3-19
FACILITY	record keeping/maintenance procedures	3-7
P-OWERH/-/TDF	continuous emission monitoring (cem)	5-16
P-OWERH/-/TDF	work practice involving specific operations	5-17
P-OWERH/-/TDF	monitoring of process or control device parameters as surrogate	5-18
P-OWERH/-/TDF	continuous emission monitoring (cem)	5-19
P-OWERH/-/TDF	record keeping/maintenance procedures	5-20
P-OWERH/-/TDF	work practice involving specific operations	5-21
FACILITY	record keeping/maintenance procedures	3-1
FACILITY	record keeping/maintenance procedures	3-2
FACILITY	record keeping/maintenance procedures	3-3
FACILITY	record keeping/maintenance procedures	29
P-OWERH	record keeping/maintenance procedures	2-16
P-OWERH	record keeping/maintenance procedures	2-17
R-CAUST/-/115	intermittent emission testing	2-20
R-ECOVB/00001/103/10001	intermittent emission testing	77
B-PLANT/00004/116	monitoring of process or control device parameters as surrogate	2-6
B-PLANT/00004/116	monitoring of process or control device parameters as surrogate	2-7
R-CAUST/-/115/10077	monitoring of process or control device parameters as surrogate	1-7
R-CAUST/-/115	continuous emission monitoring (cem)	3-20
R-CAUST/-/115	intermittent emission testing	68
R-ECOVB	continuous emission monitoring (cem)	4-3
R-ECOVB	continuous emission monitoring (cem)	3-26
R-ECOVB/00003	intermittent emission testing	79
R-ECOVB/00001/103/10001	intermittent emission testing	75
R-ECOVB/00001/103/10001	work practice involving specific operations	76
R-ECOVB/00001/104/10001	work practice involving specific operations	78
FACILITY	monitoring of process or control device parameters as surrogate	1-1
FACILITY	work practice involving specific operations	33
P-OWERH	record keeping/maintenance procedures	49
P-OWERH	record keeping/maintenance procedures	50
P-OWERH	monitoring of process or control device parameters as surrogate	3-12
R-CAUST/-/115/10005	monitoring of process or control device parameters as surrogate	3-21
FACILITY	record keeping/maintenance procedures	34
P-OWERH	monitoring of process or control device parameters as surrogate	3-13
P-OWERH	intermittent emission testing	3-14

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P-OWERH/-/TDF	intermittent emission testing	5-22
P-OWERH	continuous emission monitoring (cem)	4-2
P-OWERH/00044	continuous emission monitoring (cem)	3-16
P-OWERH	record keeping/maintenance procedures	3-34

Basis for Monitoring

This modification is to allow the facility to test burn tire-derived fuel (TDF) in its power boiler. After a week of operating the boiler with increasing amounts of TDF, there will be extensive stack testing with TDF followed by baseline testing (without TDF) at as near identical conditions as is practical. The results of the testing will determine whether TDF can be burned on a regular basis in the future.

The boiler will be closely monitored while TDF is being burned and if there are indications that the boiler combustion or the scrubber controlling emissions are not working properly, the TDF feed will stop. These indications include sulfur dioxide emission rate (scrubber effectiveness), nitrogen oxide emission rate (combustion effectiveness) and opacity (combustion effectiveness and scrubber effectiveness). In addition, particulate emission rate will be measured during the pre-test period to ensure that the allowable emission rate is not exceeded.