New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-1548-00008/00081
Renewal Number: 2
Modification Number: 4 01/20/2015

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

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

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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
Convert the power boiler and lime kiln to natural gas as the primary fuel.

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*	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 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 pa per 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, packa ged 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 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 is permitted to fire natural gas, #2 fuel oil, # 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-condensible gases (NCGs), which are produced in the pulping and chemical recovery processes, through thermal oxidation. 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
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 450 wet tons per day.

Process: 108 is located at Building 29 - The power boiler firing dewatered secondary biosolids produced in the on-site wastewater treatment plant. 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 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 with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered primary clarifier fiber fed to the boiler shall not exceed 40 cubic yards per day.

Process: 111 is located at Building 29 - Non-condensible 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 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: 125 Firing natural gas in the power boiler.

Process: 126 Firing #2 fuel oil in the power boiler.

Emission unit RCAUST - Recausticizing area source: the Ticonderoga Mill recausticizing 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. The lime kiln burns natural gas, #2 fuel oil or #6 fuel oil and uses propane or natural gas as a fuel for startup and process stabilization. Equipment in the recausticizing area includes a lime kiln, one green liquor clarifier, two green liquor storage tanks, one lime slaker, three causticizers, one white liquor clarifier, two white liquor storage tanks, one white liquor receiver tank, one sewer clarifier, one mud washer tank, one weak wash storage tank, lime mud mix tank, lime mud storage tank, mud filter hood vent, and vacuum pumps for the dregs filters and lime mud filter.

Emission unit RCAUST is associated with the following emission points (EP):
00005, 00006, 00008, 00018, 00019, 00020, 00043, 00108, 00109, 00110, 00111, 00112, 00113, 00114, 00115, 00117, 00119, 00121, 00123, 00124, 00126
Process: 114 is located at Building 19 - The recausticizing 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". The lime kiln burns natural gas, #2 fuel oil and/or #6 fuel oil. Propane or natural gas are used for startup and process stabilization.

Emission unit RECOVB - The recovery furnace emission unit consists of a kraft recovery furnace and a smelt dissolving tank. The recovery furnace fires black liquor and #6 or #2 fuel oil to produce steam for manufacturing operations and smelt. Smelt (sulfur and sodium chemicals recycled in the draft process) 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
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 #6 fuel oil.

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

Process: 127 Babcock and Wilcox recovery furnace fired on #2 fuel oil.

Emission unit 0WWTRT - The Ticonderoga Mill wastewater treatment plant provides neutralization, primary clarification, secondary biological treatment with aeration, wetlands treatment, secondary clarification, tertiary clarification, primary sludge dewatering and secondary sludge dewatering. Sources of wastewater include wood handling, pulp production, paper manufacturing, water treatment plant

solids, boiler water treatment, electrical power generation, landfill leachate, sanitary wastewater and stormwater. Wastewater is conveyed to the various sections of the wastewater treatment plant through a network of underground pipelines.

Emission unit 0WWTRT is associated with the following emission points (EP):
00031, 00035, 00046
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 BPLANT - Bleach plant area source: The bleach plant whitens pulp for paper production. Equipment venting to the bleach plant scrubber includes the #10 tower (first bleaching stage), #15 seal pit and washer hood, #25 seal pit and washer hood, #35 seal pit and washer hood, #45 seal pit and washer hood, #55 seal pit and washer hood, #30 tower (third bleaching stage), #50 tower (fifth bleaching stage), the chlorine dioxide absorber, the pulp mill acid sewer, the emergency pressure relief hatches from two chlorine dioxide generators, the vents from two chlorine dioxide storage tanks, the spent acid surge tank and a vent from a pulp mill chemical lab hood.. 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 bleach pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission unit BPLANT is associated with the following emission points (EP):
00004, 00078, 00079, 00080, 00081, 00082, 00083
Process: 116 is located at Building 6 - The bleach plant whitens brown pulp for 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 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 5 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
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 54 - Chips pneumatically blown to woodroom through two cyclones.

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
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.

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 chemical recovery in the recovery furnace. 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. The digestor system includes a continuous digester, two flash tanks, 4 flash steam condensers, two blow tanks, a chip bin feeder, a low pressure feeder, and a digester acid wash tank. Non-condensible gases (NCGs) are collected from all components of the digester system, except the low pressure feeder, for thermal oxidation in the power boiler. The low pressure feeder vents to the atmosphere only during digester start-up and shut-down. The evaporator system includes a six-effect evaporator, two concentrators, 2 surface condensers, a hogging ejector for the surface condensers, an air ejector, and evaporator seal tank, and a stripper feed jug. NCGs are collected from all components except the hogging ejector which is used only during evaporator start-up. The powerhouse black liquor spill tank collects liquor from process upsets, such as evaporator upsets, for use after the process stabilizes. This tank is vented to the HVLC system as part of the NESHAP. The knotter system includes two pressure primary knotters and two secondary knotters. NCGs from the system are collected for thermal oxidation at the secondary knotters. Knots leaving the knotter system are either conveyed pneumatically to the top of the digester for fiber recovery, through a cyclone, or ejected from the pulp mill for disposal or energy recovery. The pulp washing system includes a pressure diffuser, a black liquor dump tank, a black liquor holding tank, a diffuser filtrate tank, two vacuum drum brown stock washers, two washer seal tanks and a washed stock storage tank. NCGs are collected from all components except the washed stock storage tank. The primary rejects tank and the secondary rejects tank vent to the washed stock storage tank. Both of these tanks are part of the screen system. The decker system includes two vacuum deckers, a decker white water tank, a decker low density storage tank and a fiber salvage tank. The deckers and the decker low density storage tank are vented to a separate stack. The decker white water tank vents directly to the atmosphere from the tank. This emission unit also includes an unbleached hardwood pulp high density storage tank and an unbleached softwood high density storage tank. Both tanks vent to the atmosphere. The NCG collection system also collects NCGs from various weak and strong black liquor tanks that include two weak liquor tanks, two 50% liquor tanks, sour condensate tank, 2 strong liquor tanks, 2 black liquor soap storage tanks, the evaporater seal tanks, 3 precipitator mix tanks, an economizer liquor mix tank, and a salt cake mix tank. The non-condensible gas system delivers NCGs to the power boiler for thermal treatment.

Emission unit PULPIN is associated with the following emission points (EP):
00084, 00085, 00086, 00088, 00089, 00090, 00091, 00100, 00105, 00106, 00107
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 chemical recovery in the recovery furnace. Processes in this emission unti 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-condensible gases to the atmosphere from the non-condensible gas collection system.

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

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	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.

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.

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
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
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
1-02-005-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL Grades 1 and 2 Oil
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-007-99	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - PROCESS GAS Other: Specify in Comments
1-02-009-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Wood/Bark-Fired Boiler (> 50,000 LB STM)
3-07-001-05	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Smelt Dissolving Tank
3-07-001-06	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Lime Kiln
3-07-001-10	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING Recovery Furnace/Indirect Contact Evaporator
3-07-001-15	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:CHLORINE DIOXIDE
3-07-001-21	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
3-07-001-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING 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
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS Other Not Classified

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service 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 lbs/yr	PTE Range
000092-52-4	1, 1 BIPHENYL		> 0 but < 10 tpy
000120-82-1	1,2,4-TRICHLOROBENZENE		> 0 but < 10 tpy
000107-06-2	1,2-DICHLOROETHANE		> 0 but < 10 tpy
000106-99-0	1,3-BUTADIENE		> 0 but < 10 tpy
000098-86-2	1-PHENYLETHANONE		> 0 but < 10 tpy
001746-01-6	2,3,7,8-TETRACHLORODIBENZO-P-DIOXIN		> 0 but < 10 tpy
000121-14-2	2,4, DINITRO TOLUENE		> 0 but < 10 tpy
000051-28-5	2,4, DINITROPHENOL		> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL		> 0 but < 10 tpy
000108-10-1	2-PENTANONE, 4-METHYL		> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE		>= 10 tpy
000107-02-8	ACROLEIN		> 0 but < 10 tpy
007440-36-0	ANTIMONY		> 0 but < 10 tpy
007440-38-2	ARSENIC		> 0 but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000098-82-8	BENZENE, (1-METHYLETHYL)		> 0 but < 10 tpy
007440-41-7	BERYLLIUM		> 0 but < 10 tpy
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE		> 0 but < 10 tpy
007440-43-9	CADMIUM		> 0 but < 10 tpy
000075-15-0	CARBON DISULFIDE		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 250 tpy but <

		75,000 tpy
000056-23-5	CARBON TETRACHLORIDE	>= 10 tpy
000463-58-1	CARBONYL SULFIDE	> 0 but < 10 tpy
007782-50-5	CHLORINE	> 0 but < 10 tpy
010049-04-4	CHLORINE DIOXIDE	> 0 but < 2.5 tpy
000108-90-7	CHLOROBENZENE	> 0 but < 10 tpy
000067-66-3	CHLOROFORM	> 0 but < 10 tpy
007440-47-3	CHROMIUM	> 0 but < 10 tpy
007440-48-4	COBALT	> 0 but < 10 tpy
001319-77-3	CRESYLIC ACID	> 0 but < 10 tpy
000075-09-2	DICHLOROMETHANE	> 0 but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO	> 0 but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO	> 0 but < 10 tpy
000067-72-1	ETHANE, HEXACHLORO	> 0 but < 10 tpy
000100-41-4	ETHYLBENZENE	>= 10 tpy
000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
000118-74-1	HEXACHLOROBENZENE	> 0 but < 10 tpy
000110-54-3	HEXANE	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0 but < 10 tpy
007664-39-3	HYDROGEN FLUORIDE	> 0 but < 10 tpy
007783-06-4	HYDROGEN SULFIDE	> 0 but < 2.5 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
007439-97-6	MERCURY	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL	>= 10 tpy
000074-83-9	METHYL BROMIDE	> 0 but < 10 tpy
000074-87-3	METHYL CHLORIDE	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy but < 75,000 tpy
000100-02-7	PARA-NITROPHENOL	> 0 but < 10 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 tpy
000108-95-2	PHENOL	> 0 but < 10 tpy
000534-52-1	PHENOL, 2-METHYL-4,6-DINITRO	> 0 but < 10 tpy
000087-86-5	PHENOL, PENTACHLORO	> 0 but < 10 tpy
007723-14-0	PHOSPHORUS (YELLOW)	> 0 but < 10 tpy
0NY075-02-5	PM 2.5	>= 250 tpy but < 75,000 tpy
0NY075-00-5	PM-10	>= 250 tpy but < 75,000 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS	> 0 but < 10 tpy
000078-87-5	PROPANE, 1,2-DICHLORO	> 0 but < 10 tpy
000107-13-1	PROPENENITRILE	> 0 but < 10 tpy
000123-38-6	PROPIONALDEHYDE	> 0 but < 10 tpy
000129-00-0	PYRENE	> 0 but < 10 tpy
007782-49-2	SELENIUM	> 0 but < 10 tpy
000100-42-5	STYRENE	> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY100-00-0	TOTAL HAP	>= 100 tpy but < 250 tpy
0NY500-00-0	TOTAL REDUCED SULFUR	>= 50 tpy but < 100 tpy
000079-01-6	TRICHLOROETHYLENE	> 0 but < 10 tpy
0NY075-10-0	UNSPECIATED	>= 250 tpy but <

	PARTICULATES (EMISSION STATEMENT USE ONLY)	75,000 tpy
000075-01-4	VINYL CHLORIDE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.	>= 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 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 6 NYCRR 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 201-6.2(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 201-6.2(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 201-6.4(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 201-6.4(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 201-6.4(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 201-6.4(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.4(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 201-6.4(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising

or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;

ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;

iii. The applicable requirements of Title IV of the 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 201-6.4(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 2 01-6.7 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.

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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	88	Powers and Duties of the Department with respect to air pollution control
P-OWERH/00044	40CFR 52-A.21(k)	63, 64, 65	Source Impact Analysis
FACILITY	40CFR 63-A.10	38, 39, 40, 3 -13	Recordkeeping and Reporting
FACILITY	40CFR 63-A.8(d)(2)	37	
P-OWERH	40CFR 63-DDDDD	4 -2	Boilers and Process

			Heaters Major Source NESHAP rule
FACILITY	40CFR 63-MM	45	Pulp & Paper Chemical Recovery Combustion MACT
R-CAUST/00005	40CFR 63-MM.862(a)(ii)	75	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/103/10001	40CFR 63-MM.862(a)(ii)	78, 2 -1	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/105/10003	40CFR 63-MM.862(a)(ii)	83	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/103/10001	40CFR 63-MM.864(d)	79	Monitoring requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-CAUST/-/115/10077	40CFR 63-MM.864(k)	73, 74	Monitoring Requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/103/10001	40CFR 63-MM.864(k)	80, 81	Monitoring Requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/105/10102	40CFR 63-MM.864(k)	84, 85	Monitoring Requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
R-ECOVB/-/103/10001	40CFR 63-MM.867(b)(3)	82	NESHAP for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand alone Semi chemical Pulp Mills
FACILITY	40CFR 63-S	3 -14	Pulp and Paper I & III
P-ULPIN	40CFR 63-S.443(d)	3 -21	Pulp and Paper - Kraft, Soda & Semi-Chem. Standards
P-OWERH/-/111	40CFR 63-S.443(d)(4)	61	Pulp and Paper - Kraft, Soda & Semi-Chem. Standards

B-PLANT	40CFR 63-S.445(b)	48	Pulp & Paper - Bleaching System Standards
B-PLANT	40CFR 63-S.445(c)(2)	3 -15	Pulp & Paper - Bleaching System Standards
P-ULPIN	40CFR 63-S.446(e)(1)	3 -22	Pulp & Paper - Kraft Pulping Process Condensates Standards
B-PLANT	40CFR 63-S.450(d)	50	Pulp & Paper - Enclosures & Closed-vent System Standards
P-ULPIN	40CFR 63-S.450(d)	68	Pulp & Paper - Enclosures & Closed-vent System Standards
B-PLANT/-/116/10094	40CFR 63-S.453(c)	3 -16, 3 -17, 3 - 18	Pulp & Paper - Monitoring Requirements (Scrubber)
FACILITY	40CFR 63-S.454(b)	43, 44	Pulp & Paper - Recordkeeping Requirements
FACILITY	40CFR 68	20	Chemical accident prevention provisions
FACILITY	40CFR 82-F	21	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
P-OWERH	6NYCRR 200.6	54	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	3 -23	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	3 -6	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	3 -7	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	3 -8	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	22, 46, 47	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	3 -9	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	3 -1	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	3 -10	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3 -2	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4(c)(2)	3 -3	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-	3 -4	Reporting

	6.4(c)(3)(ii		Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	3 -12	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	3 -5	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	3 -11	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	23	Permit shield
FACILITY	6NYCRR 202-1.1	19	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	24	General Prohibitions - air pollution prohibited
R-CAUST/-/115	6NYCRR 212.10	70	NOx and VOC RACT required at major facilities
R-CAUST/-/115/10005	6NYCRR 212.10	4 -6	NOx and VOC RACT required at major facilities
R-ECOVB/00001/103/10001	6NYCRR 212.10	86	NOx and VOC RACT required at major facilities
R-CAUST/-/115/10077	6NYCRR 212.11(b)(5)	72	Sampling and monitoring
R-CAUST/-/115	6NYCRR 212.3	69	Emissions from existing emission sources
R-ECOVB	6NYCRR 212.3	76, 77	Emissions from existing emission sources
FACILITY	6NYCRR 212.3(a)	90	General Process Emission Sources - emissions from existing emission sources
R-ECOVB	6NYCRR 212.4	4 -7	General Process Emission Sources - emissions from new sources and/or modifications
FACILITY	6NYCRR 212.6(a)	25	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
P-OWERH/-/106	6NYCRR 225-1.4(a)	4 -3	Fuel Mixtures or Equivalent Emission Rate Variances
P-OWERH/-/126	6NYCRR 225-1.4(a)	4 -5	Fuel Mixtures or Equivalent Emission Rate Variances
P-OWERH	6NYCRR 225-1.5(c)	4 -8	Monitoring Requirements
P-OWERH	6NYCRR 225-1.6(a)	4 -1	Required Fuel Analysis
P-OWERH	6NYCRR 225-2.3(b)(1)	57	Eligibility to burn waste fuel A.

R-CAUST/-/115/10005	6NYCRR 225-2.3(b)(1)	71	Eligibility to burn waste fuel A.
FACILITY	6NYCRR 225-2.7	27	Reports, sampling and analysis of waste fuels A and B.
P-OWERH	6NYCRR 227-1.2	58	Particulate Emissions from Liquid Fuels.
P-OWERH	6NYCRR 227-1.2(a)(3)	59	Particulate Emissions Firing Solid Fuel. (see narrative)
P-OWERH/00044	6NYCRR 227-1.3(a)	62	Smoke Emission Limitations.
P-OWERH/-/125/10044	6NYCRR 227-2.4(a)	4 -4	Very large boilers.
P-OWERH/00044	6NYCRR 227-2.4(a)(1)	92, 3 -20	Emission limits.
P-OWERH	6NYCRR 227-2.5(c)	3 -19	Alternative RACT option.
FACILITY	6NYCRR 249.3(f)	36	Each BART determination established by the Department will be submitted to the EPA for approval as a SIP revision.

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

ECL 19-0301
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.

6 NYCRR 200.6
Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 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

6 NYCRR 201-1.4
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.

6 NYCRR 201-1.7
Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8
Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR Subpart 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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 201-6.4 (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.

6 NYCRR 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.

6 NYCRR 202-2.1
Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENDar year.

6 NYCRR 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.

6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

40 CFR Part 68
This Part lists the regulated substances and there 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, INTERNATIONAL PAPER TICONDEROGA MILL has been determined to be subject to the following regulations:

40 CFR 52.21 (k)

(k) Source impact analysis. The owner or operator of the proposed source or modification shall demonstrate that allowable emission increases from the source, in conjunction with all other applicable emissions increases or reductions (including secondary emissions), would not cause or contribute to air pollution in violation of ambient air quality standards. To ensure that such violation does not occur, control requirements for particulate and sulfur dioxide emissions from the power boiler are established.

40 CFR 63.10

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.

40 CFR 63.443 (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.

40 CFR 63.443 (d) (4)

Reduce total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone.

40 CFR 63.445 (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.

40 CFR 63.445 (c) (2)

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

40 CFR 63.446 (e) (1)

40 CFR 63.450 (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.

40 CFR 63.453 (c)

40 CFR 63.454 (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 ot the components of the applicable affected equipment.

40 CFR 63.8 (d) (2)

40 CFR 63.862 (a) (ii)
This regulation limits emissions of particulate matter from recovery combustion sources at kraft pulp mills.

40 CFR 63.864 (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 contianuous opacity monitoring system (COMS).

40 CFR 63.864 (k)
This regulation requires the owners or operators of all affected sources or process units to implement corrective action, as specified in the startup, shutdown, and malfunction plan if the monitoring system detects exceedances of the standards.

40 CFR 63.867 (b) (3)
This regulation sets forth the reporting requirements for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

40 CFR Part 63, Subpart DDDDD
This subpart establishes national emission limits and work practice standards for hazardous air pollutants (HAP) emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP emissions. It also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

40 CFR Part 63, Subpart MM

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

40 CFR Part 63, Subpart S

6 NYCRR 211.1
This regulation prohibits emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property.

6 NYCRR 212.10
This section describes the Reasonably Available Control Technology requirements for emissions of oxides of nitrogen and/or volatile organic compounds from major facilities.

6 NYCRR 212.11 (b) (5)
This section sets the requirements for sampling, monitoring, recordkeeping, and reporting from process sources using continuos monitors.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 212.6 (a)
This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6 NYCRR 225-1.4 (a)
This citation regulates fuel mixtures and equivalent emission rate variances.

6 NYCRR 225-1.5 (c)
This citation sets the daily and weekly fuel monitoring requirements for subject emission sources.

6 NYCRR 225-1.6 (a)
This citation requires a subject facility to analyze their fuel.

6 NYCRR 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

6 NYCRR 225-2.7
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This describes certification requirements concerning the use of waste oil.

6 NYCRR 227-1.2

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

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 227-2.4 (a)
This requires a NOx RACT analysis for very large boilers which burn fuels not listed in 227-2.4(a)(1).

6 NYCRR 227-2.4 (a) (1)
NOx emission limits for very large boilers.

6 NYCRR 227-2.5 (c)
This provision allows the owner or operator to demonstrate that the applicable presumptive RACT emission limit in section 227-2.4 of this Subpart is not economically or technically feasible. Based on this determination the Department is allowed to set a higher emission source specific emission limit.

6 NYCRR 249.3 (f)

This includes BART requirements in the State Implementation Plan (SIP) which makes them Federally enforceable.

Non Applicability Analysis
List of non-applicable rules and regulations:

Location	Regulation	Short Description

Facility/EU/EP/Process/ES

P-ULPIN/-/120	40 CFR 63.443 (a)	Pulp and Paper - Kraft, Soda & Semi-Chem.

Reason: The decker system in not applicable to MACT Subpart S pulping system standards because it uses only fresh water, paper machine white water or process water with a total HAP concentration less than 400 parts per million by weight.

R-ECOVB	6 NYCRR 225-1.7	Emission and fuel monitoring.

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.

R-ECOVB	6 NYCRR Subpart 227-1	Stationary Combustion Installations

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.

NOTE: Non-applicability determinations are cited as a permit condition under 6 NYCRR Part 201-6.4(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	Cond No.	Type of Monitoring
P-OWERH/00044	63	intermittent emission testing
P-OWERH/00044	64	continuous emission monitoring (cem)
P-OWERH/00044	65	continuous emission monitoring (cem)
FACILITY	3-13	record keeping/maintenance procedures
FACILITY	40	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
P-OWERH	4-2	record keeping/maintenance procedures
FACILITY	45	record keeping/maintenance procedures
R-CAUST/00005	75	intermittent emission testing
R-ECOVB/-/103/10001	2-1	work practice involving specific operations
R-ECOVB/-/103/10001	78	intermittent emission testing

R-ECOVB/-/105/10003	83	intermittent emission testing
R-ECOVB/-/103/10001	79	record keeping/maintenance procedures
R-CAUST/-/115/10077	73	monitoring of process or control device parameters as surrogate
R-CAUST/-/115/10077	74	monitoring of process or control device parameters as surrogate
R-ECOVB/-/103/10001	80	continuous emission monitoring (cem)
R-ECOVB/-/103/10001	81	continuous emission monitoring (cem)
R-ECOVB/-/105/10102	84	monitoring of process or control device parameters as surrogate
R-ECOVB/-/105/10102	85	monitoring of process or control device parameters as surrogate
R-ECOVB/-/103/10001	82	record keeping/maintenance procedures
FACILITY	3-14	record keeping/maintenance procedures
P-ULPIN	3-21	record keeping/maintenance procedures
P-OWERH/-/111	61	record keeping/maintenance procedures
B-PLANT	3-15	intermittent emission testing
P-ULPIN	3-22	monitoring of process or control device parameters as surrogate
B-PLANT	50	monitoring of process or control device parameters as surrogate
P-ULPIN	68	record keeping/maintenance procedures
B-PLANT/-/116/10094	3-16	record keeping/maintenance procedures
B-PLANT/-/116/10094	3-17	monitoring of process or control device parameters as surrogate
B-PLANT/-/116/10094	3-18	monitoring of process or control device parameters as surrogate
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	record keeping/maintenance procedures
P-OWERH	54	record keeping/maintenance procedures
FACILITY	3-4	record keeping/maintenance procedures
FACILITY	3-5	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
R-CAUST/-/115	70	intermittent emission testing
R-CAUST/-/115/10005	4-6	record keeping/maintenance procedures
R-ECOVB/00001/103/10001	86	intermittent emission testing
R-CAUST/-/115/10077	72	monitoring of process or control device parameters as surrogate
R-CAUST/-/115	69	continuous emission monitoring (cem)
R-ECOVB	76	continuous emission monitoring (cem)
R-ECOVB	77	continuous emission monitoring (cem)
R-ECOVB	4-7	work practice involving specific operations
FACILITY	25	monitoring of process or control device parameters as surrogate
P-OWERH/-/106	4-3	continuous emission monitoring (cem)
P-OWERH/-/126	4-5	continuous emission monitoring (cem)
P-OWERH	4-8	record keeping/maintenance procedures
P-OWERH	4-1	record keeping/maintenance procedures
P-OWERH	57	monitoring of process or control device parameters as surrogate
R-CAUST/-/115/10005	71	monitoring of process or control device parameters as surrogate
FACILITY	27	record keeping/maintenance procedures
P-OWERH	58	monitoring of process or control device parameters as surrogate
P-OWERH	59	intermittent emission testing
P-OWERH/00044	62	monitoring of process or control device parameters as surrogate
P-OWERH/-/125/10044	4-4	record keeping/maintenance procedures
P-OWERH/00044	3-20	continuous emission monitoring (cem)
P-OWERH/00044	92	continuous emission monitoring (cem)
P-OWERH	3-19	continuous emission monitoring (cem)
FACILITY	36	record keeping/maintenance procedures

Basis for Monitoring
Bleaching Sources - 40CFR63.445 requires collection and control of exhaust gases from sources where chlorinated compounds are introduced. The facility complies with the option of controlling the pollutant to 10 parts per million or less of chlorinated HAP emissions. The monitoring scheme to ensure compliance includes an initial stack test to demonstrate initial compliance and to establish pH and filtrate flow rate parameters for the scrubber. These parameters are continuously monitored. Once each permit term, a stack test is required to ensure that the scrubber still meets control requirements. A report is submitted semiannually addressing excess emissions and continuous monitoring system performance.

Pulping Sources - 40CFR63.443 requires collection and control of noncondensible gases from specified sources. 40CFR63.446 requires collection and treatment of condensate containing at least 11.1 pounds of methanol per oven dried ton of pulp produced. Gases are treated by burning them in the power boiler. The collection system is monitored continuously with pressure switches to ensure that gases are not inadvertently vented. Condensate is treated by recycling it as shower water in the #2 brown stock washer. Condensate flow is continuously measured to the brown stock washer. A report is submitted semiannually addressing excess emissions and continuous monitoring system performance.

NOx RACT - A study was conducted in 1984 and determined that the lime kiln and recovery boiler, as operated, met RACT requirements and established nitrogen oxides (NOx) emission limits. Once each permit term, a stack test is performed to ensure that the sources are still in compliance with those limits. A new RACT analysis for the lime kiln was prepared in 2006. If the operation of the sources changes, the Department may require additional testing.

Total Reduced Sulfur (TRS) - Consent Order #1743 executed in 1974 established limits of TRS emissions from the recovery boiler and lime kiln. Each source has a TRS continuous emissions monitor to ensure compliance. The lime kiln caustic flow rate to the scrubber is also monitored continuously. An excess emissions report is submitted quarterly.

Power Boiler CEMs - Continuous Emission Monitors for sulfur dioxide (SO2) and nitrogen oxides (NOx) are required to ensure that emissions do not exceed permit limits. SO2 limits were established under 40CFR52.21 to prevent excessive ambient air impacts under the PSD program. NOx limits are established by 6NYCRR 227-2.4. An excess emission report is submitted quarterly. Additional reporting is also required under the NOx Budget Program.

Misc. Particulate Emissions - The power boiler, recovery boiler, lime kiln and smelt dissolving tank are all subject to stack testing for particulates once during each permit term. More frequent testing is not required for a variety of reasons. The power boiler has a scrubber and continuous emission monitors for other sulfur dioxide. As long as this pollutant is controlled, it is reasonable to expect that particulates will be controlled as well. The recovery boiler has a continuous opacity monitor. The smelt dissolving tank and lime kiln have scrubbers with continuous monitoring of pressure drop and filtrate flow.

Opacity - Emissions from miscellaneous papermaking, pulping, recaust area and woodyard sources are checked daily for opacity. These sources typically do not create any opacity so any opacity observed requires immediate corrective action. Emissions from the power boiler are also checked daily. If there is a possible exceedence of the opacity limit, corrective action must be taken immediately.