New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5205-00005/00059
Renewal Number: 1
Modification Number: 1 11/17/2010

Facility Identification Data
Name: FINCH PAPER LLC
Address: 1 GLEN ST
GLENS FALLS, NY 12801

Owner/Firm
Name: FINCH PAPER LLC
Address: 1 GLEN ST
GLENS FALLS, NY 12801, 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

Modification to install continuous monitors for NOx and SO2 in the recovery boiler stack.

Attainment Status
FINCH PAPER LLC is located in the town of GLENS FALLS in the county of WARREN.
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:
The facility produces high-quality paper products. Manufacturing processes include pulp preparation, paper machines, acid recovery, bleaching operations, and wastewater facilities. Facility boilers include five power boilers, four recovery boilers, and a woodwaste boiler.

Permit Structure and Description of Operations
The Title V permit for FINCH PAPER LLC
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.

FINCH PAPER LLC is defined by the following emission unit(s):

Emission unit 100000 - Unit consists of four paper machines and their associated emission points. Sulfite stock is mixed with additives on the wet end and processed through the paper machines to form paper product. Emissions are released through the exhausters, economizers, and hood exhaust fans of the paper machines

Emission unit 100000 is associated with the following emission points (EP):
10009, 10010, 10011, 10012, 10013, 10014, 10017, 10018, 10019, 10020, 10021, 10022, 10023, 10024, 10025, 10034, 10035, 10036, 10037, 10038, 10039, 10040, 10041, 10042, 10043, 10044
Process: 101 is located at BLDGS. PM123,PM4 - Sulfite stock is used by paper machines 1-4 to form paper.

Emission unit 200000 - The unit consists of the facility's pulp prep and precipitated calcium carbonate processes.

Emission unit 200000 is associated with the following emission points (EP):
00014, 00015, 00016, 00020
Process: 201 is located at Building PCC - Slaking of lime. Dry lime (CaO) is mixed with water in a slaker, which consists of two reaction tanks and a finished calcium hydroxide (slaked lime) storage tank. The emissions from the slaker are directed to the demister which in turn exhausts to emission point 00020.

Process: 202 is located at Building PCC - Manufacture of precipitated calcium carbonate (PCC) by combining slaked calcium hydroxide with carbon dioxide which is obtained from power boiler or recovery boiler flue gas in one of three carbonators. Exhaust discharges through carbonator mist eliminators to Emission Points 00014, 00015 and 00016.

Emission unit 300000 - Emission unit 3-00000 consists of facility's power boiler network. Unit contains five power boilers which can burn either natural gas or #6 fuel oil. When burning fuel oil, the power boilers exhaust through a common stack (EP00009). Each of the power boilers has an individual short stack when using natural gas.
Also included are recovery boilers 6 & 7 when they are burning oil and exhausting through EP00009.

Emission unit 300000 is associated with the following emission points (EP):
00009, 0009A, 0009B, 0009C, 0009D, 0009E
Process: 301 is located at Building POWER - Process consists of natural gas combustion for the power boilers.

Process: 302 is located at Building POWER - Process consists of #6 fuel oil combustion for the power boilers.

Process: 311 is located at Building POWER - Combustion of #6 oil in recovery boilers 6 & 7. This may occur when one or more of the power boilers have been taken off-line for maintenance or repair. The exhaust gases are vented through the power boiler stack.

Process: 333 is located at Building POWER - Burning oil in power boiler # 1 to produce exhaust gas for

PCC manufacture.

Emission unit 310000 - Emission unit 3-10000 consists of the facility's woodwaste boiler. Wood waste is combusted with #6 fuel oil or natural gas. A dust collector and venturi scrubber are used to control particulate emissions.

Emission unit 310000 is associated with the following emission points (EP):
00011
Process: 303 is located at Building POWER - Process consists of natural gas combustion for the woodwaste boiler.

Process: 304 is located at Building POWER - Process consists of #6 fuel oil combustion for the woodwaste boiler
Process: 305 is located at Building POWER - Process consists of woodwaste combustion in the woodwaste boiler.

Emission unit 320000 - Emission unit 3-20000 consists of the facility's recovery boiler network. The unit contains four boilers which can burn #6 fuel oil or natural gas in order to combust product liquor. The SO2 from the liquor combustion is collected for use as acid for digestion through ammonia towers. Brinks mist eliminators are used to control particulate emissions.

Emission unit 320000 is associated with the following emission points (EP):
00012, 0012A, 0012B, 0012C, 0012D
Process: 306 is located at Building POWER - Process consists of natural gas combustion for the recovery boilers. With this process, the boilers are exhausted through individual stacks as well as through the main recovery boiler stack.

Process: 308 is located at Building POWER - Process consists of liquor combustion for recovery boilers. It may be in conjunction with oil or natural gas combustion and the exhaust is routed through absorbers and mist eliminators.

Process: 309 is located at Building POWER - Process consists of storage of liquor and acid during the recovery process.

Emission unit 400000 - Emission unit consists of the pulp mill and bleach plant.

Emission unit 400000 is associated with the following emission points (EP):
00006, 00010, 00018, 00019, 00028, 40001, 40007, 40008, 40010, 40011, 40012, 40013, 40014, 40015, 40016, 40017
Process: 401 is located at SULFUR BURNER, Building PULP - Sulfur is burned in either of two sulfur burners to produce SO2 gas. SO2 gas is cooled in a series of two cooling towers, and then through a packed bed absorption tower. SO2 is absorbed with ammonia and used as cooking acid for digester. Tail gas is filtered through a mist eliminator.

Process: 402 is located at DIGESTER, Building PULP - Chips and liquor are charged to digester and are

allowed to cook. Upon completion of the batch, the pulp is discharged to the blow tank, then through the bleach plant. The flash steam and organic vapors are discharged to the high and low pressure flash- off. Vapors and SO2 are sent to the evaporators and then to an absorption tower or acid storage. Spent liquor is sent to the recovery boilers.

Process: 403 is located at SULFUR BURNER, Building PULP - Molten sulfur is stored prior to burning in the presence of oxygen to form SO2 which is subsequently absorbed in ammonia to make sulfite liquor.

Process: 405 is located at Building PULP - Chlorine dioxide bleaching of the pulp occurs.

Process: 406 is located at Building PULP - Caustic extraction of the pulp occurs.

Process: 407 is located at Building PULP - Chlorine dioxide is generated through the R-8 process.

Process: 408 is located at Building PULP - Process consists of filtrate storage.

Emission unit 500000 - Emission unit 5-00000 is the facility's wastewater treatment unit. The unit consists of the wastewater collection system and the wastewater treatment system. The wastewater collection system consists of 5 pump or lifts stations for various areas of the facility. The wastewater treatment system consists of the following emission points: two mix tank vents, three primary clarifiers, two aeration basins, three secondary clarifiers, two gravity thickeners, a dewatering basin, and three belt filter presses.

Emission unit 500000 is associated with the following emission points (EP):
50006, 50007, 50008, 50024, 50025
Process: 502 is located at Various Locations, Building MISC - Process 502 consists of process wastewater collection. Wastewater from the paper mill, bark, recovery, woodroom, and pulp mill areas is collected through lift stations or pump stations and eventually sent to the wastewater treatment plant.

Process: 503 is located at Wastewater Treatment, Building WWT - Process 503 consists of the wastewater treatment plant. The process contains a mix tank, three primary clarifiers, two aeration basins, three secondary clarifiers, two gravity thickeners, three belt filter presses, a sludge blend tank and a dewatering basin.

Emission unit 600000 - This emission unit consists of the wood chipping, debarking, and wood chip storage piles.

Emission unit 600000 is associated with the following emission points (EP):
60001, 60002, 60003, 60004, 60005, 60006, 60007, 60008, 60009, 60010, 60011, 60012, 60013, 60014, 60015
Process: 601 is located at Building WOOD - Process consists of removing bark from wood using a drumming system.

Process: 602 is located at Building WOOD - This process consists of cutting wood into chips.

Process: 603 is located at Building WOOD - Process consists of pay loader moving bark from piles located in the wood yard to a conveyor that moves the bark to storage in the power plant.

Process: 604 Process consists of air-entrained transport of wood chips, with cyclones for retrieval and disposition of wood dust.

Process: 605 Process consists of offloading logs and moving logs to debarking using cranes.

Emission unit 700000 - This emission unit consists of miscellaneous plant support operations including paper trim baling and a babbitt pot for wood chipper maintenance.

Emission unit 700000 is associated with the following emission points (EP):
70003, 70005
Process: 703 is located at Building MISC - This process consists of collecting and baling paper trim.

Process: 705 is located at Building MISC - This process consists of using the babbitt pot for maintaining wood chipper knives.

Emission unit 800000 - Emission unit 800000 contains the facility's miscellaneous storage vessels. The tanks are located at various places in the facility.

Emission unit 800000 is associated with the following emission points (EP):
00007, 80001, 80016, 80019
Process: 801 is located at Building MISC - Process consists of storing volatile organic liquids in tanks with capacities greater than 10,000 gallons but less than 20,000 gallons. Submerged filling process is used to minimize working losses.

Process: 802 is located at Building MISC - Process consists storing volatile organic liquids in tanks smaller than 10,000 gallons.

Process: 803 is located at Building MISC - Process consists of storage of liquids that are not volatile organic liquids.

Title V/Major Source Status
FINCH PAPER LLC is subject to Title V requirements. This determination is based on the following information:
The facility is a major source of the following:
Sulfur Dioxide
Nitrogen Oxides
Carbon Monoxide
Particulates 10 micron and less (PM-10)
Volatile Organic Compounds
Hazardous Air Pollutants

Program Applicability
The following chart summarizes the applicability of FINCH PAPER LLC with regards to the principal air pollution
regulatory programs:

Regulatory Program	Applicability
PSD	NO
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
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL

	INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-009-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Bark-Fired Boiler (> 50,000 LB Steam)
3-01-870-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) Specify Liquid: Working Loss
3-02-016-82	FOOD AND AGRICULTURE FOOD AND AGRICULTURE - SUGAR BEET PROCESSING LIME CRUSHER
3-07-001-14	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:BLEACHING REACTORS
3-07-001-15	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:CHLORINE DIOXIDE
3-07-001-22	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT) PULPING:CAUSTIZING:GENERAL
3-07-002-22	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFITE PULPING Recovery System: NH3
3-07-002-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFITE PULPING SEE COMMENT **
3-07-003-01	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - NEUTRAL SULFITE SEMICHEMICAL PULPING Digester/Blow Pit/Dump Tank
3-07-003-04	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - NEUTRAL SULFITE SEMICHEMICAL PULPING Sulfur Burner/Absorbers
3-07-004-03	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PULPBOARD MANUFACTURE PULP & PAPER BOARD: RAW MATERIAL STORAGE & HANDLING
3-07-004-05	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PULPBOARD MANUFACTURE PULP & PAPER BOARD: PAPER/BOARD FORMING
3-07-008-01	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS Log Debarking
3-07-008-20	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIPPING AND SCREENING
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

3-07-040-02	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER AND WOOD PRODUCTS STOCKPILES - WOOD/BARK
3-12-999-99	MACHINERY, MISCELLANEOUS ELECTRICAL EQUIPMENT - MISCELLANEOUS MACHINERY Other Not Classified
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments
5-03-007-02	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE TREATMENT-GENERAL
5-03-825-99	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - WASTEWATER, POINTS OF GENERATION WASTEWATER: SPECIFY POINT OF GENERATION

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
000120-82-1	1,2,4-TRICHLOROBENZENE		> 0 but < 10 tpy
000088-06-2	2,4,6 TRICHLOROPHENOL		> 0 but < 10 tpy
000075-07-0	ACETALDEHYDE		> 0 but < 10 tpy
000107-02-8	ACROLEIN		> 0 but < 10 tpy
007664-41-7	AMMONIA		>= 2.5 tpy but < 10 tpy
000071-43-2	BENZENE		> 0 but < 10 tpy
000080-56-8	BICYCLO(3.1.1)HEPT-2-ENE, 2,6,6-TRIMETHYL C10H16		> 0 but < 2.5 tpy
000117-81-7	BIS(2-ETHYLHEXYL) PHTHALATE		> 0 but < 10 tpy
001305-78-8	CALCIUM OXIDE		> 0 but < 2.5 tpy

000630-08-0	CARBON MONOXIDE	>= 250 tpy but < 75,000 tpy
000056-23-5	CARBON TETRACHLORIDE	> 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
000075-09-2	DICHLOROMETHANE	> 0 but < 10 tpy
000120-83-2	DICHLOROPHENOL, 2,4	> 0 but < 2.5 tpy
000067-64-1	DIMETHYL KETONE	> 0 but < 2.5 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO	> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE	> 0 but < 10 tpy
0NY100-00-0	HAP	>= 100 tpy but < 250 tpy
000110-54-3	HEXANE	> 0 but < 10 tpy
007647-01-0	HYDROGEN CHLORIDE	> 0 but < 10 tpy
007439-92-1	LEAD	> 0 but < 10 tpy
001317-65-3	LIMESTONE	>= 2.5 tpy but < 10 tpy
007439-96-5	MANGANESE	> 0 but < 10 tpy
000067-56-1	METHYL ALCOHOL	>= 10 tpy
000074-87-3	METHYL CHLORIDE	> 0 but < 10 tpy
000078-93-3	METHYL ETHYL KETONE	> 0 but < 10 tpy
000091-20-3	NAPHTHALENE	> 0 but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	> 0 but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 250 tpy but < 75,000 tpy
0NY075-00-0	PARTICULATES	>= 250 tpy but < 75,000 tpy
000127-18-4	PERCHLOROETHYLENE	> 0 but < 10 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
000100-42-5	STYRENE	> 0 but < 10 tpy
007704-34-9	SULFUR	> 0 but < 2.5 tpy
007446-09-5	SULFUR DIOXIDE	>= 250 tpy but < 75,000 tpy
007664-93-9	SULFURIC ACID	>= 100 tpy but < 250 tpy
000108-88-3	TOLUENE	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 250 tpy but < 75,000 tpy
001330-20-7	XYLENE, M, O & P MIXT.	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.
(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item 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 201-6.3(a)(4)

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

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)
Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official.This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)
The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 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 201-6.5(a)(6)
This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

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

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

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 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	66	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A.10	27, 28, 29	Recordkeeping and Reporting
3-20000	40CFR 63-MM	49	Pulp & Paper Chemical Recovery Combustion MACT
FACILITY	40CFR 63-MM.864(k)	30	Monitoring Requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
4-00000	40CFR 63-S.444(c)(2)(i)	51	Pulp & Paper - Sulfite Pulping Standards
4-00000/-/405	40CFR 63-S.445(b)	57	Pulp & Paper - Bleaching System Standards
4-00000/-/405/00437	40CFR 63-S.445(c)(2)	58, 59, 60	Pulp & Paper - Bleaching System Standards
4-00000	40CFR 63-S.453(k)	52	Pulp & Paper - Monitoring Requirements (Enclosure & Closed Vent)
4-00000	40CFR 63-S.453(m)	53	Pulp & Paper - Monitoring Requirements (Alternative Techniques)
4-00000/-/405/00437	40CFR 63-S.453(o)	61	Pulp & Paper - Monitoring Requirements (Violations)
4-00000	40CFR 63-S.454(b)	54	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.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	1 -10	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	22	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	12	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	13	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 31, 32	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	14	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	1 -1	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	15	General conditions
FACILITY	6NYCRR 201-6.5(c)	3	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(2)	4	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(c)(3)(ii	5	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.5(d)(5)	16	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	17	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	24	Permit shield
FACILITY	6NYCRR 202-1.1	1 -3	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 211.2	1 -11	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	19	General Prohibitions - visible emissions limited
3-20000	6NYCRR 212.10(c)(3)	1 -6	NOx and VOC RACT required at major facilities
3-20000/00012	6NYCRR 212.4(a)	1 -12	General Process Emission Sources - emissions from new sources and/or modifications
4-00000/-/401/00402	6NYCRR 212.4(a)	55, 1 -9	General Process Emission Sources -

			emissions from new sources and/or modifications
4-00000/-/407/00446	6NYCRR 212.4(a)	62, 63	General Process Emission Sources - emissions from new sources and/or modifications
2-00000	6NYCRR 212.4(c)	33	General Process Emission Sources - emissions from new processes and/or modifications
3-20000/00012	6NYCRR 212.4(c)	1 -7	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	69	General Process Emission Sources - opacity of emissions limited
3-20000/00012	6NYCRR 212.6(a)	1 -8	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	1 -2	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(d)	25	Sulfur-in-fuel limitations - Table 2
3-00000/-/311	6NYCRR 227-1	40	Stationary Combustion Installations
3-00000/00009	6NYCRR 227-1.2(a)(1)	1 -4	Particulate Emissions from Liquid Fuels.
3-10000/00011	6NYCRR 227-1.2(a)(4)	44, 1 -5	Particulate Emissions Firing Soild Fuels.
FACILITY	6NYCRR 227-1.3(a)	26	Smoke Emission Limitations.
3-00000	6NYCRR 227-1.3(a)	34	Smoke Emission Limitations.
3-10000/00011	6NYCRR 227-1.3(a)	46	Smoke Emission Limitations.
3-00000	6NYCRR 227-1.4(a)	70	Stack Monitoring. (see narrative)
3-00000	6NYCRR 227-1.4(b)	35	Stack Monitoring
3-10000	6NYCRR 227-1.5	42	Fuel mixtures.
3-00000	6NYCRR 227-2.3(c)	36	Compliance plan and deadlines.
3-00000	6NYCRR 227-2.5(c)	37, 38, 39	Alterative emission limits
3-10000	6NYCRR 227-2.6(a)(3)	43	Testing, monitoring, reporting requirements for large boilers.
8-00000/-/801	6NYCRR 229.3(e)(2)(iv)	64	Volatile organic liquid storage tanks
8-00000/-/802	6NYCRR 229.3(e)(2)(v)	65	Volatile organic liquid storage tanks

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 201-6.5 (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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 201-6.5 (c)
This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

6 NYCRR 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.

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 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 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 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, FINCH PAPER LLC has been determined to be subject to the following regulations:

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 63.444 (c) (2) (i)
Emit no more than 1.1 kilograms of total HAP or methanol per megagram (2.2 pounds per ton) of ODP;

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;

40 CFR 63.453 (k)
This details inspections and tests required to demonstrate that closed vent systems carrying HAPs to a control device do not leak.

40 CFR 63.453 (m)
This requires monitoring of specific parameters to demonstrate that processes and controls are operating within ranges that keep emissions within established limits.

40 CFR 63.453 (o)
This requires monitoring of parameters of control devices to ensure that the control devices operate effectively

40 CFR 63.454 (b)
This requires a site specific inspection plan for closed vent and closed collection systems.

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 Part 63, Subpart MM
This regulates particulate and hazardous air pollutant emissions from combustion sources at pulp and paper mills

6 NYCRR 212.10 (c) (3)
Acceptable NOx RACT compliance plans submitted to the Department will become part of the State SIP.

6 NYCRR 212.4 (a)
This rule requires compliance with the degree of control specified in Tables 2, 3 and 4 for new (after July 1, 1973) process emission sources.

6 NYCRR 212.4 (c)
This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to an particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

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 225-1.2 (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)

6 NYCRR 227-1.2 (a) (1)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units of greater than 250 mmBtu/hr heat input capacity which fire coal, oil, or coal derived fuels.

6 NYCRR 227-1.2 (a) (4)
This regulation establishes a particulate emission limit in terms of lbs per mmBtu of heat input for stationary combustion units which fire solid fuels at variable sizes of heat input (mmBtu/hr).

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 227-1.4 (a)
This requires a continuous opacity monitor for combustion installations with heat input capacity exceeding 250 million Btu's per hour.

6 NYCRR 227-1.4 (b)
This regulation requires the specific contents of excess emissions reports for opacity from facilities that employ continuous opacity monitors (COMs).

6 NYCRR 227-1.5
This regulation provides for determination of a permissible particulate emission rate from combustion devices using more than one type of fuel simultaneously.

6 NYCRR 227-2.3 (c)
This requires an operating plan for complying with the facility's alternative NOX RACT limit.

6 NYCRR 227-2.5 (c)
This allows for establishing an alternative RACT emission limit when the facility can demonstrate that it cannot physically or economically meet the established limit.

6 NYCRR 227-2.6 (a) (3)
Requires NOx emission testing for large boilers.

6 NYCRR 229.3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids

6 NYCRR 229.3 (e) (2) (v)
This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR Subpart 227-1
This regulation concerns opacity and particulate emission requirements for stationary combustion installations.

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

Location Facility/EU/EP/Process/ES	Regulation	Short Description
1-00000	6 NYCRR 212.10 (c) (1)	NOx and VOC RACT required at major facilities

Reason: Paper machines are not subject to VOC RACT because no emission point has an emission rate potential of 3 pounds per hour or more.

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 FINCH PAPER LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	29	record keeping/maintenance procedures
3-20000	49	record keeping/maintenance procedures
FACILITY	30	monitoring of process or control device parameters as surrogate
4-00000	51	intermittent emission testing
4-00000/-/405/00437	58	intermittent emission testing
4-00000/-/405/00437	59	monitoring of process or control device parameters as surrogate
4-00000/-/405/00437	60	monitoring of process or control device parameters as surrogate

4-00000	52	record keeping/maintenance procedures
4-00000	53	work practice involving specific operations
4-00000/-/405/00437	61	monitoring of process or control device parameters as surrogate
4-00000	54	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
3-20000	1-6	continuous emission monitoring (cem)
3-20000/00012	1-12	continuous emission monitoring (cem)
4-00000/-/401/00402	1-9	monitoring of process or control device parameters as surrogate
4-00000/-/401/00402	55	continuous emission monitoring (cem)
4-00000/-/407/00446	62	intermittent emission testing
4-00000/-/407/00446	63	continuous emission monitoring (cem)
2-00000	33	intermittent emission testing
3-20000/00012	1-7	intermittent emission testing
FACILITY	69	record keeping/maintenance procedures
3-20000/00012	1-8	record keeping/maintenance procedures
FACILITY	25	work practice involving specific operations
3-00000/-/311	40	record keeping/maintenance procedures
3-00000/00009	1-4	intermittent emission testing
3-10000/00011	1-5	intermittent emission testing
3-10000/00011	44	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
3-00000	34	monitoring of process or control device parameters as surrogate
3-10000/00011	46	record keeping/maintenance procedures
3-00000	70	monitoring of process or control device parameters as surrogate
3-00000	35	record keeping/maintenance procedures
3-00000	36	record keeping/maintenance procedures
3-00000	37	intermittent emission testing
3-00000	38	record keeping/maintenance procedures
3-00000	39	record keeping/maintenance procedures
3-10000	43	record keeping/maintenance procedures
8-00000/-/801	64	record keeping/maintenance procedures
8-00000/-/802	65	record keeping/maintenance procedures

Basis for Monitoring

Bleaching Sources - 40CFR63 Subpart S 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 using a scrubber. The monitoring scheme to ensure compliance includes an initial stack test to demonstrate initial compliance and to establish pH, exhaust flow rate and scrubber filtrate flow rate parameters. 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. The chlorine dioxide generator is not subject to Subpart S but is regulated by 6NYCRR Part 212. This requires a scrubber to control emissions to less than 105 ppm and a continuous emissions monitor for chlorine dioxide to monitor emissions.

Pulping Sources - 40CFR63 Subpart S requires that total methanol emissions from designated sources not exceed 2.2 pounds per oven dried ton of pulp. Emissions testing has demonstrated that within approved digester rate parameters, the facility meets this requirement with no emissions controls. Digerter rate is monitored daily to ensure that it does not exceed 525 tons per day.

Sulfur Burner - This source is also regulated by 6 NYCRR Part 212 to control sulfur dioxide emisssions. These emissions are controlled by a scrubber with emissions rate of less than 10 pounds per hour. The pH of the scrubber solution is continuously monitored and a continuous emissions monitor records SO2 emissions.

NOx RACT - A NOx RACT study for the power boilers, wood waste boiler and recovery boilers established nitrogen oxides (NOx) emission limits. The wood waste boiler met RACT as operated and requires only periodic testing to ensure it continues to meet emission limits. The power boilers and recovery boilers must meet emission unit wide average emission rates based on the fuel used and specific emission rate for each boiler in the unit. Emission rate averages are calculated monthly. Once each permit term, a stack test is performed to ensure that the sources are still in compliance with those limits. If the operation of the sources changes, the Department may require additional testing. Additionally, the power boilers must operate on natural gas unless the cost differential for oil and natural gas exceeds $0.58 per million Btu.

Misc. Particulate Emissions - The power boilers, recovery boilers, and waste wood boiler are all subject to stack testing for particulates once during each permit term. Additionally the power boilers have a continuous opacity monitor used when oil is being burned. When not burning natural gas exclusively, the recovery boilers exhaust through absorbers and mist eliminators and opacity monitors. The wood waste boiler is controlled by a scrubber. When not burning natural gas exclusively, both the waste wood boiler and recovery boilers are observed daily for opacity.