New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5326-00004/00049
Renewal Number: 2
03/03/2011

Facility Identification Data
Name: HOLLINGSWORTH & VOSE-EASTON MILL
Address: 3235 CO RTE 113
GREENWICH, NY 12834

Owner/Firm
Name: HOLLINGSWORTH & VOSE CO
Address: 112 WASHINGTON ST
EAST WALPOLE, MA 02032-1098, USA
Owner Classification: Corporation/Partnership

Permit Contacts
Division of Environmental Permits:
Name: MARC S MIGLIORE
Address: NYSDEC
232 GOLF COURSE RD
WARRENSBURG, NY 12885
Phone:5186231281

Division of Air Resources:
Name: RANDY L LAROSE
Address: 232 GOLF COURSE RD
WARRENSBURG, NY 12885
Phone:5186231212

Air Permitting Facility Owner Contact:
Name: VIRGINIA L KEEFER
Address: HOLLINGSWORTH & VOSE CO
5035 CO RTE 113
GREENWICH, NY 12834
Phone:5186958175

Permit Description

Introduction

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

Summary Description of Proposed Project
Application for renewal of Air Title V Facility.

This application includes to two minor modifications to existing monitoring conditions. The scrubber water flow rate averaging method for the formaldehyde scrubber (ES 010SC) used to control emissions

from paper machine number 10 is being changed to a one hour average to be more consistent with performance testing data. The scrubber water flow rate limit will remain the unchanged. In addition, the monitoring option selected in accordance with 40 CFR 63, Subpart JJJJ, for limiting organic HAPs is being changed from an "as purchased" to a "as applied" basis method. The actual standard will remain the unchanged.

Attainment Status
HOLLINGSWORTH & VOSE-EASTON MILL is located in the town of EASTON in the county of WASHINGTON.
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:
Hollingsworth & Vose Company's Easton Mill is a manufacturer of technical industrial papers and non-woven fabrics. The facility operates three paper machines which form, coat/saturate, and in some cases cure the products made. The facility has two boilers, both of which are capable of burning No. 6 fuel oil or natural gas.

Permit Structure and Description of Operations
The Title V permit for HOLLINGSWORTH & VOSE-EASTON 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.

HOLLINGSWORTH & VOSE-EASTON MILL is defined by the following emission unit(s):

Emission unit UBOILR - Two (2) boilers with combined heat input capacity of 75.9 mmBtu/hr fired with either No. 6 fuel oil or natural gas.

Emission unit UBOILR is associated with the following emission points (EP):
00018
Process: 001 is located at FIRST, Building BOILERHOUS - Two small boilers whose combined heat input capacity is 75.9 mmBtu/hr; this process involves firing them with No. 6 fuel oil.

Process: 002 is located at FIRST, Building BOILERHOUS - Two small boilers whose combined heat input capacity is 75.9 mmbtu/hr; this process involves firing them with natural gas.

Emission unit UBROKE - Broke is processed for reuse in paper making operations. It is first broken down using caustic and steam heat in a beater type mixer (PR 003) vented to emission point 00024. Then, it is washed in a process also using caustic and steam heat in a beater type mixer (PR 004) vented to emission point 00025.

Emission unit UBROKE is associated with the following emission points (EP):
00024, 00025
Process: 003 is located at FIRST, Building EASTON MIL - Exhaust vent from broke beater. Caustic is added to broke and broke is steam heated. Vapors are vented to outside air.

Process: 004 is located at FIRST, Building EASTON MIL - Exhaust vent from broke wash beater. Caustic is added to broke and broke is steam heated. The vapors are vented to the outside air.

Emission unit UMIXRS - Chemical mixing exhaust system - includes one mixing tank (ES MIXR1) used for mixing of ingredients such as clay and titanium dioxide with liquid ingredients and vented to Emission Point No. 009A7.

Emission unit UMIXRS is associated with the following emission points (EP):
009A7
Process: 00A is located at FIRST, Building EASTON MIL - Chemical mixing of ingredients such as clay and titanium dioxide.

Emission unit UPAPER - Paper making operations on Paper Machine Nos. 8, 9 and 10. This includes

forming, drying and coating/saturating of a paper or fabric web on each of the three machines. Paper Machine Nos. 8, 9 and 10 also have natural gas fired curing units to enhance sheet properties through additional drying.

Emission unit UPAPER is associated with the following emission points (EP):
008A1, 008A2, 008A3, 008A4, 008A5, 008A6, 009A1, 009A2, 009A3, 010A1, 010A2, 010A3, 09C10
Process: 016 is located at FIRST, Building EASTON MIL - Various coatings/binders may be applied to the paper web at different points, depending upon the machine being used and the formulation being made. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units. Emissions from Paper Machine No. 10's "dry-end" (DRY10) are vented to wet scrubber (010CS) and exhausted through emission point 09C10.

Process: 0AA is located at Easton Mill, Building EASTON MIL - On No. 8 Paper Machine, a wet web of paper passes over steam heated can dryers. For some papers, sprays are applied (see Process ID AAA). For some papers, infrared curing is used to enhance paper properties. Exhausts are vented to 4 emission points on roof. In addition, 2 emission points may be added to this source as previously approved.

Process: 0BB is located at FIRST, Building EASTON MIL - On Paper Machine No. 9 wet end, a wet web of paper is formed and passes over steam heated can dryers. For some papers, sprays are applied (see Process ID 016). The exhausts are vented to 3 emission points on roof.

Process: 0CC is located at FIRST, Building EASTON MIL - On Paper Machine No. 10 a wet web of paper is formed and passes over steam heated can dryers and thru-dryer. The exhausts are vented to 3 emission points on roof.

Process: AAA is located at Easton Mill, Building EASTON MIL - Coatings are sprayed onto the paper web on Paper Machine No. 8.

Title V/Major Source Status
HOLLINGSWORTH & VOSE-EASTON MILL is subject to Title V requirements. This determination is based on the following information:
Hollingsworth & Vose Company's Easton Mill is classified as a major stationary source under Title V. This determination is based on the following information:

- Hollingsworth & Vose Company's Easton Mill has the potential to emit Sulfur Dioxide of 169 tons per year which exceeds the major source threshold of 100 tons per year; and

- Hollingsworth & Vose Company's Easton Mill has the potential to emit a single Hazardous Air Pollutant (HAP) in excess of 10 tons per year which exceeds the major source threshold of 10 tons per year; and

- Hollingsworth & Vose Company's Easton Mill has the potential to emit Hazardous Air Pollutants (HAP's) in excess of 40 tons per year which exceeds the major source threshold of 25 tons per year.

Program Applicability
The following chart summarizes the applicability of HOLLINGSWORTH & VOSE-EASTON MILL 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
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
1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-07-999-01	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - OTHER NOT CLASSIFIED PULP & PAPER & WOOD PRODUCTS:OTHER NOT CLASSIFIED:BATTERY SEPARATORS
3-07-999-99	PULP & PAPER AND WOOD PRODUCTS

	PULP & PAPER & WOOD - OTHER NOT CLASSIFIED SEE COMMENT **
4-02-013-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing

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
000107-21-1	1,2-ETHANEDIOL		> 0 but < 10 tpy
000096-23-1	1,3-DICHLORO-2-PROPANOL		> 0 but < 2.5 tpy
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER		> 0 but < 10 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER		> 0 but < 10 tpy
000630-08-0	CARBON MONOXIDE		>= 2.5 tpy but < 10 tpy
000100-41-4	ETHYLBENZENE		> 0 but < 10 tpy
000050-00-0	FORMALDEHYDE		> 0 but < 10 tpy
0NY100-00-0	HAP		>= 40 tpy but < 50 tpy
000067-56-1	METHYL ALCOHOL		>= 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	166000	
0NY075-00-0	PARTICULATES		>= 10 tpy but < 25 tpy
000107-41-5	PENTANEDIOL,METHYL		> 0 but < 2.5 tpy
000108-95-2	PHENOL		> 0 but < 10 tpy
0NY075-00-5	PM-10		>= 10 tpy but < 25 tpy
009004-99-3	POLYOXYETHYLENE STEARATE (C2H4O)		> 0 but < 2.5 tpy
000100-42-5	STYRENE		> 0 but < 10 tpy
007446-09-5	SULFUR DIOXIDE	338000	
007664-93-9	SULFURIC ACID		> 0 but < 2.5 tpy

0NY998-00-0	VOC	>= 40 tpy but < 50 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	54	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 52-A.21	26, 27, 28	Prevention of Significant Deterioration
FACILITY	40CFR 63-JJJJ.3320(b)(3	37	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
FACILITY	40CFR 63-JJJJ.3410(a)	38	Paper and Other Web Coating NESHAP - Record keeping requirements.
FACILITY	40CFR 63-ZZZZ.6585	39	Reciprocating Internal Combustion Engine (RICE) NESHAP - Applicability
FACILITY	40CFR 68	21	Chemical accident prevention provisions
FACILITY	40CFR 82-F	22	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	55	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	23, 40, 41	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.5(a)(4)	15	General conditions
FACILITY	6NYCRR 201-6.5(a)(7)	2	General conditions Fees
FACILITY	6NYCRR 201-6.5(a)(8)	16	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)	17	Compliance schedules
FACILITY	6NYCRR 201-6.5(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.5(f)(6)	18	Off Permit Changes
FACILITY	6NYCRR 201-6.5(g)	24	Permit shield
FACILITY	6NYCRR 201-7	25, 26, 27, 28	Federally Enforceable Emissions Caps
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 211.2	56	General Prohibitions - air pollution prohibited.
FACILITY	6NYCRR 211.3	20	General Prohibitions - visible emissions limited
FACILITY	6NYCRR 212.4(a)	29, 30, 31, 32	General Process Emission Sources - emissions from new sources and/or modifications
U-BROKE	6NYCRR 212.4(a)	45	General Process Emission Sources - emissions from new sources and/or modifications
U-MIXRS	6NYCRR 212.4(a)	46	General Process

			Emission Sources - emissions from new sources and/or modifications
U-PAPER	6NYCRR 212.4(a)	48, 49	General Process Emission Sources - emissions from new sources and/or modifications
U-PAPER/-/016/010SC	6NYCRR 212.4(a)	50	General Process Emission Sources - emissions from new sources and/or modifications
U-PAPER/-/0BB/0WET9	6NYCRR 212.4(a)	51	General Process Emission Sources - emissions from new sources and/or modifications
U-PAPER/-/AAA	6NYCRR 212.4(a)	52	General Process Emission Sources - emissions from new sources and/or modifications
U-PAPER/09C10/016	6NYCRR 212.4(a)	53	General Process Emission Sources - emissions from new sources and/or modifications
U-MIXRS/009A7	6NYCRR 212.4(c)	47	General Process Emission Sources - emissions from new processes and/or modifications
FACILITY	6NYCRR 212.6(a)	33	General Process Emission Sources - opacity of emissions limited
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(a)(2)	34	Sulfur in Fuel Limitations Post 12/31/87.
U-BOILR/00018/001	6NYCRR 227.2(b)(1)	44	Particulate emissions.
U-BOILR/00018/001	6NYCRR 227-1.3	43	Smoke Emission Limitations.
U-BOILR/00018	6NYCRR 227-1.3(a)	42	Smoke Emission Limitations.
FACILITY	6NYCRR 227-2	27, 28	Reasonably available control technology for NOx
FACILITY	6NYCRR 228-1.10	36	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.7	35	Table 1
FACILITY	6NYCRR 231-2	27, 28	New Source Review in Nonattainment Areas and Ozone Transport Region

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, HOLLINGSWORTH & VOSE-EASTON MILL has been determined to be subject to the following regulations:

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

The facility is capped out of this requirement for SO2 and NOx. These caps were established in 1995 to prevent the need for a full Prevention of Significant Deterioration (PSD) review, under 40 CFR 52.21(i), when Paper Machine No. 8 was installed.

40 CFR 63.3320 (b) (3)
This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3410 (a)
This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.6585
This condition details what criteria are used to determine if a reciprocating internal combustion engine is subject to the provisions of this NESHAP rule. If the engine is meets the rule's definition of reciprocating internal combustion engine, and is located at a facility that emits at least 10 tons of a single hazardous air pollutant or 25 tons of all hazardous air pollutants, then the engine will need to meet the provisions in this rule.

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

6 NYCRR 227.2 (b) (1)
This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 227-1.3
This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

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 228-1.10
This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.7
Table 1 lists the processes and a description of products that are regulated by Part 228 and the maximum permitted pounds of volatile organic compounds per gallon of coating at application.

6 NYCRR Subpart 201-7
This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit the caps are on emissions of Sulfur Dioxide (SO2) and Oxides of Nitrogen (NOx) from this facility and have been capped at 169 tpy and 83 tpy, respectively.

6 NYCRR Subpart 227-2
This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6 NYCRR Subpart 231-2
The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern

state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

The facility is capped out of this requirement for NOx. This cap was established in 1995 to prevent the need for a full Prevention of Significant Deterioration (PSD) review, under 40 CFR 52.21(i), when Paper Machine No. 8 was installed.

Compliance Certification
Summary of monitoring activities at HOLLINGSWORTH & VOSE-EASTON MILL:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring
FACILITY	37	work practice involving specific operations
FACILITY	38	record keeping/maintenance procedures
FACILITY	39	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	26	monitoring of process or control device parameters as surrogate
FACILITY	27	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
U-BROKE	45	record keeping/maintenance procedures
U-MIXRS	46	record keeping/maintenance procedures
U-PAPER	48	record keeping/maintenance procedures
U-PAPER	49	monitoring of process or control device parameters as surrogate
U-PAPER/-/016/010SC	50	monitoring of process or control device parameters as surrogate
U-PAPER/-/0BB/0WET9	51	monitoring of process or control device parameters as surrogate
U-PAPER/-/AAA	52	intermittent emission testing
U-PAPER/09C10/016	53	intermittent emission testing
U-MIXRS/009A7	47	monitoring of process or control device parameters as surrogate
FACILITY	33	monitoring of process or control device parameters as surrogate
FACILITY	34	work practice involving specific operations
U-BOILR/00018/001	44	intermittent emission testing
U-BOILR/00018/001	43	record keeping/maintenance procedures
U-BOILR/00018	42	monitoring of process or control device parameters as surrogate

FACILITY	36	record keeping/maintenance procedures
FACILITY	35	monitoring of process or control device parameters as surrogate

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Basis for Monitoring
Daily check of visible emissions from process sources and coating lines will be performed at the facility. This will help to ensure that the 20% opacity limit is being met and should help to alert the source owner to unusual process conditions that might result in excess emissions if left unchecked. However, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at its discretion

The use of residual fuel oil (or No. 6 fuel oil in this case) containing more than 1.5% sulfur as fuel for the boilers at the facility is prohibited Source owner must be able to document that each shipment of oil received meets this requirement. The main purpose of this is to mitigate emissions of sulfur dioxide and particulate matter when burning residual oil.

Emissions of Oxides of Nitrogen (NOx) from this facility are capped at less than 83 tons per year. By keeping NOx emissions low, the facility is not subject to additional Reasonably Available or Best Available Control Technology or Lowest Achieveable Emission Rate (RACT or BACT or LAER) requirements contained in State RACT (6NYCRR 227-2) or Federal Prevention of Significant Deterioration (PSD, 40CFR 52) or State New Source Review (6NYCRR Part 231-2) rules. Compliance with this cap must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

Emissions of Sulfur Dioxide (SO2) from this facility are capped at less than 169 tons per year. By keeping SO2 emissions below this level, the facility is not subject to additional Best Available Control Technology (BACT) requirements contained in Federal Prevention of Significant Deterioration (PSD, 40CFR 52) rules. Compliance with this cap must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

Opacity (visible emissions) from the boiler stack shall be less than 20%, except for one 6-minute period per hour of not more than 27%. Opacity is used as a surrogate to indicate the level of particulate matter being emitted from the source. Since a COM is not utilized, compliance with this limit will be demonstrated through daily observations of visible emissions from the boiler stack.

Boilers at the facility shall be stack tested once during the term of the permit to demonstrate compliance with the 0.1 pounds per million Btu particulate matter emission limit. This provides assurance that the boilers are properly operated. As noted above, visible emissions from the boiler stack must be monitored daily, and serve as a surrogate for compliance with the particulate matter limit.

Exhaust from the mixers (EP 009A7) at the facility shall be stack tested at the discretion of the Department to demonstrate compliance with the 0.05 grains per dry standard cubic foot particulate matter emission limit. Visible emissions from all permitted process exhausts, including this one, must be monitored daily. This will serve as a daily surrogate for compliance with the particulate matter limit. In addition, the source owner or operator will provide verification, using all pertinent records, on a semi-annual basis whether or not the facility has or has the potential to exceed this standard.

The amount of 1,3-dichloro-2-propanol that can be emitted from all three paper machines at the facility combined is limited to 3,720 pounds per year. The purpose of this limit is to ensure that the facility's potential ambient impacts from this contaminant are held below acceptable levels. Compliance with this limit must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

The amount of 1,3-dichloro-2-propanol that can be emitted from Paper Machine No. 9 sources alone is limited to 1,230 pounds per year. The purpose of this limit is to ensure that the facility's potential ambient impacts from this contaminant are held below acceptable levels. Compliance with this limit must be monitored monthly through product usage performed by the source owner for comparison to the limit.

The amount of formaldehyde that can be emitted per hour is limited to no more than 1.85 pounds from all three paper machines combined, with no more than 0.15 pounds of that total coming from Paper Machine No. 8. The purpose of these limits is to ensure that the facility's potential hourly ambient impacts from this contaminant are held below acceptable levels. Compliance with this limit must be monitored on a per batch basis through emissions calculations performed by the source owner for comparison to the limit. In addition, Paper Machine Nos. 9 & 10 sources will be stack tested once per year to determine compliance with the respective hourly formaldehyde emission rate limit noted above. This stack test will also serve to determine/verify the scrubber solution flow rate used for parametric monitoring of Paper Machine No. 10's wet scrubber (ES 010SC) performance. Paper Machine No. 8 shall be stack tested within 90 days of commencement of the use of formaldehyde-containing coatings (excluding R&D) and once per permit term there after.

The amount of formaldehyde that can be emitted per year is limited to no more than 7,170 pounds from all three paper machines combined, with no more than 420 pounds of that total coming from Paper Machine No. 8. The purpose of these limits is to ensure that the facility's potential annual ambient impacts from this contaminant are held below acceptable levels. Compliance with this limit must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

The source owner is required to maintain certification from their supplier or manufacturer to verify the information that has been used to determine the as applied Volatile Organic Compound (VOC) content of each of the coatings used at the facility. The purpose is to document compliance with the 2.9 pound per gallon limit on the as applied VOC content that the facility must meet under 6NYCRR Part 228. Purchase, usage and/or production records for coating materials must also be maintained for further verification, if necessary.

This facility owns or operates an affected source subject to 40 CFR Part 63, Subpart JJJJ. Subpart JJJJ limits organinc HAPs to no more than 20 percent of the mass of coating solids applied for each month at existing affected sources. Compliance with this standard shall be demonstrated by limiting each coating material, as-applied, to no more than 0.2 kg orgnaic HAP per kg coating solids. This will be demonstrated through monthly records.