

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

Facility Identification Data

Name: HOLLINGSWORTH & VOSE GREENWICH MILL
Address: ST RTE 29 - E SIDE
CENTER FALLS, NY 12834

Owner/Firm

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

Permit Contacts

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Air Permitting Facility Owner Contact:
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GREENWICH, NY 12834
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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.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006



Summary Description of Proposed Project

Application for renewal of Air Title V Facility and the addition of 40CFR 63, Subpart JJJJ requirements.

Attainment Status

HOLLINGSWORTH & VOSE GREENWICH MILL is located in the town of GREENWICH 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* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

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

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

Facility Description

Hollingsworth & Vose Company's Greenwich facility is a manufacturer of technical non-wovens. The facility operates one paper machine with several emission points. The facility has two boilers which burn No. 6 fuel oil or propane.

Permit Structure and Description of Operations

The Title V permit for HOLLINGSWORTH & VOSE GREENWICH 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



New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006

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 GREENWICH MILL is defined by the following emission unit(s):

Emission unit UBOILR - BOILER - 25 mmBTU/hr Hurst fired with either propane or No. 6 fuel oil

Emission unit UBOILR is associated with the following emission points (EP):
00008

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

Process: NO6 is located at FIRST, Building MILL - Fuel oil No. 6 fired 25 mmbtu/hr Hurst boiler.

Process: PRO is located at First, Building MILL - Propane fired 25 mmbtu/hr Hurst boiler.

Emission unit UPAPER - Paper making operations on paper machine No. 11. This includes forming, drying and coating of the paper web. This paper machine also has infrared units to cure certain coatings.

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

011A1, 011A2, 011A3, 011A4, 011A5, 011CS

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

Process: 00C is located at FIRST, Building MILL - On No. 11 paper machine, a wet web of paper is formed and then passes over steam heated can dryers and propane fired thru dryer. The thru dryer is exempt from permitting requirements under 6 NYCRR 201-3.2(c)(2).

Process: OCC is located at FIRST, Building MILL - Binders are applied to the web in a saturator. The saturated web passes over steam heated can dryers and propane fired infrared unit(s). Exhausts are vented to a common stack (011CS).

Title V/Major Source Status

HOLLINGSWORTH & VOSE GREENWICH MILL is subject to Title V requirements. This determination is based on the following information:

Hollingsworth and Vose Company's Greenwich Mill is classified as a major stationary source under Title V. This determination is based on the following information:

-Hollingsworth & Vose Company's Greenwich 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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006



year;

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

-Hollingsworth & Vose Company's Greenwich Mill has the potential to emit Sulfur Dioxide emissions in excess of 100 tons per year which exceeds the major source threshold of 100 tons per year.

Program Applicability

The following chart summarizes the applicability of HOLLINGSWORTH & VOSE GREENWICH 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	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

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

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

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006



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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

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
1-02-010-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - LIQUEFIED PETROLEUM GAS (LPG) Propane
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
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

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

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	Range
000107-21-1	1,2-ETHANEDIOL (HAP)	> 0	but < 10 tpy
000096-23-1	1,3-DICHLORO-2-PROPANOL	> 0	but < 2.5 tpy
000108-05-4	ACETIC ACID ETHENYL ESTER (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 2.5	tpy but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	> 0	but < 10 tpy
0NY100-00-0	HAP	>= 40	tpy but < 50 tpy
000067-56-1	METHYL ALCOHOL (HAP)	>= 10	tpy
0NY210-00-0	OXIDES OF NITROGEN	>= 50	tpy but < 100 tpy
0NY075-00-0	PARTICULATES	>= 2.5	tpy but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0	but < 10 tpy
0NY075-00-5	PM-10	>= 2.5	tpy but < 10 tpy
007446-09-5	SULFUR DIOXIDE	>= 100	tpy but < 250 tpy
0NY998-00-0	VOC	>= 40	tpy but < 50 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

(b) In any enforcement proceeding, the facility owner and/or operator

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

seeking to establish the occurrence of an emergency has the burden of proof.

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

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

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

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

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

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

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

violation of applicable requirements prior to or at the time of permit issuance;

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

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

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

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Short Description	Condition
FACILITY	ECL 19-0301	Powers and Duties of the Department with respect to air pollution control	43
FACILITY	40CFR 60-Dc.42c(d)	Standard for Sulfur Dioxide Firing Oil. (see narrative)	25
U-BOILR	40CFR 60-Dc.48c(e) (11)	Reporting and Recordkeeping requirements - fuel supplier certifications	29
U-BOILR	40CFR 60-Dc.48c(g)	Reporting and Recordkeeping Requirements.	30
U-PAPER/-/OCC	40CFR 63-JJJJ.3370 (b)	Paper and Other Web Coating NESHAP - Requirements for showing compliance	40
U-PAPER/-/OCC	40CFR 63-JJJJ.3400 (c)	Paper and Other Web Coating NESHAP - reporting - semiannual compliance report	41
U-PAPER/-/OCC	40CFR 63-JJJJ.3410 (a)	Paper and Other Web Coating NESHAP - Record keeping requirements.	42
FACILITY	40CFR 68	Chemical accident prevention provisions	19
FACILITY	40CFR 82-F	Protection of Stratospheric Ozone - recycling and emissions reduction	20
FACILITY	6NYCRR 200.6	Acceptable ambient air quality.	1
U-PAPER	6NYCRR 200.6	Acceptable ambient air quality.	32
FACILITY	6NYCRR 200.7	Maintenance of equipment.	9
FACILITY	6NYCRR 201-1.4	Unavoidable noncompliance and violations	44
FACILITY	6NYCRR 201-1.7	Recycling and Salvage	10
FACILITY	6NYCRR 201-1.8	Prohibition of reintroduction of collected contaminants to the air	21
FACILITY	6NYCRR 201-3.2(a)	Exempt Activities - Proof of eligibility	11
FACILITY	6NYCRR 201-3.3(a)	Trivial Activities - proof of eligibility	12
FACILITY	6NYCRR 201-6	Title V Permits and the Associated Permit	22, 26, 27

New York State Department of Environmental Conservation



Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006

		Conditions	
FACILITY	6NYCRR 201-6.5(a)(4)	General conditions	13
FACILITY	6NYCRR 201-6.5(a)(7)	General conditions	
Fees 2			
FACILITY	6NYCRR 201-6.5(a)(8)	General conditions	14
FACILITY	6NYCRR 201-6.5(c)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	3
FACILITY	6NYCRR 201-6.5(c)(2)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	4
FACILITY	6NYCRR 201-6.5(c)(3)(ii)	Permit conditions for Recordkeeping and Reporting of Compliance Monitoring	5
FACILITY	6NYCRR 201-6.5(d)(5)	Compliance schedules	15
FACILITY	6NYCRR 201-6.5(e)	Compliance Certification	23
FACILITY	6NYCRR 201-6.5(f)(6)	Off Permit Changes	16
FACILITY	6NYCRR 202-1.1	Required emissions tests.	17
FACILITY	6NYCRR 202-2.1	Emission Statements - Applicability	6
FACILITY	6NYCRR 202-2.5	Emission Statements - record keeping requirements.	7
FACILITY	6NYCRR 211.2	General Prohibitions - air pollution prohibited.	45
FACILITY	6NYCRR 211.3	General Prohibitions - visible emissions limited	18
U-PAPER	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	33
U-PAPER/-/0CC	6NYCRR 212.4(a)	General Process Emission Sources - emissions from new sources and/or modifications	35, 36
U-PAPER/-/00C	6NYCRR 212.6(a)	General Process Emission Sources - opacity of emissions limited	34
FACILITY	6NYCRR 215	Open Fires	8
U-BOILR/00008	6NYCRR 227.2(b)(1)	Particulate emissions.	31
U-BOILR	6NYCRR 227-1.3(a)	Smoke Emission Limitations.	28
FACILITY	6NYCRR 228.10	Handling, storage and disposal of VOCs	24
U-PAPER/-/0CC	6NYCRR 228.4	Opacity	37
U-PAPER/-/0CC	6NYCRR 228.5(a)	VOC recordkeeping by the facility	38
U-PAPER/-/0CC	6NYCRR 228.7	Table 1	39

Applicability Discussion:

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

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.6

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

6NYCRR Part 200-.7

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

6NYCRR Part 201-1.4

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

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6NYCRR Part 201-3.2(a)

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

6NYCRR Part 201-3.3(a)

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

pollution control requirements, regulations, or law.

6NYCRR Part 201-6

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

6NYCRR 201-6.5(a)(4)

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

6NYCRR 201-6.5(a)(7)

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

6NYCRR 201-6.5(a)(8)

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

6NYCRR Part 201-6.5(c)

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

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

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of

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

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

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

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

6NYCRR 201-6.5(d)(5)

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

6NYCRR Part 201-6.5(e)

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

6NYCRR 201-6.5(f)(6)

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

6NYCRR Part 202-1.1

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

6NYCRR Part 202-2.1

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

6NYCRR Part 202-2.5

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

6NYCRR Part 211-.2

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

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

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

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

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

40 CFR Part 82, Subpart F

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

Facility Specific Requirements

In addition to Title V, HOLLINGSWORTH & VOSE GREENWICH MILL has been determined to be subject to the following regulations:

40CFR 60-Dc.42c (d)

This regulation requires that on or after the date on which the initial performance test is completed or required to be completed under section 60.8 of 40 CFR 60 Subpart A, no owner or operator of an affected facility that combusts oil, shall combust oil with a sulfur content in excess of 0.5 percent by weight. Compliance with this permit condition also assures compliance with the 1.5 % sulfur limit specified in 6CNYRR Part 225.

40CFR 60-Dc.48c (e) (11)

If fuel supplier certifications are used to demonstrate compliance with the distillate oil specifications under 40 CFR 60-Dc.41c, then reports shall include a certified statement signed by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

40CFR 60-Dc.48c (g)

The owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each day.

40CFR 63-JJJJ.3370 (b)

This rule specifies owner/operator demonstrating compliance by using as-purchased compliant coating materials must comply by using coating materials that individually meet the standards in Sections 63.3320(b)(2) or (3). The owner/operator must demonstrate that each coating material applied during the month at an existing affected source contains no more than .2 kg organic HAP per kg coating solids on an as-purchased basis.

40CFR 63-JJJJ.3400 (c)

Owner/operator of affected sources must submit semiannual compliance reports in accordance with requirements contained within this section.

40CFR 63-JJJJ.3410 (a)

This subpart requires owner or operator of affected sources to maintain records needed to demonstrate compliance with this standard. The owner or operator has provided initial notification of applicability. The compliance date for existing sources in this subpart is December 5, 2005.

6NYCRR 212 .4 (a)

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

6NYCRR 212 .6 (a)

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

6NYCRR 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.

6NYCRR 227-1.3 (a)

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

6NYCRR 228 .10

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

6NYCRR 228 .4

This citation prohibits any person from emitting (or to allow emissions) to the outdoor atmosphere having an average opacity of 20 percent or greater for any consecutive six-minute period from any emission

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1



11/01/2006

source subject to this Part.

6NYCRR 228 .5 (a)

This citation requires the owner or operator of any emission source subject to 6 NYCRR Part 228 to maintain and, upon request, provide the Department with a certification from the coating supplier/manufacturer which verifies the parameters used to determine the actual volatile organic compound (VOC) content of each as applied coating. In addition it requires the purchase, usage and/or production records of the coating material, including solvents and any additional information required to determine compliance with Part 228 , to be maintained in a format acceptable to the Department; and upon request, submitted to the Department.

6NYCRR 228 .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.

Compliance Certification

Summary of monitoring activities at HOLLINGSWORTH & VOSE GREENWICH MILL:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
FACILITY	work practice involving specific operations	25
U-BOILR	record keeping/maintenance procedures	29
U-BOILR	record keeping/maintenance procedures	30
U-PAPER/-/OCC	work practice involving specific operations	40
U-PAPER/-/OCC	record keeping/maintenance procedures	41
U-PAPER/-/OCC	record keeping/maintenance procedures	42
U-PAPER	work practice involving specific operations	32
FACILITY	record keeping/maintenance procedures	5
FACILITY	record keeping/maintenance procedures	23
FACILITY	record keeping/maintenance procedures	6
U-PAPER/-/OCC	work practice involving specific operations	35
U-PAPER/-/OCC	intermittent emission testing	36
U-PAPER/-/OCC	monitoring of process or control device parameters as surrogate	34
U-BOILR/00008	intermittent emission testing	31
U-BOILR	monitoring of process or control device parameters as surrogate	28
FACILITY	record keeping/maintenance procedures	24
U-PAPER/-/OCC	monitoring of process or control device parameters as surrogate	37
U-PAPER/-/OCC	record keeping/maintenance procedures	38
U-PAPER/-/OCC	work practice involving specific operations	39

Basis for Monitoring

Daily check of visible emissions for process sources, subject to 6NYCRR Part 212, at the facility will

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006



help ensure that the 20% opacity limit is being met. In addition, this requirement should help to alert the source owner to unusual process conditions that might result in excess emissions if left unchecked. This also serves as a surrogate for compliance with the 0.05 grains per dry standard cubic foot limit from 6NYCRR 212.4(c).

Opacity from the boiler stack is limited to 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. Compliance with this limit will be demonstrated through daily observations of the boiler stack. These daily observation for visible emissions should alert the operator of any unusual conditions which may result in excess emission if left unchecked.

Opacity from stacks associated with the coating lines subject to Part 228 are limited to less than 20% opacity. Compliance with this limit will be demonstrated through daily observations of visible emissions from these exhausts.

Emissions of 1,3-dichloro-2 propanol is limited to 520 lbs during any 12 consecutive months. The purpose of this limit is to assure 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.

Emissions of formaldehyde is limited to no more than 0.8 pounds per hour. The purpose of this limit is to ensure the facility's potential hourly ambient impacts from this contaminant are held below acceptable levels. Compliance with this limit is achieved through formulation of coating/binders such that the maximum hourly emission rate from this process is less than 0.8 pounds per hour. Production records and formulations will be maintained for the purpose of demonstrating compliance with this limit. In addition, verification through stack testing is required once per permit term.

Control of VOCs specific to handling, storage, and disposal ensures that VOC emissions from ancillary sources are controlled. Daily observations for proper storage, handling and disposal practices will be conducted and documented. This should promote an awareness that it is necessary to control these VOC emissions at all times.

Coating VOCs, as applied, are limited to 2.9 pound of VOCs per gallon of coating (minus water and excluded VOCs). Paper coating lines are subject to this limitation in accordance with 6NYCRR 228.6, Table 1. Compliance with this limitation will be determined prior to using each coating, as applied at the facility based on certification from their supplier or manufacturer. Purchase, usage and/or production records for coating materials must also be maintained for further verification, if necessary.

The facility owns and operates a dual fuel (No. 6 & propane) fired 25 mmBtu Hurst boiler which is subject to 40 CFR 60, New Source Performance Standards (NSPS), Subpart Dc. This Subpart requires fuel certifications indicating sulfur content of the fuel oil and prohibits the combustion of fuel oil with more than .5% sulfur content of by weight. The main purpose of this is to mitigate emissions of sulfur dioxide and particulate matter when burning residual oil. A comparison to the limit will be made on a per delivery basis. This limitation also makes the facility minor for Prevention of Significant Deterioration (PSD) applicability.

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 5-5334-00006/00035 Renewal Number: 1

11/01/2006



Owner/operator of 40 CFR 60 Subpart Dc boilers between 10mmBtu but and 100 mmBtu are required to maintain records of the fuel combusted daily.

On a semiannual basis the owner or operator shall submit records of fuel supplier certifications and a signed statement that the records submitted represents all the fuel combusted during the reporting period. Given this certification, a comparison to the .5 % by weight sulfur content limit can be made for all the oil combusted during the given period.

6NYCRR Part 227.2 requires oil fired stationary combustion installations comply with a 0.1 pounds per million Btu particulate matter emission limit. The 25 mmBtu Hurst boiler will be stack tested once per permit term to demonstrate compliance with this limit. In addition, visible emissions from the boiler are monitored daily which also serve as surrogate for compliance with the particulate matter limit.

This facility owns or operates an affected source subject to 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for Paper and Other Web Coating . 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-purchased, to no more than 0.2 kg orgnaic HAP per kg coating solids. This will be demonstrated through maintenance of monthly records.