



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 2-6403-00107/00017
Mod 0 Effective Date: 12/18/2017 Expiration Date: 12/17/2027
Mod 1 Effective Date: 11/06/2018 Expiration Date: 12/17/2027

Permit Issued To: PRATT PAPER (NY) INC
4435 VICTORY BLVD
STATEN ISLAND, NY 10314

Contact: MUNEER AHMAD
PRATT PAPER (NY), INC.
4435 VICTORY BLVD
STATEN ISLAND, NY 10314
(718) 370-1114

Facility: PRATT PAPER (NY), INC
4435 VICTORY BLVD
STATEN ISLAND, NY 10314

Contact: TIMOTHY R. TARANTINO
PRATT PAPER (NY), INC
4435 VICTORY BLVD
STATEN ISLAND, NY 10314
(718) 355-6717

Description:
Pratt Paper (NY), Inc. is a state-of-the-art waste paper recycling facility. The facility consists of an existing paper machine that processes pulp into sheets of paper and includes the application of various dyes, one existing 249 MMbtu/hr. boiler firing natural gas, and three existing 14 MMbtu/hr. natural gas fired space heaters.

The facility is limiting its NO_x and HAP emissions to less than the major threshold and is capping out of the applicable requirements, 6NYCRR Subpart 201-6, 6NYCRR Subpart 227-2 for NO_x and NESHAPS for HAPS and is required to have a State Facility Permit under 6NYCRR Subpart 201-5. In addition, the facility is subject to 6NYCRR Part 212 for non-criteria contaminants.

New York State Department of Environmental Conservation
Facility DEC ID: 2640300107



By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator: STEPHEN A WATTS
 47-40 21ST ST
 LONG ISLAND CITY, NY 11101-5401

Authorized Signature: _____ Date: ___ / ___ / _____



Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

- Submission of application for permit modification or renewal -

REGION 2 HEADQUARTERS



DEC GENERAL CONDITIONS
****** General Provisions ******
GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

Condition 2: Relationship of this Permit to Other Department Orders and Determinations

Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.



Condition 4: Permit modifications, suspensions or revocations by the Department
Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator
Region 2 Headquarters
Division of Environmental Permits
1 Hunters Point Plaza, 4740 21st Street
Long Island City, NY 11101-5407
(718) 482-4997

New York State Department of Environmental Conservation

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107



Permit Under the Environmental Conservation Law (ECL)

**ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY
PERMIT**

IDENTIFICATION INFORMATION

Permit Issued To: PRATT PAPER (NY) INC
4435 VICTORY BLVD
STATEN ISLAND, NY 10314

Facility: PRATT PAPER (NY), INC
4435 VICTORY BLVD
STATEN ISLAND, NY 10314

Authorized Activity By Standard Industrial Classification Code:
2631 - PAPERBOARD MILLS
2653 - CORRUGATED AND SOLID FIBER BOX
5093 - SCRAP AND WASTE MATERIALS

Mod 0 Permit Effective Date: 12/18/2017

Permit Expiration Date: 12/17/2027

Mod 1 Permit Effective Date: 11/06/2018

Permit Expiration Date: 12/17/2027



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *1-1 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *1-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- *5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 6 6 NYCRR 211.1: Air pollution prohibited
- 7 6 NYCRR 227-1.3 (a): Compliance Demonstration

Emission Unit Level

EU=U-00003,Proc=NG2,ES=B0004

- 8 40CFR 60.44b(k), NSPS Subpart Db: Oxides of nitrogen standard exemption.

EU=U-00004

- 9 6 NYCRR 212-1.6 (a): Compliance Demonstration

EU=U-OOCOR

- 14 6 NYCRR 234.3 (a) (1) (i): Compliance Demonstration
- 15 6 NYCRR 234.6: Compliance Demonstration
- 16 6 NYCRR 234.7: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 17 ECL 19-0301: Contaminant List
- 18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 22 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level

- 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

EU=U-00004

- 25 6 NYCRR 212-2.1 (a): Compliance Demonstration
- 1-5 6 NYCRR 212-2.3 (b): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,



required to operate such device effectively.

Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

Item E: Recycling and Salvage - 6 NYCRR 201-1.7

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

Item I: Required Emission Tests - 6 NYCRR 202-1.1

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 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.

Item K: 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 L: 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.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

per year	CAS No: 0NY100-00-0 (From Mod 1)	PTE: 45,000 pounds
	Name: TOTAL HAP	
per year	CAS No: 0NY210-00-0 (From Mod 1)	PTE: 45,000 pounds
	Name: OXIDES OF NITROGEN	
per year	CAS No: 0NY998-00-0 (From Mod 1)	PTE: 49,000 pounds
	Name: VOC	

Condition 1-1: Capping Monitoring Condition
Effective between the dates of 11/06/2018 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-1.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart S



Item 1-1.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-1.3:

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.

Item 1-1.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-1.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-1.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 1-1.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide of any single Hazardous Air Pollutant (HAP) emissions shall be limited to 9.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide single HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

New York State Department of Environmental Conservation

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Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 1-2: Capping Monitoring Condition
Effective between the dates of 11/06/2018 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR 231-2.2

Item 1-2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-2.3:

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.

Item 1-2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 1-2.7:

New York State Department of Environmental Conservation

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107



Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The total facility-wide emissions of Volatile Organic Compounds (VOC) shall be limited to 24.5 tons per year for any consecutive 12-month period.

The facility must maintain records in a format acceptable to the Department that verify the facility's VOC emission.

Upon request, these records must be submitted to the Department.

Records to verify compliance with the permit limit shall be maintained at the facility, which shall include monthly recycled paper production and quantity of VOC containing materials used, and the VOC content of the VOC containing materials and shall calculate the facility wide VOC emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2019.

Subsequent reports are due every 12 calendar month(s).

Condition 2: Capping Monitoring Condition
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

6 NYCRR Subpart 227-2

Item 2.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2.3:



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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.

Item 2.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 2.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual NOx emissions shall be limited to 22.5 tpy for any consecutive 12-month period. Pratt Paper (NY), Inc. shall calculate the facility wide NOx emissions utilizing the fuel consumption and emission factors acceptable to the Department and calculate on a monthly and total 12 month rolling NOx emissions.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 1-3: Capping Monitoring Condition
Effective between the dates of 11/06/2018 and 12/17/2027



Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

6 NYCRR Subpart 227-2

Item 1-3.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-3.3:

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.

Item 1-3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 1-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual NOx emissions shall be limited to 22.5 tpy for any consecutive 12-month period. Pratt Paper (NY), Inc. shall calculate the facility wide NOx emissions utilizing the fuel consumption and emission factors acceptable to the Department and calculate on a



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monthly and total 12 month rolling NOx emissions.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 3: Capping Monitoring Condition
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 3.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
6 NYCRR 231-2.2

Item 3.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 3.3:

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.

Item 3.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3.6:



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The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The total facility-wide emissions of Volatile Organic Compounds (VOC) shall be limited to 24.5 tons per year for any consecutive 12-month period.

The facility must maintain records in a format acceptable to the Department that verify the facility's VOC emission. Upon request, these records must be submitted to the Department.

Records to verify compliance with the permit limit shall be maintained at the facility, which shall include monthly recycled paper production and quantity of VOC containing materials used, and the VOC content of the VOC containing materials and shall calculate the facility wide VOC emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 1-4: Capping Monitoring Condition
Effective between the dates of 11/06/2018 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1-4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart S

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Item 1-4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 1-4.3:

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.

Item 1-4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 1-4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 1-4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 1-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual Hazardous Air Pollutants (HAP) emissions shall be limited to 22.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide total HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions



calculations.

Monitoring Frequency: MONTHLY
Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2019.
Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 4.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6
40 CFR Part 63, Subpart S

Item 4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 4.3:

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.

Item 4.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):
CAS No: 0NY100-00-0 TOTAL HAP



Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual Hazardous Air Pollutants (HAP) emissions shall be limited to 22.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide total HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 5: Capping Monitoring Condition
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart S

Item 5.2:

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 5.3:

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,

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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.

Item 5.4:

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 5.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide of any single Hazardous Air Pollutant (HAP) emissions shall be limited to 9.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide single HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 6: Air pollution prohibited



Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR 211.1

Item 6.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 7: Compliance Demonstration

Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR 227-1.3 (a)

Item 7.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. In addition, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test

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indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Monitoring Frequency: ANNUALLY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

****** Emission Unit Level ******

Condition 8: Oxides of nitrogen standard exemption.
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:40CFR 60.44b(k), NSPS Subpart Db

Item 8.1:

This Condition applies to Emission Unit: U-00003
Process: NG2 Emission Source: B0004

Item 8.2:

Affected facilities which meet the criteria in paragraphs (j)(1), (j)(2), and (j)(3) and are less than or equal to 73 MW in heat input capacity are exempt from the oxides of nitrogen standards of section 40 CFR 60-Db.44b(k).

Condition 9: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR 212-1.6 (a)

Item 9.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Item 9.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement: 6 NYCRR 234.3 (a) (1) (i)

Item 14.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

A packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses an ink, coating or adhesive with a low VOC content equal to or less than 0.8 kilograms of VOC per kilogram of solids as applied (0.8 kg VOC/ kg solids as applied).

VOC content limits can be met by averaging the VOC content of materials used on a single press (i.e., within a

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line).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 0.8 kilograms VOC per kilogram
solids applied

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement:6 NYCRR 234.6

Item 15.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):
CAS No: 0NY998-00-0 VOC

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

An owner or operator of a facility subject to this Part shall not:

(a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;

(c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

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Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable Federal Requirement: 6 NYCRR 234.7

Item 16.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the Department, and upon request, submitted to the Department. Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY





STATE ONLY ENFORCEABLE CONDITIONS
****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS
This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: **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.

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 17: Contaminant List
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:ECL 19-0301

Item 17.1:

Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 0NY100-00-0
Name: TOTAL HAP

CAS No: 0NY210-00-0
Name: OXIDES OF NITROGEN

CAS No: 0NY998-00-0
Name: VOC

Condition 18: Malfunctions and start-up/shutdown activities



Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR 201-1.4

Item 18.1:

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Condition 19: Emission Unit Definition

Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00003

Emission Unit Description:

New Rentech Boiler with maximum heat input of 249

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MMbtu/hr., replacing former Nebraska boiler (248
MMbtu/hr.).

Building(s): MAIN

Item 19.2(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00004

Emission Unit Description:

Paper machine where pulp is processed into sheets of paper. The process includes the application of various dyes and chemicals.

Building(s): MAIN

Item 19.3(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00007

Emission Unit Description:

Three 14 MMbtu/hr. natural gas fired space heaters.

Building(s): MAIN

Item 19.4(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00010

Emission Unit Description:

One 500 HP natural gas fired boiler.

Building(s): MAIN

Item 19.5(From Mod 1):

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-OOCOR

Emission Unit Description:

This emission unit is for the corrugating operation, which includes the corrugator where paper is transformed into corrugated sheets, and the flexographic operation, which converts corrugated sheets into boxes, including flexographic printing (using water based inks). The corrugated sheet is made from paper (liner and medium), steam, corn starch (glue/adhesive), and various chemicals used in the starch making. The starch is stored and kept in a storage silo. The corrugating operation generates some waste (paper trimmings and side trimming). The paper waste/trimmings are collected through a pneumatic system and carried through an in-clone system and filter designed to achieve 99.99% particulate removal. The waste then goes to the bailer for recycling. This process includes cornstarch, water based flexographic inks, and water based glues. VOC/HAP emissions are exhausted through a roof vent. Particulate emissions from the in-clone are

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released as fugitives from the building.

Building(s): MAIN

Condition 20: Renewal deadlines for state facility permits
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR 201-5.2 (c)

Item 20.1:

The owner or operator of a facility having an issued state facility 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.

Condition 21: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR 201-5.3 (c)

Item 21.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 21.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 2
47-40 21st St.
Long Island City, NY 11101

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

Condition 22: Visible Emissions Limited
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR 211.2

Item 22.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted

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burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

****** Emission Unit Level ******

Condition 23: Emission Point Definition By Emission Unit
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00003

Emission Point: B0004

Height (ft.): 130

Diameter (in.): 66

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Item 23.2(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00004

Emission Point: 00004

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Emission Point: 100I4

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Emission Point: 200I4

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Emission Point: 300I4

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Emission Point: 400I4

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Emission Point: 500I4

Height (ft.): 73

Diameter (in.): 51

NYTMN (km.): 4493.5

NYTME (km.): 567.5

Building: MAIN

Item 23.3(From Mod 1):

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The following emission points are included in this permit for the cited Emission Unit:

- Emission Unit: U-00007
 - Emission Point: 00007
 - Height (ft.): 76 Length (in.): 4 Width (in.): 4
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: 00008
 - Height (ft.): 76 Length (in.): 4 Width (in.): 4
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: 00009
 - Height (ft.): 65 Length (in.): 4 Width (in.): 4
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: 0007A
 - Height (ft.): 40 Diameter (in.): 14
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: 0007B
 - Height (ft.): 41 Diameter (in.): 14
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: 0007C
 - Height (ft.): 47 Diameter (in.): 14
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Item 23.4(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

- Emission Unit: U-00010
 - Emission Point: 00010
 - Height (ft.): 70 Diameter (in.): 24
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Item 23.5(From Mod 1):

The following emission points are included in this permit for the cited Emission Unit:

- Emission Unit: U-OOCOR
 - Emission Point: OOCOR
 - Height (ft.): 36 Length (in.): 6 Width (in.): 6
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN
 - Emission Point: OSILO
 - Height (ft.): 41 Diameter (in.): 12
 - NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Condition 24: Process Definition By Emission Unit
Effective between the dates of 12/18/2017 and 12/17/2027



Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00003
Process: NG2 Source Classification Code: 1-03-006-01
Process Description: Firing Natural Gas in 249 mmbtu/hr new boiler.

Emission Source/Control: B0004 - Combustion
Design Capacity: 249 million Btu per hour

Emission Source/Control: B0005 - Control
Control Type: LOW NOx BURNER

Item 24.2(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00004
Process: 004 Source Classification Code: 3-07-888-01

Emission Source/Control: 00004 - Process

Item 24.3(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00007
Process: 007 Source Classification Code: 1-05-001-06

Emission Source/Control: 00007 - Combustion

Emission Source/Control: 00008 - Combustion

Emission Source/Control: 00009 - Combustion

Item 24.4(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00010
Process: GAS Source Classification Code: 1-03-006-02

Emission Source/Control: OOBLR - Combustion
Design Capacity: 500 horsepower (boiler)

Item 24.5(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-OOCOR
Process: COR Source Classification Code: 4-05-003-01
Process Description:

The corrugator will transform rolls of paper into



corrugated sheets for use by the flexographic operation for making corrugated boxes and to outside customers. The corrugated sheets are produced from the paper received from the paper machine. At the beginning of the process, paper rolls are loaded on the corrugator at the unwind end of the machine. The paper travels over a heated drum with steam showers to condition the paper, to be formed into the desired flute by corrugating rolls. As the paper comes out of the corrugating roll, it passes over a glue roll that applies cornstarch as an adhesive on the tips of the flutes, then the top liner is applied to the paper. The web then travels on top of the bridge and comes down through a double backer where starch is applied to the other side of the paper, then the bottom liner is put on the sheet. The board is now traveling through a hot plate section. The hot plates heat sets the starch and the board is bonded when exiting the hot plate section. The board then goes through the slitter scorer where the board is custom cut and scored. Then the board goes into the cut off knife and is cut to the correct length. Finished corrugated sheets are either moved to the flexographic operation to make boxes or sent to off-site customers. The flexographic operation converts corrugated sheets into boxes. The corrugated sheet is placed in the machine and pulled through the print stations where one ink color at a time is applied. Then, depending on the type of box, the corrugated sheet is either die cut or slotted, and scored. Some of the machines can also glue the boxes together (using water based glue). At that point the finished box travels on the stacker to be stacked, sent down to the bander line to be added, and is shipped out to the customer. The entire flexographic operation is composed of water based inks and water based glues. The corrugating and flexographic (converting) process is process COR.

Emission Source/Control: INCLO - Control
Control Type: FABRIC FILTER

Emission Source/Control: SFILT - Control
Control Type: FABRIC FILTER

Emission Source/Control: CORRU - Process

Emission Source/Control: OSILO - Process

Item 24.6(From Mod 1):

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-OOCOR
Process: FLE Source Classification Code: 4-05-003-01
Process Description: Flexographic printing with water based inks.



Emission Source/Control: FLEXO - Process

Condition 25: Compliance Demonstration
Effective between the dates of 12/18/2017 and 12/17/2027

Applicable State Requirement:6 NYCRR 212-2.1 (a)

Item 25.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Item 25.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants.

For an HTAC assigned an Environmental Rating of A and has an Emission Rate Potential (ERP) of less than 0.1 pound per hour and annual mass emissions of a persistent and bioaccumulative compound less than the PB Trigger, the owner or operator is required to meet the short term and annual guideline concentration at the fence line of the facility.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 1-5: Compliance Demonstration
Effective between the dates of 11/06/2018 and 12/17/2027

Applicable State Requirement:6 NYCRR 212-2.3 (b)

Item 1-5.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

Item 1-5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

New York State Department of Environmental Conservation

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107



Monitoring Description:

Speciated VOC contaminants:
lbs/hr lbs/yr GC Ca
Environmental

	Rating			
Light petroleum distillate (CAS# 008002-05-9)	0.25	2169	100	1.8
B				
Dipropylene glycol methyl ether (CAS# 3459-94-8)	2.14	18769	1400	7.3
B				
Triethanolamine (CAS # 00102-71-6)	1.54	13490	12	11.1
B				
2,2 - Dibromo-3-nitriopronamide ((CAS# 10222-01-2)	0.08	560	17	0.6
B				
Butyl Acrylate (CAS# 00141-32-2)	0.03	44	26	0.2
B				

Where:
lb/hr is actual emissions
AGC is Ambient Guideline Concentration, ug/cubic meter,
Ca is impact at property line in ug/cubic meter.

This analysis is conservative by assuming all emissions are discharges through one of the Emission Unit's six identical emissions points.

Facility owner or operator shall not allow emissions of the air contaminants listed above to violate the requirements specified in Subdivision 212.23(b), Table 4 - Degree of Air Cleaning Required for Non-Criteria Contaminants for the environmental rating assigned to the contaminant by the department.

The listed contaminants have been given an Environmental rating of B for the process emission sources identified above. Emissions of each contaminant with the actual emission rate as listed above have demonstrated at the property line the ambient impacts are below the Annual Guideline Concentration (AGC).

Facility must maintain records to demonstrate that none of the contaminants have had an increased actual emission rate in such a way as to contravene the AGC values. Any 1000 pounds per year increase in the actual emission rate

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Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107



of a contaminant will require a reevaluation of ambient impacts of that contaminant to demonstrate ambient impacts are below the AGC at the fence line of the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY