

**New York State Department of Environmental Conservation  
Facility DEC ID: 4010300015**



**PERMIT  
Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
4-0103-00015/00015  
Effective Date: 01/13/2003      Expiration Date: No expiration date

Permit Issued To: MOHAWK PAPER MILLS INC  
465 SARATOGA ST  
COHOES, NY 12047-4626

Facility: MOHAWK PAPER MILLS  
465 SARATOGA ST  
COHOES, NY 12047

Contact: GEORGE W MILNER  
MOHAWK PAPER MILLS  
P. O. BOX 497  
COHOES, NY 12047  
(518) 237-1740

Description:

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: MICHAEL T HIGGINS  
DIVISION OF ENVIRONMENTAL PERMITS  
1150 NORTH WESTCOTT RD  
SCHENECTADY, NY 12306-2014

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 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 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 and Modifications

Permit Modifications, Suspensions and Revocations by the Department

**Facility Level**

Submission of Applications for Permit Modification or Renewal -REGION 4  
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 and Modifications**  
**Applicable State Requirement: 6NYCRR 621.13**

**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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for 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

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transfer of ownership.

**Condition 4: Permit Modifications, Suspensions and Revocations by the Department**  
**Applicable State Requirement: 6NYCRR 621.14**

**Item 4.1:**

The Department reserves the right 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 Applications for Permit Modification or Renewal -REGION 4**  
**HEADQUARTERS**  
**Applicable Stat6NYCRR 621.5(a)**

**Item 5.1:**

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

NYSDEC Regional Permit Administrator  
Region 4 Headquarters  
Division of Environmental Permits  
1150 North Westcott Rd.  
Schenectady, NY 12306-2014  
(518) 357-2069



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**Permit Under the Environmental Conservation Law (ECL)**

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

**IDENTIFICATION INFORMATION**

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465 SARATOGA ST  
COHOES, NY 12047-4626

MOHAWK PAPER MILLS

465 SARATOGA ST  
COHOES, NY 12047

Authorized Activity By Standard Industrial Classification Code:  
2621 - PAPER MILLS EXC BUILDING PAPER

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**LIST OF CONDITIONS**

**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 1 6NYCRR 201-6: Facility Permissible Emissions
- 2 6NYCRR 201-6.5(g): Non Applicable requirements
- 3 6NYCRR 228.5(h): Compliance Demonstration

**Emission Unit Level**

- 4 6NYCRR 201-6: Emission Unit Permissible Emissions
- 5 6NYCRR 201-6: Process Permissible Emissions

**EU=C-NYC01**

- 6 6NYCRR 212.4(c): Compliance Demonstration
- 7 6NYCRR 212.6(a): Compliance Demonstration

**EU=P-NYC01,EP=CBN01**

- 8 6NYCRR 227-1.3(a): Compliance Demonstration

**EU=P-NYC01,EP=CBN01,Proc=C01**

- \*9 6NYCRR 201-6: Compliance Demonstration

**EU=P-NYC01,EP=CBN01,Proc=C02**

- \*10 6NYCRR 201-6: Compliance Demonstration
- \*11 6NYCRR 201-6: Compliance Demonstration
- 12 6NYCRR 227-1.3: Compliance Demonstration

**EU=P-NYC02**

- 13 6NYCRR 212.4(a): Emissions from new emission sources and/or modifications
- 14 6NYCRR 212.6(a): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 15 ECL 19-0301: Contaminant List
- 16 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 17 6NYCRR 201-5: Emission Unit Definition
- 18 6NYCRR 211.2: Air pollution prohibited

**Emission Unit Level**

- 19 6NYCRR 201-5: Emission Point Definition By Emission Unit
- 20 6NYCRR 201-5: Process Definition By Emission Unit

NOTE: \* preceding the condition number indicates capping.

Permit Effective Date: 01/13/2003

Permit Expiration Date: No expiration date.



**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 - 6NYCRR Part 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 - 6NYCRR Part 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 - 6NYCRR Part 200.7**

Any person who owns or operates an air contamination



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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 - 6NYCRR Part 201-1.2**

If an existing emission source was subject to the permitting requirements of 6NYCRR 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: 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 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 F:                    Recycling and Salvage - 6NYCRR Part 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 G:                    Prohibition of Reintroduction of Collected Contaminants to the Air - 6NYCRR Part 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 H:                    Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR Part 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 I:                    Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR Part 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



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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 J: Required Emission Tests - 6 NYCRR Part 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 6NYCRR Part 202-1.

**Item K: Visible Emissions Limited - 6 NYCRR Part 211.3**

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

**Item L: Open Fires - 6 NYCRR Part 215**

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**Item M: 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



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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 N: 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 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**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:

CAS No: 000050-00-0                      PTE: 19,000 pounds per year  
Name: FORMALDEHYDE

CAS No: 000067-56-1                      PTE: 19,000 pounds per year  
Name: METHYL ALCOHOL

CAS No: 000075-07-0                      PTE: 19,000 pounds per year  
Name: ACETALDEHYDE

CAS No: 000075-09-2                      PTE: 19,000 pounds per year  
Name: DICHLOROMETHANE



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CAS No: 000078-93-3 Name: METHYL ETHYL KETONE	PTE: 19,000 pounds per year
CAS No: 000107-02-8 Name: ACROLEIN	PTE: 19,000 pounds per year
CAS No: 000127-18-4 Name: PERCHLOROETHYLENE	PTE: 19,000 pounds per year
CAS No: 000630-08-0 Name: CARBON MONOXIDE	PTE: 190,000 pounds per year
CAS No: 007439-92-1 Name: LEAD	PTE: 19,000 pounds per year
CAS No: 007446-09-5 Name: SULFUR DIOXIDE	PTE: 190,000 pounds per year
CAS No: 0NY075-00-5 Name: PM-10	PTE: 190,000 pounds per year
CAS No: 0NY100-00-0 Name: HAP	PTE: 47,500 pounds per year
CAS No: 0NY210-00-0 Name: OXIDES OF NITROGEN	PTE: 190,000 pounds per year
CAS No: 0NY998-00-0 Name: VOC	PTE: 95,000 pounds per year

**Condition 2: Non Applicable requirements**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6.5(g)**

**Item 2.1:**

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 227-2

Reason: The Part 201-6 cap also caps the facility out of Part 227-2.

6NYCRR 228.1(d)(3)

Reason: The 2.9 lb/gal VOC limit for paper coating lines found in Table 1 does not apply, because the VOC Potential to Emit



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(PTE) of noncombustion sources at the facility is less than 10 ton/yr.

**Condition 3: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 228.5(h)**

**Item 3.1:**

The Compliance Demonstration activity will be performed for the Facility.

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

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any facility which is not subject to the control requirements of this Part because its annual potential to emit volatile organic compounds is below the applicability criteria must maintain records in a format acceptable to the commissioner's representative that verify the facility's annual potential to emit VOCs. Upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

**Condition 4: Emission Unit Permissible Emissions**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 4.1:**

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: P-NYC01

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CAS No: 000050-00-0  
Name: FORMALDEHYDE  
PTE(s): 0.06 pounds per hour  
102 pounds per year

Emission Unit: P-NYC02

CAS No: 000050-00-0  
Name: FORMALDEHYDE  
PTE(s): 0.014 pounds per hour  
125 pounds per year

CAS No: 000067-56-1  
Name: METHYL ALCOHOL  
PTE(s): 0.253 pounds per hour  
2,216 pounds per year

CAS No: 000075-07-0  
Name: ACETALDEHYDE  
PTE(s): 0.226 pounds per hour  
1,975 pounds per year

CAS No: 000075-09-2  
Name: DICHLOROMETHANE  
PTE(s): 0.033 pounds per hour  
289 pounds per year

CAS No: 000078-93-3  
Name: METHYL ETHYL KETONE  
PTE(s): 0.011 pounds per hour  
95 pounds per year

CAS No: 000107-02-8  
Name: ACROLEIN  
PTE(s): 0.007 pounds per hour  
62 pounds per year

CAS No: 000127-18-4  
Name: PERCHLOROETHYLENE  
PTE(s): 0.009 pounds per hour  
77 pounds per year

Emission Unit: P-NYC01

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

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PTE(s): 10 pounds per hour  
84,000 pounds per year

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE  
PTE(s): 63.39 pounds per hour  
190,000 pounds per year

CAS No: 0NY075-00-5  
Name: PM-10  
PTE(s): 0.9 pounds per hour  
7,890 pounds per year

CAS No: 0NY100-00-0  
Name: HAP  
PTE(s): 0.22 pounds per hour  
1,875 pounds per year

Emission Unit: P-NYC02

CAS No: 0NY100-00-0  
Name: HAP  
PTE(s): 0.553 pounds per hour  
4,840 pounds per year

Emission Unit: P-NYC01

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN  
PTE(s): 15 pounds per hour  
116,990 pounds per year

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 2.06 pounds per hour  
17,280 pounds per year

Emission Unit: P-NYC02

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 0.886 pounds per hour  
7,760 pounds per year

**Condition 5: Process Permissible Emissions**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**



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**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 5.1:**

The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: P-NYC01 Process: C01

CAS No: 000050-00-0

Name: FORMALDEHYDE

PTE(s): 0.01 pounds per hour  
75 pounds per year

Emission Unit: P-NYC01 Process: C02

CAS No: 000050-00-0

Name: FORMALDEHYDE

PTE(s): 0.05 pounds per hour  
27 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 000050-00-0

Name: FORMALDEHYDE

PTE(s): 0.014 pounds per hour  
125 pounds per year

Emission Unit: P-NYC02 Process: D01

CAS No: 000067-56-1

Name: METHYL ALCOHOL

PTE(s): 0.088 pounds per hour  
771 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 000067-56-1

Name: METHYL ALCOHOL

PTE(s): 0.125 pounds per hour  
1,098 pounds per year

Emission Unit: P-NYC02 Process: K01

CAS No: 000067-56-1

Name: METHYL ALCOHOL

PTE(s): 0.04 pounds per hour

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347 pounds per year

Emission Unit: P-NYC02 Process: D01

CAS No: 000075-07-0

Name: ACETALDEHYDE

PTE(s): 0.07 pounds per hour  
617 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 000075-07-0

Name: ACETALDEHYDE

PTE(s): 0.155 pounds per hour  
1,359 pounds per year

Emission Unit: P-NYC02 Process: K01

CAS No: 000075-09-2

Name: DICHLOROMETHANE

PTE(s): 0.033 pounds per hour  
289 pounds per year

Emission Unit: P-NYC02 Process: D01

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

PTE(s): 0.007 pounds per hour  
61 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 000078-93-3

Name: METHYL ETHYL KETONE

PTE(s): 0.004 pounds per hour  
35 pounds per year

Emission Unit: P-NYC02 Process: D01

CAS No: 000107-02-8

Name: ACROLEIN

PTE(s): 0.004 pounds per hour  
35 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 000107-02-8

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Name: ACROLEIN

PTE(s): 0.003 pounds per hour  
23 pounds per year

CAS No: 000127-18-4

Name: PERCHLOROETHYLENE

PTE(s): 0.009 pounds per hour  
77 pounds per year

Emission Unit: P-NYC01 Process: C01

CAS No: 000630-08-0

Name: CARBON MONOXIDE

PTE(s): 10 pounds per hour  
84,000 pounds per year

Emission Unit: P-NYC01 Process: C02

CAS No: 000630-08-0

Name: CARBON MONOXIDE

PTE(s): 4.46 pounds per hour  
2,250 pounds per year

Emission Unit: P-NYC01 Process: C01

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

PTE(s): 0.7 pounds per hour  
570 pounds per year

Emission Unit: P-NYC01 Process: C02

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

PTE(s): 63.39 pounds per hour  
31,950 pounds per year

Emission Unit: P-NYC01 Process: C01

CAS No: 0NY075-00-5

Name: PM-10

PTE(s): 0.9 pounds per hour  
7,600 pounds per year

Emission Unit: P-NYC01 ProcC02

CAS No: 0NY075-00-5



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Name: PM-10

PTE(s): 0.89 pounds per hour  
450 pounds per year

Emission Unit: P-NYC01 Process: C01

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 0.22 pounds per hour  
1,875 pounds per year

Emission Unit: P-NYC01 Proc:C02

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 0.05 pounds per hour  
27 pounds per year

Emission Unit: P-NYC02 Process: D01

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 0.17 pounds per hour  
1,467 pounds per year

Emission Unit: P-NYC02 Process: F01

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 0.311 pounds per hour  
2,717 pounds per year

Emission Unit: P-NYC02 Process: K01

CAS No: 0NY100-00-0

Name: HAP

PTE(s): 0.073 pounds per hour  
636 pounds per year

Emission Unit: P-NYC01 Process: C01

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

PTE(s): 12.5 pounds per hour  
105,000 pounds per year

Emission Unit: P-NYC01 Process: C02

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CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN  
PTE(s): 15 pounds per hour  
7,560 pounds per year

Emission Unit: P-NYC01                      Process: C01

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 2.06 pounds per hour  
17,280 pounds per year

Emission Unit: P-NYC01                      ProcC02

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 0.23 pounds per hour  
117 pounds per year

Emission Unit: P-NYC02                      Process: D01

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 0.28 pounds per hour  
2,450 pounds per year

Emission Unit: P-NYC02                      Process: F01

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 0.463 pounds per hour  
4,057 pounds per year

Emission Unit: P-NYC02                      Process: K01

CAS No: 0NY998-00-0  
Name: VOC  
PTE(s): 0.143 pounds per hour  
1,253 pounds per year

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(c)**

**Item 6.1:**

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The Compliance Demonstration activity will be performed for:

Emission Unit: C-NYC01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

In instances where determination of permissible emission rate using process weight is not applicable, and for an environmental rating of B or C, no person will cause or allow emissions of solid particulates that exceed 0.050 grains of particulate per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 7: Compliance Demonstration**

**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 7.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: C-NYC01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:



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No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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 8: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Fe6NYCRR 227-1.3(a)**

**Item 8.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYC01 Emission Point: CBN01

**Item 8.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a combustion installation shall emit greater than 20 percent opacity except for one six minute period per hour, not to exceed 27 percent, based upon the six minute average in reference test method 9 in Appendix A of 40 CFR 60.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**



**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYC01    Emission Point: CBN01  
Process: C01

Regulated Contaminant(s):

CAS No: 000050-00-0    FORMALDEHYDE  
CAS No: 000067-56-1    METHYL ALCOHOL  
CAS No: 000075-07-0    ACETALDEHYDE  
C/DICHLOROMETHANE  
CAS No: 000078-93-3    METHYL ETHYL KETONE  
CAS No: 000107-02-8    ACROLEIN  
CAS No: 000127-18-4    PERCHLOROETHYLENE  
CAS No: 000630-08-0    CARBON MONOXIDE  
CAS No: 007439-92-1    LEAD  
CAS No: 0NY075-0PM-10  
CAS No: 0NY210-00-0    OXIDES OF NITROGEN  
CAS No: 0NY998-00-0    VOC  
CAS No: 0NY100-00-0    HAP  
CAS No: 007446-09-5    SULFUR DIOXIDE

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The volume of fuel burned limited to keep criteria and individual and total hazardous air pollutant emissions less than the applicability threshold of 6 NYCRR 201-6, capping the facility out of that requirement.

The following emission factors were used in the above determination:

SO<sub>2</sub>: 0.6 lb/mm cf, NO<sub>X</sub>: 100 lb/mm cf; CO: 84 lb/mm cf

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NATURAL GAS

Upper Permit Limit: 1000 million cubic feet per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)





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Reports due 30 days after the reporting period.  
The initial report is due 1/30/2004.  
Subsequent reports are due every 12 calendar month(s).

**Condition 10: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 10.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYC01 Emission Point: CBN01  
Process: C02

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE  
CAS No: 000067-56-1 METHYL ALCOHOL  
CAS No: 000075-07-0 ACETALDEHYDE  
C/DICHLOROMETHANE  
CAS No: 000078-93-3 METHYL ETHYL KETONE  
CAS No: 000107-02-8 ACROLEIN  
CAS No: 000127-18-4 PERCHLOROETHYLENE  
CAS No: 000630-08-0 CARBON MONOXIDE  
CAS No: 007439-92-1 LEAD  
CAS No: 0NY075-0PM-10  
CAS No: 0NY210-00-0 OXIDES OF NITROGEN  
CAS No: 0NY998-00-0 VOC  
CAS No: 0NY100-00-0 HAP  
CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 10.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes  
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC  
OPERATIONS

Monitoring Description:

The volume of fuel burned limited to keep criteria and individual and total hazardous air pollutant emissions less than the applicability threshold of 6 NYCRR 201-6, capping the facility out of that requirement.

The following emission factors were used in the above determination:

SO<sub>2</sub>: 71 lb/1000 gal, NO<sub>X</sub>: 20 lb/1000 gal, CO: 5 lb/1000 gal

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Work Practice Type: PROCESS MATERIAL THRUPUT  
Process Material: NUMBER 2 OIL  
Upper Permit Limit: 2675000 gallons  
Monitoring Frequency: MONTHLY  
Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2004.  
Subsequent reports are due every 12 calendar month(s).

**Condition 11: Compliance Demonstration**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 201-6**

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYC01 Emission Point: CBN01  
Process: C02

Regulated Contaminant(s):  
CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes  
Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS  
Monitoring Description:  
The Part 201-6 cap is based on firing 0.5% sulfur oil.  
With the annual cap report, the facility shall submit a fuel supplier certification for each supplier.

Work Practice Type: PARAMETER OF PROCESS MATERIAL  
Process Material: NUMBER 2 OIL  
Parameter Monitored: SULFUR CONTENT  
Upper Permit Limit: .5 percent by weight  
Monitoring Frequency: SINGLE OCCURRENCE  
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE -  
SEE MONITORING DESCRIPTION  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2004.  
Subsequent reports are due every 12 calendar month(s).

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**Condition 12: Compliance Demonstration**

**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal/State Regulations: 6 NYCRR 227-1.3**

**Item 12.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYC01 Emission Point: CBN01  
Process: C02

**Item 12.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Operators of oil-fired boilers which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

1) Observe the stack for each boiler which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each

stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days

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of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**\*\* NOTE \*\*** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 13: Emissions from new emission sources and/or modifications  
Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.4(a)**

**Item 13.1:**

This Condition applies to Emission Unit: P-NYC02

**Item 13.2:**

No person shall cause or allow emissions that exceed the applicable permissible emission rate as determined from Table 2, Table 3, or Table 4 of 6 NYCRR Part 212 for the environmental rating issued by the commissioner.

**Condition 14: Compliance Demonstration  
Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable Federal Requirement: 6NYCRR 212.6(a)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

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Emission Unit: P-NYC02

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

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



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

Where emission source owners and/or operators keep records pursuant to compliance with the operational flexibility requirements of 6 NYCRR Subpart 201-5.4(b)(1) , and/or the emission capping requirements of 6 NYCRR Subparts 201-7.2(d), 201-7.3(f), 201-7.3(g), 201-7.3(h)(5), 201-7.3(i) and 201-7.3(j), the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records. Emission source owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department of receipt of the request.

**Item B: 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

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law.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 15: Contaminant List**

**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable State ReqECL 19-0301**

**Item 15.1:**

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

CAS No: 000075-07-0  
Name: ACETALDEHYDE

CAS No: 000107-02-8  
Name: ACROLEIN

CAS No: 000630-08-0  
Name: CARBON MONOXIDE

CAS No: 000075-09-2  
Name: DICHLOROMETHANE

CAS No: 000050-00-0  
Name: FORMALDEHYDE

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

CAS No: 007439-92-1  
Name: LEAD

CAS No: 000067-56-1  
Name: METHYL ALCOHOL

CAS No: 000078-93-3  
Name: METHYL ETHYL KETONE

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



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CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 000127-18-4

Name: PERCHLOROETHYLENE

CAS No: 0NY075-00-5

Name: PM-10

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY998-00-0

Name: VOC

**Condition 16: Unavoidable noncompliance and violations**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-1.4**

**Item 16.1:**

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

- (a) The facility owner and/or operator shall compile and maintain records of all equipment 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 commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.
- (b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent



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than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

**Condition 17:**

**Emission Unit Definition**

**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

**Item 17.1:**

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

Emission Unit: C-NYC01

Emission Unit Description:

PAPER COMES OFF THE MILL'S PAPER MACHINE IN LARGE (I.E. - THE WIDTH OF THE PAPER MACHINE) ROLLS. SOME OF THESE ROLLS ARE WRAPPED WHOLE AND SHIPPED DIRECTLY TO END USERS. HOWEVER, A CERTAIN PORTION OF THESE ROLLS ARE CUT TO VARIOUS SIZED SHEETS WHICH ARE BUNDLED IN REAMS. THE REAMS ARE INDIVIDUALLY WRAPPED AND BOXED FOR SHIPMENT. THE CUTTING AND WRAPPING IS COLLECTIVELY KNOWN AS "CONVERTING". THE CUTTING OPERATION CONSISTS OF A SINGLE LENOX SLITTER WHICH BOTH REDUCES THE ROLL STOCK TO INDIVIDUAL SHEETS OF PROPER WIDTH AND REMOVES THE TWO (2) OUTSIDE EDGES (REFERRED TO AS "TRIM") OF THE ROLL. THE TRIM IS CONVEYED PNEUMATICALLY TO A CHOPPER. THE VACUUM FOR THE CONVEYANCE SYSTEM IS PRODUCED BY A QUICK DRAFT MODEL MH-22625 CYCLONE WHICH ALSO SERVES TO CONTROL EMISSIONS OF PARTICULATE MATTER FROM BOTH THE TRIMMING AND CHOPPING

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OPERATIONS. BOTH THE TRIMMED PAPER AND PARTICULATE MATTER (E.E. - PAPER DUST FROM THE CHOPPING OPERATION) ARE CONVEYED BACK TO THE STOCK PREPARATION AREA IN THE PAPER MILL AND "REPULPED".

THE PACKAGING OPERATION (I.E. - FOR BOTH ROLLS AND REAMS) USES SMALL AMOUNTS OF ADHESIVES TO SEAL EACH WRAPPER. ANY REGULATED AIR CONTAMINANTS FROM THESE ADHESIVES ARE FUGITIVE TO THE CONVERTING AREA ROOM AND ARE NOT, THEREFORE, EXHAUSTED THROUGH A DISCRETE EMISSION POINT TO THE ATMOSPHERE. THESE EMISSIONS HAVE NEITHER BEEN QUANTIFIED NOT INCLUDED IN EITHER THE ESTIMATE FOR THE EMITTING UNIT OR THE FACILITY AS A WHOLE.

THIS EMITTING UNIT CONSISTS OF ONE (1) DISCRETE EMISSION POINT ASSOCIATED WITH THE EXHAUST FROM THE CYCLONE. A PROCESS FLOW DIAGRAM HAS BEEN INCLUDED AS SK-III-2.

Building(s): CV01

**Item 17.2:**

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

Emission Unit: P-NYC01

Emission Unit Description:

THIS EMITTING UNIT CONSISTS OF THE BOILER HOUSE, A 20,000 GALLON ABOVE GROUND STORAGE TANK. THE BOILER HOUSE "PROCESS" GENERATES STEAM WHICH IS USED FOR THE PAPER MAKING PROCESS AND FOR HEATING IN PORTIONS OF THE MILL. THE BOILER HOUSE HAS TWO (2) BABCOCK AND WILCOX PACKAGE BOILERS EACH WITH A MAXIMUM HEAT INPUT CAPACITY OF 62.5 MILLION BTU'S PER HOUR (MMBTU/HR). THE TOTAL, MAXIMUM HEAT INPUT CAPACITY OF THE BOILER HOUSE IS THEREFORE 125.0 MMBUT/HR. THE BOILERS ARE FIRED PRIMARILY ON NATURAL GAS. NO. 2 FUEL OIL WITH A MAXIMUM SULFUR CONTENT OF 0.5% (ONE HALF OF ONE PERCENT) IS USED AS A BACK UP FUEL IN THE EVENT OF AN INTERRUPTION IN THE SUPPLY OF NATURAL GAS.

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THIS PERMIT USES MONITORING OF FUEL CONSUMPTION TO VERIFY COMPLIANCE WITH THE CAPPING REQUIREMENTS. MAXIMUM FUEL USE :  
1) FOR NATURAL GAS - 1,000,000,000 CUBIC FEET BASED ON A ROLLING, TWELVE (12) MONTH PERIOD; 2) FOR NO. 2 FUEL OIL - 2,675,000 GALLONS BASED ON A ROLLING TWELVE (12) MONTH PERIOD.

**Item 17.3:**

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

Emission Unit: P-NYC02

Emission Unit Description:

PAPER MACHINE. THE COHOES MILL OF MOHAWK PAPER OPERATES A SINGLE PAPER MACHINE ORIGINALLY DESIGNED, BUILT AND INSTALLED BY THE SANDY HILL CORPORATION. THE MACHINE HAS A DESIGN PRODUCTION CAPACITY OF APPROXIMATELY 264 TONS PER DAY (TPD). TO ACHIEVE PRODUCTION IN EXCESS OF THIS CURRENT MAXIMUM WOULD REQUIRE SUBSTANTIAL, PHYSICAL MODIFICATIONS. THEREFORE, THIS DESIGN MAXIMUM CAPACITY OF 264 TPD IS AN ACCURATE REPRESENTATION OF THE SO-CALLED "STATUS QUO" FOR THIS EMITTING UNIT. THE MACHINE IS COMPRISED OF THREE (3) MORE OR LESS DISCRETE SECTIONS: 1) THE WET END OR SO-CALLED FORMING SECTION; 2) THE MAIN DRYER SECTION; AND 3) THE TWO (2) COATING SECTIONS. EACH SECTION, THEREFORE, HAS BEEN INCLUDED AS A SEPARATE "PROCESS" WITH A MORE COMPLETE DESCRIPTION. A PROCESS SCHEMATIC HAS BEEN INCLUDED SHOWING THE GENERAL ARRANGEMENT OF THIS EMITTING UNIT.

EMISSION ESTIMATES ASSOCIATED WITH THE ORIGINAL PERMIT APPLICATION FOR THE PAPER MACHINE, SUBMITTED IN AUGUST, 1995, WERE COMPILED USING EMISSION FACTORS DEVELOPED BY THE NATIONAL COUNCIL ON AIR AND STREAM IMPROVEMENT (NCASI). SPECIFICALLY, THE EMISSION FACTORS UTILIZED WERE SUMMARIZED IN NCASI TECHNICAL BULLETIN NO. 681 - "VOLATILE ORGANIC EMISSIONS FROM PULP AND MILL SOURCES - PART VII, PULP DRYERS AND PAPER MACHINES AT INTEGRATED CHEMICAL PULP

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MILLS", OCTOBER 1994. WHILE THE COHOES MILL IS NOT AN INTEGRATED CHEMICAL PULP MILL, THE REFERENCED NCASI DOCUMENT DID CONTAIN EMISSION FACTORS DEVELOPED FROM SEPARATE STACK TESTING OF A PAPER MACHINE AT ONE OF THESE MILLS THAT PRODUCED GRADES OF PAPER SIMILAR TO THE GRADES PRODUCED AT THE PAPER MACHINE SIMILAR TO THE ONE CURRENTLY OPERATED AT THE COHOES MILL. THEREFORE, THE EMISSION INFORMATION DEVELOPED FOR THE AUGUST, 1994 PERMIT APPLICATION HAS BEEN USED FOR THIS FACILITY PERMIT APPLICATION.

THE PAPER MACHINE HAS A NUMBER OF SMALL COMBUSTION SOURCES (EXEMPT AS DEFINED IN NYCRR PART 201-3.2(c)(1)) WHICH VENT THROUGH THE PAPER MACHINE EMISSION POINTS. EMISSIONS FROM THESE SOURCES HAVE BEEN SUMMARIZED IN THE "LIST OF EXEMPT ACTIVITIES" INCLUDED AS A SUPPLEMENT TO THIS PERMIT APPLICATION AND ARE REFLECTED IN THE "RANGE CODES" DESIGNATED FOR THE INDIVIDUAL AIR CONTAMINANTS IN THE "FACILITY EMISSIONS SUMMARY" SECTION OF THIS APPLICATION.

Building(s): PMB01

**Condition 18: Air pollution prohibited**  
**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable State R6NYCRR 211.2**

**Item 18.1:**

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.

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

**Condition 19: Emission Point Definition By Emission Unit**



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**Applicable State Requirement: 6NYCRR 201-5**

**Item 19.1:**

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

Emission Unit: C-NYC01

Emission Point: CVN01

Height (ft.): 58

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: CV01

**Item 19.2:**

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

Emission Unit: P-NYC01

Emission Point: CBN01

Height (ft.): 90

Diameter (in.): 72

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: BLDG01

**Item 19.3:**

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

Emission Unit: P-NYC02

Emission Point: PMN01

Height (ft.): 38

Diameter (in.): 36

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: PMB01

Emission Point: PMN02

Height (ft.): 37

Diameter (in.): 13

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: PMB01

Emission Point: PMN03

Height (ft.): 50

Width (in.): 38

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: PMB01

Emission Point: PMN04

Height (ft.): 62

Length (in.): 50

Width (in.): 38

NYTMN (km.): 4734.7    NYTME (km.): 606.4    Building: PMB01

**Condition 20: Process Definition By Emission Unit**

**Effective between the dates of 01/13/2003 and Permit Expiration Date**

**Applicable State Requirement: 6NYCRR 201-5**

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**Item 20.1:**

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

Emission Unit: C-NYC01

Process: V01

Source Classification Code: 3-07-012-01

Process Description:

THIS OPERATION CONSISTS OF A SINGLE LINE OF MACHINES (I.E.- SLITTER; CHOPPER; AND CYCLONE) THAT CONVERTS LARGE ROLLS OF PAPER FROM THE PAPER MACHINE TO REAMS. EACH REAM IS TYPICALLY 25"X38", CONTAINS 500 SHEETS, AND CAN WEIGH FROM 50 TO 90 POUNDS. EACH REAM IS INDIVIDUALLY WRAPPED AND SEALED WITH AN ADHESIVE.

AS PREVIOUSLY DISCUSSED IN THE "EMITTING UNIT" DESCRIPTION, THE AMOUNT OF FUGITIVE EMISSIONS OF AIR CONTAMINANTS IS SMALL (IF ANY), ARE FUGITIVVE TO THE ROOM, AND NOT EMITTED THROUGH A DISCRETE EMISSION POINT.

A VACUUM SYSTEM UTILIZING A CYCLONE COLLECTS PAPER TRIM AND PARTICULATE MATTER (I.E.- PAPER DUST) FROM THE SLITTING AND CHOPPING OPERATIONS. THE COLLECTED MATERIAL IS TYPICALLY RETURNED TO THE STOCK PREPARATION AREA OF THE PAPER MILL WHERE IT'S REPULPED. THE CYCLONE EXHAUSTS THROUGH A SINGLE, DISCRETE EMISSION POINT (CVN-01) TO THE ATMOSPHERE. MANUFACTURER'S DATA INDICATE THAT 99.9% OF THE TRIM AND ASSOICATED PAPER DUST ARE CAPTURED. THEREFORE, FOR THE PURPOSE OF ESTIMATING EMISSIONS FROM THIS PROCESS, IT HAS BEEN ASSUMED THAT 0.01% OF THE TOTAL PARTICULATE MATTER IS EMITTED. THESE CALCULATIONS ARE ATTACHED.

Emission Source/Control: 0CUTK - Control

Control Type: SINGLE CYCLONE

Emission :00CUT - Process

**Item 20.2:**

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

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Emission Unit: P-NYC01  
Process: C01 Source Classification Code: 1-02-006-02

Process Description:  
PROCESS C01 CONSISTS OF COMBUSTION OF  
NATURAL GAS IN EITHER OR BOTH OF THE  
BOILERS. COMBUSTION OF NATURAL GAS IS  
LIMITED TO 1,000,000,000 CUBIC FEET BASED  
ON A ROLLING, TWELVE (12) MONTH PERIOD.

Emission Source/Control: 0BH01 - Combustion  
Design Capacity: 125 million Btu per hour

**Item 20.3:**

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

Emission Unit: P-NYC01  
Process: C02 Source Classification Code: 1-05-002-14

Process Description:  
PROCESS C02 CONSISTS OF COMBUSTION OF NO.  
2 FUEL OIL IN EITHER OR BOTH BOILERS.  
COMBUSTION OF NO. 2 FUEL OIL IS LIMITED TO  
2,675,000 GALLONS BASED ON A ROLLING TWELVE  
(12) PERIOD.

Emiss0BH01 - Combustion  
Design Capacity: 125 million Btu per hour

**Item 20.4:**

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

Emission Unit: P-NYC02  
Process: D01 Source Classification Code: 3-07-013-99

Process Description:  
IN THIS SECTION OF THE PAPER MACHINE,  
WHICH HAS ONE (1) DISCRETE EMISSION POINT  
(I.E. - PMN-03), THE PAPER WEB COMES INTO  
CONTACT WITH A NUMBER OF LARGE, STEAM  
HEATED STEEL CYLINDERS KNOWN AS DRYER CANS.  
AS THE PAPER WEB PASSES THROUGH THE DRYER  
SECTION HEAT ENERGY IS TRANSFERRED FROM THE  
DRYER CAN SURFACE TO THE WATER IN THE WEB  
WHICH IS HEATED AND FLASHED OFF. THE DRYER  
SECTION OF THE PAPER MACHINE IS FULLY  
HOODED. MAKE-UP AIR FOR THE HOOD IS  
PREHEATED PRIOR TO ITS INTRODUCTION INTO  
THE DRYER HOOD SPACE . THIS IS ACCOMPLISHED

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WITH A 4.50 MMBTU/HR NATURAL GAS BURNER (I.E.- THE MAIN DRYER SECTION POCKET VENT BURNER).

(AS THIS IS A DIRECT FIRE BURNER, COMBUSTION EMISSIONS ARE ENTRAINED IN THE MAKE-UP AIR FOR THE HOOD AND VENTED THROUGH THE MAIN DRYER SECTION STACK. HOWEVER, AS THE BURNER IS LESS THAN 10 MMBTU/HR AND THEREFORE EXEMPT, THE AIR CONTAMINANTS ASSOCIATED WITH THE POCKET VENT BURNER ARE NOT INCLUDED IN THE EMISSION SUMMARIES FOR EITHER THE PROCESS (D01) OR THE EMISSION UNIT (P-NYC02). RATHER, THESE DATA ARE CONTAINED IN THE SUMMARY OF EXEMPT POINTS APPENDED TO THIS PERMIT APPLICATION AND THE EMISSIONS ARE REFLECTED IN THE "RANGE CODES" DELINEATED IN THE "FACILITY EMISSIONS SUMMARY" SECTION.)

Emission :000PM - Process

**Item 20.5:**

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

Emission Unit: P-NYC02

Process: F01

Source Classification Code: 3-07-013-99

Process Description:

THE WET END OF THE PAPER MACHINE IS WHERE THE PAPER "WEB" IS INITIALLY FORMED. THIS PORTION OF THE MACHINE USES GRAVITY AND MECHANICAL ENERGY TO REMOVE WATER FROM THE PAPER WEB. THE WEB IS INITIALLY FORMED FROM "WHITWATER" WHICH IS A SOLUTION OF PAPER FIBER AND WATER. THIS SOLUTION, AT ITS POINT OF APPLICATION ON THE PAPER MACHINE, IS APPROXIMATELY 99.5% WATER AND 0.5% PAPER FIBER (THE RATIO OF WATER TO SOLIDS IS KNOWN AS "CONSISTANCY" - IN THIS CASE 0.5% CONSISTANCY).

THE COHOES MACHINE HAS TWO (2) DISCRETE EMISSION POINTS: 1) AN EMISSION POINT THAT EXHAUSTS EMISSIONS FROM THE FOURDRINIER SECTION OF THE WET END OF THE PAPER MACHINE; AND 2) AN EMISSION POINT THAT EXHAUSTS EMISSIONS FROM THE PAPER MACHINE



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VACUUM ROLLS.

THE FOURDRINIER SECTION ACTUALLY INCLUDES THE ENTIRE WET END OF THE PAPER MACHINE (I.E.- INCLUDING THE VACUUM ROLLS). HOWEVER, NCASI TECHNICAL BULLETIN NO.681 INCLUDED EMISSION TESTING RESULTS FOR THE FOURDRINIER SECTION AND VACUUM ROLLS SEPARATELY. IN THE CASE OF THE COHOES MILL PAPER MACHINE, EMISSIONS FROM THE FOURDRINIER SECTION ARE FUGITIVE TO THE ROOM BUT ARE EXHAUSTED THROUGH AN INDIVIDUAL EMISSION POINT PMN-01 WHICH REMOVES AIR FROM THE ROOM.

THE VACUUM ROLL LOCATED AT THE DOWNSTREAM END OF THE PAPER MACHINE IS A PERFORATED, HOLLOW CYLINDER OVER WHICH THE PARTIALLY FORMED PAPER WEB PASSES. A VACUUM IS DRAWN FROM THE CENTER OF THE CYLINDER WHICH REMOVES ADDITIONAL WATER FROM THE PAPER WEB PRIOR TO THE WEB'S ENTERING THE FIRST SECTION OF DRYERS. EMISSIONS FROM THE VACUUM ROLL EXHAUST ARE EMITTED THROUGH EMISSION POINT PMN-02.

Emission Source/Control: 000PM - Process

**Item 20.6:**

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

Emission Unit: P-NYC02

Process: K01

Source Classification Code: 3-07-013-99

Process Description:

THE COATING SECTION OF THE PAPER MACHINE IS COMPRISED OF A COMBINATION ROLL AND BLADE COATER (REFERRED TO AS THE "BILLBLADE COATER"), A STAND ALONE BLADE COATER AND SECTIONS OF DRYER CANS.

THE BILLBLADE HAS THE ABILITY TO APPLY COATINGS TO BOTH SIDES OF THE PAPER SHEET SIMULTANEOUSLY WHILE THE BLADE COATER CAN ONLY APPLY A COATING SOLUTION TO ONE (1) SIDE OF THE SHEET.

EACH COATER IS FOLLOWED BY A BANK OF GAS FIRED INFRARED DRYERS AND A SECTION OF DRY

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CANS. BOTH DRYER SECTIONS ARE INCLUDED IN A SINGLE HOOD WHICH EXHAUSTS THROUGH A SINGLE EMISSION POINT (PMN-04). MAKE-UP AIR FOR THE HOOD IS PREHEATED PRIOR TO ITS INTRODUCTION INTO THE DRYER HOOD SPACE. THIS IS ACCOMPLISHED WITH A 1.59 MMBTU/HR NATURAL GAS BURNER (I.E.- THE MAIN DRYER SECTION POCKET VENT B URNER). AS THIS IS A DIRECT FIRE BURNER, COMBUSTION EMISSIONS ARE ENTRAINED IN THE MAKE-UP AIR FOR THE HOOD AND VENTED THROUGH THE MAIN DRYER SECTION STACK.

HOWEVER, AS THE BURNER IS LESS THAN 10 MMBTU/HR AND THEREFORE EXEMPT, THE AIR CONTAMINANTS ASSOCIATED WITH THE POCKET VENT BURNER ARE NOT INCLUDED IN THE EMISSION SUMMARIES FOR EITHER THE PROCESS (KO1) OR THE EMISSION UNIT (P-NYC02). RATHER, THESE DATA ARE CONTAINED IN THE SUMMARY OF EXEMPT POINTS APPENDED TO THIS PERMIT APPLICATION AND THE EMISSIONS ARE REFLECTED IN THE "RANGE CODE" DELINEATED IN THE "FACILITY EMISSIONS SUMMARY"

SECTION.

THIS PROCESS IS NOT SUBJECT TO VOC RACT AS CONTAINED IN 6NYCRR PART 228. THIS IS BECAUSE ALL COATING FORMULATIONS CURRENTLY IN USE BY MOHAWK PAPER MILLS, INC. AT THE COHOES MILL CONTAIN LESS THAN 2.9 LBS PER GALLON ON COATING (AS COMPUTED IN ACCORDANCE WITH 6NYCRR PART 228.1(d)(3)).

Emission Source/Control: 000PM - Process