

Facility DEC ID: 5154800008

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

**IDENTIFICATION INFORMATION**

Permit Type: Air Title V Facility  
Permit ID: 5-1548-00008/00081  
Mod 0 Effective Date: 03/19/2017 Expiration Date: 03/18/2022  
Mod 1 Effective Date: 05/28/2019 Expiration Date: 03/18/2022  
Mod 2 Effective Date: 01/21/2020 Expiration Date: 03/18/2022

Permit Issued To: INTERNATIONAL PAPER COMPANY  
6400 POPLAR AVE  
MEMPHIS, TN 38197

Contact: Timothy Stocker  
568 Shore Airport Rd  
Mill Manager  
Ticonderoga, NY 12883  
(518) 585-5300

Facility: INTERNATIONAL PAPER TICONDEROGA MILL  
568 SHORE AIRPORT RD  
TICONDEROGA, NY 12883

Contact: Heather Perry  
568 Shore Airport Rd  
Ticonderoga, NY 12883  
(518) 585-5663

Description:  
Fully integrated pulp and paper manufacturer of printing papers. Facility processes hardwood and softwood pulp log and chip raw materials using the kraft process. Converted kraft pulp is washed, bleached and prepared for finishing by paper machines. Parent rolls produced by the machines are rewound and cut into smaller various width rolls for in-house finishing or direct shipment to customers. Rolls sent for in-house finishing are cut into sheets to meet customer specifications, packaged and stored in on-site warehousing to await shipping to customer.

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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: ERIN L BURNS  
NYSDEC - REGION 5  
PO BOX 296  
RAY BROOK, NY 12977-0296

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_

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### 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.

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**DEC GENERAL CONDITIONS**

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- 5 5 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 5 6 Submission of application for permit modification or renewal-REGION 5 HEADQUARTERS

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**DEC GENERAL CONDITIONS**

\*\*\*\* General Provisions \*\*\*\*

**For the purpose of your Title V permit, the following section contains state-only enforceable terms and conditions.**

**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

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submitted prior to actual transfer of ownership.

**Condition 1-1: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 1-1.1:**

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 1-1.2:**

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

**Item 1-1.3**

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 5 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 5 Headquarters  
 Division of Environmental Permits

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Route 86, PO Box 296  
Ray Brook, NY 12977-0296  
(518) 897-1234

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

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: INTERNATIONAL PAPER COMPANY  
6400 POPLAR AVE  
MEMPHIS, TN 38197

Facility: INTERNATIONAL PAPER TICONDEROGA MILL  
568 SHORE AIRPORT RD  
TICONDEROGA, NY 12883

Authorized Activity By Standard Industrial Classification Code:  
2611 - PULP MILLS  
2621 - PAPER MILLS EXC BUILDING PAPER

Mod 0 Permit Effective Date: 03/19/2017

Permit Expiration Date: 03/18/2022

Mod 1 Permit Effective Date: 05/28/2019

Permit Expiration Date: 03/18/2022

Mod 2 Permit Effective Date: 01/21/2020

Permit Expiration Date: 03/18/2022



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- 10 3 6 NYCRR 201-6.4 (a) (7): Fees
- 10 4 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 10 5 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 11 6 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 13 7 6 NYCRR 201-6.4 (e): Compliance Certification
- 15 8 6 NYCRR 202-2.1: Compliance Certification
- 15 9 6 NYCRR 202-2.5: Recordkeeping requirements
- 15 10 6 NYCRR 215.2: Open Fires - Prohibitions
- 17 11 6 NYCRR 200.7: Maintenance of Equipment
- 17 12 6 NYCRR 201-1.7: Recycling and Salvage
- 17 13 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 17 14 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 18 15 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 18 16 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 18 17 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 19 18 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 19 19 6 NYCRR 202-1.1: Required Emissions Tests
- 19 20 40 CFR Part 68: Accidental release provisions.
- 20 21 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 20 22 6 NYCRR Subpart 201-6: Emission Unit Definition
- 24 23 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 24 1 6 NYCRR 201-6.4 (g): Non Applicable requirements
- 25 1-1 6 NYCRR 211.2: Visible Emissions Limited
- 25 25 6 NYCRR 212-1.6 (a): Compliance Certification
- 26 26 6 NYCRR 225-2.7: Compliance Certification
- 27 27 6 NYCRR 249.3 (f): Compliance Certification
- 27 28 40CFR 60, NSPS Subpart IIII: Compliance Certification
- 28 29 40CFR 60, NSPS Subpart JJJJ: Compliance Certification
- 28 30 40CFR 63.8(d)(2), Subpart A: Compliance Certification
- 29 31 40CFR 63.10, Subpart A: 63.10(b) General Recordkeeping Requirements
- 30 32 40CFR 63.10, Subpart A: 63.10(b) General Reporting Requirements
- 30 33 40CFR 63.10, Subpart A: Compliance Certification
- 31 34 40CFR 63.10, Subpart A: Compliance Certification
- 32 35 40CFR 63, Subpart S: Compliance Certification
- 32 36 40CFR 63.454(b), Subpart S: Compliance Certification
- 33 37 40CFR 63.454(b), Subpart S: Compliance Certification
- 34 38 40CFR 63, Subpart MM: Compliance Certification
- 35 39 40CFR 63, Subpart ZZZZ: Compliance Certification

**Emission Unit Level**

- 35 40 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 42 41 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

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**EU=B-PLANT**

- 53 42 40CFR 63.445(b), Subpart S: Bleaching Systems -  
 Closed-vent System and Control Device Requirements
- 53 43 40CFR 63.445(c)(2), Subpart S: Compliance Certification
- 54 44 40CFR 63.450(d), Subpart S: Compliance Certification

**EU=B-PLANT,Proc=116,ES=10094**

- 55 45 40CFR 63.453(c), Subpart S: Compliance Certification
- 56 46 40CFR 63.453(c), Subpart S: Compliance Certification
- 56 47 40CFR 63.453(c), Subpart S: Compliance Certification

**EU=P-OWERH**

- 57 1-2 6 NYCRR 200.6: Compliance Certification
- 58 49 6 NYCRR 225-1.6 (a): Compliance Certification
- 59 50 6 NYCRR 225-2.3 (b) (1): Compliance Certification
- 60 51 6 NYCRR 227-1.2: Compliance Certification
- 61 52 6 NYCRR 227-1.2 (a) (3): Compliance Certification
- 62 53 6 NYCRR 227-2.5 (c): Compliance Certification
- 63 54 40CFR 63, Subpart DDDDD: Compliance Certification

**EU=P-OWERH,Proc=107,ES=10044**

- 63 55 40CFR 63, Subpart DDDDD: Compliance Certification
- 64 56 40CFR 63, Subpart DDDDD: Compliance Certification
- 66 57 40CFR 63, Subpart DDDDD: Compliance Certification
- 67 58 40CFR 63, Subpart DDDDD: Compliance Certification
- 68 59 40CFR 63.7540(a), Subpart DDDDD: Compliance Certification

**EU=P-OWERH,Proc=111**

- 68 60 40CFR 63.443(d)(4), Subpart S: Compliance Certification

**EU=P-OWERH,EP=00044**

- 69 61 6 NYCRR 227-1.3 (a): Compliance Certification
- 70 1-3 6 NYCRR 227-2.4 (a) (1): Compliance Certification
- 71 63 40CFR 52.21(k), Subpart A: Compliance Certification
- 72 64 40CFR 52.21(k), Subpart A: Compliance Certification
- 72 65 40CFR 52.21(k), Subpart A: Compliance Certification

**EU=P-OWERH,EP=00044,Proc=106,ES=10044**

- 73 1-4 40CFR 63.7520, Subpart DDDDD: Compliance Certification
- 74 1-5 40CFR 63.7530(b), Subpart DDDDD: Compliance Certification
- 75 1-6 40CFR 63.7530(b), Subpart DDDDD: Compliance Certification
- 76 1-7 40CFR 63.7530(b), Subpart DDDDD: Compliance Certification
- 76 1-8 40CFR 63.7530(c), Subpart DDDDD: Compliance Certification
- 77 1-9 40CFR 63.7530(c), Subpart DDDDD: Compliance Certification

**EU=P-ULPIN**

- 78 66 40CFR 63.443(d), Subpart S: Compliance Certification
- 79 67 40CFR 63.446(e)(1), Subpart S: Compliance Certification
- 80 68 40CFR 63.450(d), Subpart S: Compliance Certification

**EU=R-CAUST,Proc=115**

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- 81 1-10 6 NYCRR 212-2.1 (b): Compliance Certification
- 81 1-11 6 NYCRR 212-2.1 (b): Compliance Certification
- 82 2-1 6 NYCRR 212-3.1 (a): Compliance Certification

**EU=R-CAUST,Proc=115,ES=10005**

- 83 72 6 NYCRR 225-2.3 (b) (1): Compliance Certification

**EU=R-CAUST,Proc=115,ES=10077**

- 84 73 40CFR 63.864(k), Subpart MM: Compliance Certification
- 85 74 40CFR 63.864(k), Subpart MM: Compliance Certification

**EU=R-CAUST,EP=00005**

- 86 75 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

**EU=R-ECOV B**

- 87 1-12 6 NYCRR 212-2.1 (b): Compliance Certification
- 88 1-13 6 NYCRR 212-2.1 (b): Compliance Certification
- 89 78 6 NYCRR 212-2.4 (b): Compliance Certification

**EU=R-ECOV B,Proc=103,ES=10001**

- 89 79 6 NYCRR 212-3.1 (a): Compliance Certification
- 90 80 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification
- 91 81 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification
- 92 82 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification
- 92 83 40CFR 63.864(d), Subpart MM: Compliance Certification
- 93 84 40CFR 63.864(k), Subpart MM: Compliance Certification
- 94 85 40CFR 63.864(k), Subpart MM: Compliance Certification
- 94 86 40CFR 63.867(b)(3), Subpart MM: Compliance Certification

**EU=R-ECOV B,Proc=105,ES=10003**

- 95 87 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

**EU=R-ECOV B,Proc=105,ES=10102**

- 96 88 40CFR 63.864(k), Subpart MM: Compliance Certification
- 97 89 40CFR 63.864(k), Subpart MM: Compliance Certification

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 100 90 ECL 19-0301: Contaminant List
- 101 91 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 101 24 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

**EU=P-OWERH**

- 102 92 6 NYCRR 225-1.5 (c): Compliance Demonstration

**EU=P-OWERH,Proc=106**

- 102 93 6 NYCRR 225-1.4 (a): Compliance Demonstration

**EU=P-OWERH,Proc=126**

- 103 94 6 NYCRR 225-1.4 (a): Compliance Demonstration

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**FEDERALLY ENFORCEABLE CONDITIONS**

Renewal 3/Mod 2/FINAL

\*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.**

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

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

**Item B: Timely Application for the Renewal of Title V Permits - 6 NYCRR 201-6.2 (a) (4)**

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

**Item C: Certification by a Responsible Official - 6 NYCRR 201-6.2 (d) (12)**

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

**Item D: Requirement to Comply With All Conditions - 6 NYCRR 201-6.4 (a) (2)**

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

**Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR 201-6.4 (a) (3)**

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and

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reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

**Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4 (a) (5)**

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

**Item G: Property Rights - 6 NYCRR 201-6.4 (a) (6)**

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

**Item H: Severability - 6 NYCRR 201-6.4 (a) (9)**

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

**Item I: Permit Shield - 6 NYCRR 201-6.4 (g)**

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

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

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

iii. The applicable requirements of Title IV of the Act;

iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item J: Reopening for Cause - 6 NYCRR 201-6.4 (i)**

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

i. When additional applicable requirements under the act become applicable to a title V facility with a remaining permit term of three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the department pursuant to the provisions of section 201- 6.6 of this Subpart.

ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.

iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit

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is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

**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.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES**

**The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.**

**Condition 2: Acceptable Ambient Air Quality  
Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 200.6****Item 2.1:**

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



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contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Condition 3: Fees**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (7)**

**Item 3.1:**

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0303.

**Condition 4: Recordkeeping and Reporting of Compliance Monitoring**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c)**

**Item 4.1:**

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii)The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.2 of Part 201.

**Condition 5: Records of Monitoring, Sampling, and Measurement**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (c) (2)**

**Item 5.1:**

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all

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reports required by the permit.

**Condition 6: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (c) (3) (ii)**

**Item 6.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 6.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

- (1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
- (2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.
- (3) For all other deviations from permit requirements,

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the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.2(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. 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. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual

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report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.4(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 7: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 7.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 7.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as

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specified in any special permit terms or conditions;  
and  
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department's Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Stationary Source Compliance Section  
USEPA Region 2  
Air Compliance Branch  
290 Broadway  
New York, NY 10007-1866

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
Region 5 Suboffice  
232 Golf Course Road  
Warrensburg, NY 12885-1172

The address for the BQA is as follows:

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Bureau of Quality Assurance  
 625 Broadway  
 Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 4/30/2017.  
 Subsequent reports are due on the same day each year

**Condition 8: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 202-2.1**

**Item 8.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 8.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year. Statements are to be mailed to: New York State Department of Environmental Conservation, Division of Air Resources, Bureau of Air Quality Planning, 625 Broadway, Albany NY 12233-3251

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due by April 15th for previous calendar year

**Condition 9: Recordkeeping requirements**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 202-2.5**

**Item 9.1:**  
 (a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
  - (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.
- (b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

**Condition 10: Open Fires - Prohibitions**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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**Applicable Federal Requirement: 6 NYCRR 215.2****Item 10.1:**

Except as allowed by Title 6 NYCRR Section 215.3, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

**Item 10.2**

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.
- (j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.
- (k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.
- (l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

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**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS  
SUBJECT TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period.

[NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]

**Condition 11: Maintenance of Equipment**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 200.7**

**Item 11.1:**

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.

**Condition 12: Recycling and Salvage**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 201-1.7**

**Item 12.1:**

Where practical, the owner or operator of an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of the ECL.

**Condition 13: Prohibition of Reintroduction of Collected Contaminants to the air**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 201-1.8**

**Item 13.1:**

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.

**Condition 14: Exempt Sources - Proof of Eligibility**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 201-3.2 (a)**

**Item 14.1:**

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make



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them available to representatives of the department upon request.

**Condition 15: Trivial Sources - Proof of Eligibility**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-3.3 (a)**

**Item 15.1:**

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

**Condition 16: Requirement to Provide Information**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (4)**

**Item 16.1:**

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

**Condition 17: Right to Inspect**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 201-6.4 (a) (8)**

**Item 17.1:**

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and

(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

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**Condition 18: Off Permit Changes**

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement:6 NYCRR 201-6.4 (f) (6)

**Item 18.1:**

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.4 shall not apply to any change made pursuant to this paragraph.

**Condition 19: Required Emissions Tests**

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement:6 NYCRR 202-1.1

**Item 19.1:**

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

**Condition 20: Accidental release provisions.**

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement:40 CFR Part 68

**Item 20.1:**

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

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- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
  - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
  - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center  
 C/O CSC  
 8400 Corporate Dr  
 Carrollton, Md. 20785

**Condition 21: Recycling and Emissions Reduction**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 82, Subpart F**

**Item 21.1:**  
 The permittee shall comply with all applicable provisions of 40 CFR Part 82.

**The following conditions are subject to annual compliance certification requirements for Title V permits only.**

**Condition 22: Emission Unit Definition**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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

**Item 22.1(From Mod 2):**  
 The facility is authorized to perform regulated processes under this permit for:  
 Emission Unit: R-CAUST  
 Emission Unit Description:

Recausticizing area source: the Ticonderoga Mill  
 recausticizing area performs the following tasks:  
 clarifies green liquor from the smelt dissolving tank. -  
 produces white liquor slurry by reacting clarified green  
 liquor with burnt lime from the kiln and/or purchased lime  
 via slaker and causticizers. - clarifies white liquor  
 slurry producing white liquor for use in the digester. -  
 washes, stores and feeds lime mud from the white liquor  
 clarifiers and converts it into "burnt " lime through a  
 process called "calcining" in the lime kiln. The lime  
 kiln burns natural gas, #2 fuel oil or #6 fuel oil and

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uses propane or natural gas as a fuel for startup and process stabilization. Equipment in the recausticizing area includes a lime kiln, one green liquor clarifier, two green liquor storage tanks, one lime slaker, three causticizers, one white liquor clarifier, two white liquor storage tanks, one white liquor receiver tank, one sewer clarifier, one mud washer tank, one weak wash storage tank, lime mud mix tank, lime mud storage tank, mud filter hood vent, and vacuum pumps for the dregs filters and lime mud filter.

Building(s): 19

**Item 22.2(From Mod 0):**

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

Emission Unit: 0-PAPER

Emission Unit Description:

Paper mill: the paper mill converts pulp to various finished paper products via the nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Building(s): 4

**Item 22.3(From Mod 0):**

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

Emission Unit: 0-WWTRT

Emission Unit Description:

The Ticonderoga Mill wastewater treatment plant provides neutralization, primary clarification, secondary biological treatment with aeration, wetlands treatment, secondary clarification, tertiary clarification, primary sludge dewatering and secondary sludge dewatering. Sources of wastewater include wood handling, pulp production, paper manufacturing, water treatment plant solids, boiler water treatment, electrical power generation, landfill leachate, sanitary wastewater and stormwater. Wastewater is conveyed to the various sections of the wastewater treatment plant through a network of underground pipelines.

Building(s): 35

**Item 22.4(From Mod 0):**

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

Emission Unit: B-PLANT

Emission Unit Description:

Bleach plant area source: The bleach plant whitens pulp for paper production. Equipment venting to the bleach plant scrubber includes the #10 tower (first bleaching stage), #15 seal pit and washer hood, #25 seal pit and

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washer hood, #35 seal pit and washer hood, #45 seal pit and washer hood, #55 seal pit and washer hood, #30 tower (third bleaching stage), #50 tower (fifth bleaching stage), the chlorine dioxide absorber, the pulp mill acid sewer, the emergency pressure relief hatches from two chlorine dioxide generators, the vents from two chlorine dioxide storage tanks, the spent acid surge tank and a vent from a pulp mill chemical lab hood.. Processes that do not vent to the bleach plant scrubber include the second bleaching stage (20 tower) the fourth bleaching stage (40 tower) and four bleach pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Building(s): 6

**Item 22.5(From Mod 1):**

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

Emission Unit: P-OWERH

Emission Unit Description:

The power boiler is a multi-fuel boiler that is permitted to fire natural gas, #2 fuel oil, # 6 fuel oil, waste fuel type "A", wood residue consisting of bark, wood and sawdust, rejected digester wood knots, primary clarifier fiber and dried secondary biomass for the production of steam and electricity via a turbine generator. In addition, the power boiler is used to treat non-condensable gases (NCGs), which are produced in the pulping and chemical recovery processes, through thermal oxidation. It is not an incinerator and incinerator regulations such as 6NYCRR Part 219 and 40CFR61 Subpart E do not apply.

Building(s): 29

**Item 22.6(From Mod 0):**

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

Emission Unit: P-ULPIN

Emission Unit Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulp washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA. The digester system includes a continuous digester, two flash tanks, 4 flash steam condensers, two blow tanks, a chip bin feeder, a low pressure feeder, and

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a digester acid wash tank. Non-condensable gases (NCGs) are collected from all components of the digester system, except the low pressure feeder, for thermal oxidation in the power boiler. The low pressure feeder vents to the atmosphere only during digester start-up and shut-down. The evaporator system includes a six-effect evaporator, two concentrators, 2 surface condensers, a hogging ejector for the surface condensers, an air ejector, and evaporator seal tank, and a stripper feed jug. NCGs are collected from all components except the hogging ejector which is used only during evaporator start-up. The powerhouse black liquor spill tank collects liquor from process upsets, such as evaporator upsets, for use after the process stabilizes. This tank is vented to the HVLC system as part of the NESHAP. The knotter system includes two pressure primary knotters and two secondary knotters. NCGs from the system are collected for thermal oxidation at the secondary knotters. Knots leaving the knotter system are either conveyed pneumatically to the top of the digester for fiber recovery, through a cyclone, or ejected from the pulp mill for disposal or energy recovery. The pulp washing system includes a pressure diffuser, a black liquor dump tank, a black liquor holding tank, a diffuser filtrate tank, two vacuum drum brown stock washers, two washer seal tanks and a washed stock storage tank. NCGs are collected from all components except the washed stock storage tank. The primary rejects tank and the secondary rejects tank vent to the washed stock storage tank. Both of these tanks are part of the screen system. The decker system includes two vacuum deckers, a decker white water tank, a decker low density storage tank and a fiber salvage tank. The deckers and the decker low density storage tank are vented to a separate stack. The decker white water tank vents directly to the atmosphere from the tank. This emission unit also includes an unbleached hardwood pulp high density storage tank and an unbleached softwood high density storage tank. Both tanks vent to the atmosphere. The NCG collection system also collects NCGs from various weak and strong black liquor tanks that include two weak liquor tanks, two 50% liquor tanks, sour condensate tank, 2 strong liquor tanks, 2 black liquor soap storage tanks, the evaporater seal tanks, 3 precipitator mix tanks, an economizer liquor mix tank, and a salt cake mix tank. The non-condensable gas system delivers NCGs to the power boiler for thermal treatment.

Building(s): 19  
29  
6

**Item 22.7(From Mod 1):**

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

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Emission Unit: R-ECOV B

Emission Unit Description:

The recovery furnace emission unit consists of a kraft recovery furnace and a smelt dissolving tank. The recovery furnace fires black liquor and #6 or #2 fuel oil to produce steam for manufacturing operations and smelt. Smelt (sulfur and sodium chemicals recycled in the draft process) flows from the bottom of the recovery boiler into the smelt dissolving tank to form green liquor. Recovery emissions flow through an electrostatic precipitator. Smelt dissolving tank emissions flow through a wet impact wet scrubber.

Building(s): 29

**Item 22.8(From Mod 1):**

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

Emission Unit: W-OODYD

Emission Unit Description:

The woodyard processing area provides delivery and storage of wood chips, round wood delivery, debarking, chipping, and chip screening. Wood chips are pneumatically blown to chip piles with 5 chip blowers. Two cyclones in the woodroom receive wood chips blown pneumatically from the chip storage area.

Building(s): 16  
54**Condition 23: Progress Reports Due Semiannually**

Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 201-6.4 (d) (4)****Item 23.1:**

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

- (i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and
- (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

**Condition 1: Non Applicable requirements**

Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:6 NYCRR 201-6.4 (g)****Item 1.1:**

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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.

6 NYCRR 225-1.7

Emission Unit: RECOVB

Reason: 6 NYCRR 225-1.7

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input to the boiler.

6 NYCRR Subpart 227-1

Emission Unit: RECOVB

Reason: 6 NYCRR Subpart 227-1

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source. Fuel oil contributes less than 10% of the heat input of the boiler.

40 CFR 63.443 (a)

Emission Unit: PULPIN Process: 120

Reason: 40 CFR 63.443 (a)

Emission Unit: PULPIN Process: 120

Reason: The decker system is not applicable to MACT Subpart S pulping system standards because it uses only fresh water, paper machine white water or process water with a total HAP concentration less than 400 parts per million by weight.

**Condition 1-1: Visible Emissions Limited****Effective between the dates of 05/28/2019 and 03/18/2022****Applicable Federal Requirement: 6 NYCRR 211.2****Item 1-1.1:**

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.

**Condition 25: Compliance Certification****Effective between the dates of 03/19/2017 and 03/18/2022****Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)****Item 25.1:**



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The Compliance Certification activity will be performed for the facility:  
 The Compliance Certification applies to:

Emission Unit: 0-PAPER

Emission Unit: P-ULPIN

Emission Unit: R-CAUST

Emission Unit: W-ODYD

**Item 25.2:**

Compliance Certification 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 6 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: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 26: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 225-2.7**

**Item 26.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 26.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person delivering waste fuel A to a facility burning such waste fuel, must perform analyses or adopt procedures to assure compliance with Table 2-1 of section 225-2.4 of this Subpart prior to delivery. Sampling and analysis of waste fuel samples must be carried out in accordance with methods acceptable to the commissioner. A list of acceptable methods may be obtained from any office of the

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Department of Environmental Conservation.  
 The facility must maintain and retain records provided by the waste fuel supplier pursuant to this section and make such records available for inspection by the commissioner or his representative upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 27: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 249.3 (f)**

**Item 27.1:**  
 The Compliance Certification activity will be performed for the Facility.

**Item 27.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The emission limits in this permit for NOx, SO2, and/or PM10 established under Part 249 are based on New York's Best Available Retrofit Technology (BART) Rule (6 NYCRR Part 249), are effective on the date of this permit's issuance, and are state-enforceable. Federal enforceability of these facility-specific requirements is effective on the date on which these emission limits, as submitted to EPA as a revision to New York State's Implementation Plan for Regional Haze, are published in the Federal Register.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 28: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart IIII**

**Item 28.1:**  
 The Compliance Certification activity will be performed for the Facility.

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**Item 28.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility with exempt engines under 201-3.2(c) which are subject to the requirements of 40 CFR 60 Subpart IIII shall maintain all associated compliance records and maintenance logs required of that rule for all subject emergency and non-emergency stationary combustion engines.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 29: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ**

**Item 29.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 29.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility with exempt engines under 201-3.2(c) which are subject to the requirements of 40 CFR 60 Subpart JJJJ shall maintain all associated compliance records and maintenance logs required of that rule for all subject emergency and non-emergency stationary combustion engines.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 30: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.8(d)(2), Subpart A**

**Item 30.1:**

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The Compliance Certification activity will be performed for the Facility.

**Item 30.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected source that is required to use a CMS and is subject to the monitoring requirements of this section and a relevant standard shall develop and implement a CMS quality control program. As part of the quality control program, the owner or operator shall develop and submit to the Administrator for approval upon request a site specific performance evaluation test plan for the CMS performance evaluation required in paragraph (e)(3)(i) of this section, according to the procedures specified in paragraph (e).

Each quality control program shall include a written protocol. The owner or operator shall keep these written procedures on file for the life of the affected source or until the affected source is no longer subject to the provisions of this part, to be made available for inspection, upon request, by the Administrator.

Previous or suspended versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan. Where relevant, e.g., program of corrective action for a malfunctioning CMS, these written procedures may be incorporated as part of the affected source's startup, shutdown and malfunction plan to avoid duplication of planning and recordkeeping efforts.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 31: 63.10(b) General Recordkeeping Requirements**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.10, Subpart A**

**Item 31.1:**

The owner or operator of an affected source subject to the provisions of this part shall maintain

files of all information (including all reports and notifications) required by this part recorded in a

form suitable and readily available for expeditious inspection and review. The files shall be

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retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

**Condition 32: 63.10(b) General Reporting Requirements**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.10, Subpart A**

**Item 32.1:**

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

**Condition 33: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.10, Subpart A**

**Item 33.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 33.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

For each emission source subject to 40 CFR 63 Subpart MM requirements, a periodic SSM report must be submitted that briefly describes each malfunction and each startup or shutdown event causing an exceedence of the MACT limit. Reports are only required if a startup, shutdown or malfunction event occurs during the reporting period and causes a MACT emission limit exceedence. This report must contain the information outlined in 63.10(d)(5)(i) and the relevant parts of Subpart MM. The semiannual reports may be submitted simultaneously with the MACT Excess Emissions and Continuous Monitoring System report required by other conditions in this permit. Any time an action taken during a startup, shutdown or malfunction event that caused the source to exceed any applicable emission limitation in the relevant emission

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standards is not consistent with the procedures specified in the mill's SSM plan, the mill shall report the actions taken for that event within 2 working days after commencing actions inconsistent with the plan followed by a letter within 7 working days after the end of the event. These notifications meet the requirements listed in 40 CFR 63.10(d)(5)(ii).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 34: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.10, Subpart A**

**Item 34.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 34.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

As described in 63.10(e)(3), reports of excess emissions and parameter monitoring exceedences must be submitted for sources that are required by subparts S and MM to install continuous monitoring systems. A combined report may be submitted for Subpart S and Subpart MM requirements. For sources demonstrating less than 1% excess emissions and less than 5% continuous monitor downtime during the reporting period, only a Summary report is required. The Summary report shall be entitled "Summary Report - Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and must contain the information outlined in 63.10(e)(3)(vi). For sources with more than 1% excess emissions or more than 5% continuous monitor downtime during the reporting period, both the Summary report and a Detailed report must be submitted. The detailed report must identify the specific time period, the cause and correction for each event as outlined in 63.10(c)(5) through (13).

Semiannual reporting periods in this permit are defined as April through September and October through March.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

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Reports due 30 days after the reporting period.  
The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 35: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63, Subpart S**

**Item 35.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 35.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

In response to an action to enforce the standards set forth in 40 CFR 63.443(c) and (d), 63.445(b) and (c), 63.446(c), (d) and (e), or 63.450(d), the owner or operator may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction as defined at 40 CFR 63.2. The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation that it has met the requirements set forth in 40 CFR 63.456(a). This affirmative defense report shall be included in the first periodic compliance, deviation or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard. If such compliance, deviation or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation or excess emission report due after the initial occurrence of the violation of the relevant standard.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 36: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.454(b), Subpart S**

**Item 36.1:**

The Compliance Certification activity will be performed for the Facility.

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**Item 36.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall prepare and maintain a site-specific inspection plan including a drawing, schematic or pictures of the affected enclosures, closed vent system, and process condensate components. Inspection of the ductwork, piping, enclosures, and connections to covers shall be performed each month to identify evidence of visual defects and to ensure that closure mechanisms and bypass valves are maintained in the closed position. The following information shall be recorded for each monthly inspection:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) The nature of the defect or leak and the method of detection;
- (4) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
- (5) Repair methods applied in each attempt to repair the leak or defect;
- (6) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
- (7) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
- (8) The date of successful repair of the leak or defect;
- (9) The position and duration of opening of bypass line valves and the condition of any valve seals; and
- (10) The duration of the use of bypass valves on computer controlled valves.

Monitoring Frequency: MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 37: Compliance Certification****Effective between the dates of 03/19/2017 and 03/18/2022****Applicable Federal Requirement: 40CFR 63.454(b), Subpart S****Item 37.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 37.2:**

Compliance Certification shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator shall demonstrate initially and annually that the enclosure openings are maintained at negative pressure and that positive pressure portions of closed vent systems and each condensate tank used in the closed vent collection system operate with no detectable leaks as specified by 63.453(k)(3) and (4). For each required demonstration, the following information will be recorded:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) Results of negative pressure tests for enclosures;
- (4) Results of leak detection tests;
- (5) Nature of defect or leak and method of detection;
- (6) Date defect or leak was detected and date of each attempt to repair the defect or leak;
- (7) Repair method applied in each attempt to repair the defect or leak;
- (8) Reason for the delay if the defect or leak is not repaired within 15 days;
- (9) Expected date of successful repair if the repair is not completed within 15 days;
- (10) Date of successful repair of the leak or defect

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 38: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63, Subpart MM**

**Item 38.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 38.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must develop and implement a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and

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malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan must include the requirements in paragraphs 40CFR63.866(a) and 40CFR63.6(e)(3).

Excess emissions during startup, shutdown or malfunction will not be considered violations of the applicable requirements if the procedures of the SSM plan are followed during the episode.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 39: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63, Subpart ZZZZ**

**Item 39.1:**

The Compliance Certification activity will be performed for the Facility.

**Item 39.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A facility with exempt engines under 201-3.2(c) which are subject to the requirements of 40 CFR 63 Subpart ZZZZ shall maintain all associated compliance records and maintenance logs required of that rule for all subject emergency and non-emergency stationary combustion engines.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

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

**Condition 40: Emission Point Definition By Emission Unit**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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

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**Item 40.1(From Mod 0):**

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

Emission Unit: 0-PAPER

- Emission Point: 00041  
 Height (ft.): 25                      Diameter (in.): 6  
 NYTMN (km.): 4861.192    NYTME (km.): 628.52    Building: 4
  
- Emission Point: 00047  
 Height (ft.): 9 Diameter (in.): 62  
 NYTMN (km.): 4861.19    NYTME (km.): 628.523    Building: 4
  
- Emission Point: 00048  
 Height (ft.): 9 Diameter (in.): 62  
 NYTMN (km.): 4861.188    NYTME (km.): 628.525    Building: 4
  
- Emission Point: 00049  
 Height (ft.): 11                      Diameter (in.): 62  
 NYTMN (km.): 4861.186    NYTME (km.): 628.526    Building: 4
  
- Emission Point: 00050  
 Height (ft.): 59                      Diameter (in.): 60  
 NYTMN (km.): 4861.184    NYTME (km.): 628.529    Building: 4
  
- Emission Point: 00051  
 Height (ft.): 75                      Diameter (in.): 24  
 NYTMN (km.): 4861.182    NYTME (km.): 628.53    Building: 4
  
- Emission Point: 00052  
 Height (ft.): 80                      Length (in.): 59                      Width (in.): 39  
 NYTMN (km.): 4861.18    NYTME (km.): 628.533    Building: 4
  
- Emission Point: 00053  
 Height (ft.): 80                      Length (in.): 59                      Width (in.): 39  
 NYTMN (km.): 4861.178    NYTME (km.): 628.533    Building: 4
  
- Emission Point: 00054  
 Height (ft.): 80                      Length (in.): 59                      Width (in.): 39  
 NYTMN (km.): 4861.179    NYTME (km.): 628.534    Building: 4
  
- Emission Point: 00055  
 Height (ft.): 83                      Diameter (in.): 58  
 NYTMN (km.): 4861.189    NYTME (km.): 628.513    Building: 4
  
- Emission Point: 00056  
 Height (ft.): 83                      Diameter (in.): 62  
 NYTMN (km.): 4861.187    NYTME (km.): 628.515    Building: 4
  
- Emission Point: 00057  
 Height (ft.): 79                      Diameter (in.): 62

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NYTMN (km.): 4861.184	NYTME (km.): 628.517	Building: 4
Emission Point: 00058		
Height (ft.): 80	Diameter (in.): 72	
NYTMN (km.): 4861.181	NYTME (km.): 628.52	Building: 4
Emission Point: 00059		
Height (ft.): 60	Diameter (in.): 36	
NYTMN (km.): 4861.178	NYTME (km.): 628.522	Building: 4
Emission Point: 00060		
Height (ft.): 81	Diameter (in.): 36	
NYTMN (km.): 4861.175	NYTME (km.): 628.526	Building: 4
Emission Point: 00061		
Height (ft.): 80	Length (in.): 58	Width (in.): 43
NYTMN (km.): 4861.174	NYTME (km.): 628.527	Building: 4
Emission Point: 00062		
Height (ft.): 80	Diameter (in.): 59	
NYTMN (km.): 4861.173	NYTME (km.): 628.529	Building: 4
Emission Point: 00063		
Height (ft.): 80	Diameter (in.): 59	
NYTMN (km.): 4861.178	NYTME (km.): 628.525	Building: 4
Emission Point: 00064		
Height (ft.): 81	Diameter (in.): 50	
NYTMN (km.): 4861.182	NYTME (km.): 628.523	Building: 4
Emission Point: 00065		
Height (ft.): 81	Length (in.): 60	Width (in.): 50
NYTMN (km.): 4861.184	NYTME (km.): 628.52	Building: 4
Emission Point: 00066		
Height (ft.): 81	Length (in.): 60	Width (in.): 50
NYTMN (km.): 4861.179	NYTME (km.): 628.528	Building: 4
Emission Point: 00067		
Height (ft.): 80	Diameter (in.): 60	
NYTMN (km.): 4861.177	NYTME (km.): 628.529	Building: 4

**Item 40.2(From Mod 0):**

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

Emission Unit: 0-WWTRT			
Emission Point: 00031			
Height (ft.): 25	Length (in.): 60	Width (in.): 24	
NYTMN (km.): 4861.262	NYTME (km.): 628.731		
Emission Point: 00035			

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Height (ft.): 24                      Diameter (in.): 36  
 NYTMN (km.): 4861.245      NYTME (km.): 628.71

Emission Point: 00046  
 Height (ft.): 36                      Diameter (in.): 4  
 NYTMN (km.): 4861.203      NYTME (km.): 628.659

Emission Point: 00128  
 Height (ft.): 182                      Diameter (in.): 6  
 NYTMN (km.): 4861.12      NYTME (km.): 628.57      Building: 35

**Item 40.3(From Mod 0):**

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

Emission Unit: B-PLANT

Emission Point: 00004  
 Height (ft.): 136                      Diameter (in.): 42  
 NYTMN (km.): 4861.034      NYTME (km.): 628.657

Emission Point: 00078  
 Height (ft.): 91                      Diameter (in.): 36  
 NYTMN (km.): 4861.022      NYTME (km.): 628.675      Building: 6

Emission Point: 00079  
 Height (ft.): 91                      Diameter (in.): 36  
 NYTMN (km.): 4861.028      NYTME (km.): 628.664      Building: 6

Emission Point: 00080  
 Height (ft.): 91                      Diameter (in.): 46  
 NYTMN (km.): 4861.025      NYTME (km.): 628.656      Building: 6

Emission Point: 00081  
 Height (ft.): 91                      Diameter (in.): 46  
 NYTMN (km.): 4861.025      NYTME (km.): 628.661      Building: 6

Emission Point: 00082  
 Height (ft.): 91                      Diameter (in.): 48  
 NYTMN (km.): 4861.02      NYTME (km.): 628.668      Building: 6

Emission Point: 00083  
 Height (ft.): 91                      Diameter (in.): 83  
 NYTMN (km.): 4861.018      NYTME (km.): 628.657      Building: 6

**Item 40.4(From Mod 1):**

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

Emission Unit: P-OWERH

Emission Point: 00044  
 Height (ft.): 205                      Diameter (in.): 155  
 NYTMN (km.): 4861.088      NYTME (km.): 628.756

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Emission Point: 00129  
 Height (ft.): 49 Diameter (in.): 6  
 NYTMN (km.): 4861.088 NYTME (km.): 628.756 Building: 29

**Item 40.5(From Mod 0):**

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

Emission Unit: P-ULPIN

Emission Point: 00084  
 Height (ft.): 81 Diameter (in.): 49  
 NYTMN (km.): 4861.051 NYTME (km.): 628.677 Building: 6

Emission Point: 00085  
 Height (ft.): 91 Diameter (in.): 60  
 NYTMN (km.): 4861.046 NYTME (km.): 628.672 Building: 6

Emission Point: 00086  
 Height (ft.): 35 Diameter (in.): 42  
 NYTMN (km.): 4861.038 NYTME (km.): 628.678 Building: 6

Emission Point: 00088  
 Height (ft.): 91 Diameter (in.): 6  
 NYTMN (km.): 4861.027 NYTME (km.): 628.696 Building: 6

Emission Point: 00089  
 Height (ft.): 68 Diameter (in.): 18  
 NYTMN (km.): 4861.083 NYTME (km.): 628.706 Building: 29

Emission Point: 00090  
 Height (ft.): 25 Diameter (in.): 12  
 NYTMN (km.): 4861.058 NYTME (km.): 628.702 Building: 6

Emission Point: 00091  
 Height (ft.): 68 Diameter (in.): 24  
 NYTMN (km.): 4861.063 NYTME (km.): 628.724 Building: 29

Emission Point: 00100  
 Height (ft.): 25 Length (in.): 36 Width (in.): 38  
 NYTMN (km.): 4861.03 NYTME (km.): 628.68 Building: 6

Emission Point: 00105  
 Height (ft.): 136 Diameter (in.): 22  
 NYTMN (km.): 4861.035 NYTME (km.): 628.663 Building: 6

Emission Point: 00106  
 Height (ft.): 201 Diameter (in.): 56  
 NYTMN (km.): 4861.052 NYTME (km.): 628.694 Building: 29

Emission Point: 00107  
 Height (ft.): 102 Diameter (in.): 30

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NYTMN (km.): 4861.044 NYTME (km.): 628.698 Building: 6

**Item 40.6(From Mod 0):**

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

Emission Unit: R-CAUST

Emission Point: 00005

Height (ft.): 80 Diameter (in.): 52  
 NYTMN (km.): 4860.957 NYTME (km.): 628.803

Emission Point: 00006

Height (ft.): 47 Diameter (in.): 18  
 NYTMN (km.): 4860.944 NYTME (km.): 628.799

Emission Point: 00008

Height (ft.): 40 Diameter (in.): 12  
 NYTMN (km.): 4860.933 NYTME (km.): 628.808

Emission Point: 00018

Height (ft.): 37 Diameter (in.): 6  
 NYTMN (km.): 4860.968 NYTME (km.): 628.802

Emission Point: 00019

Height (ft.): 31 Diameter (in.): 6  
 NYTMN (km.): 4860.977 NYTME (km.): 628.812

Emission Point: 00020

Height (ft.): 36 Diameter (in.): 6  
 NYTMN (km.): 4860.985 NYTME (km.): 628.82

Emission Point: 00043

Height (ft.): 60 Diameter (in.): 6  
 NYTMN (km.): 4860.968 NYTME (km.): 628.825

Emission Point: 00108

Height (ft.): 33 Diameter (in.): 12  
 NYTMN (km.): 4860.946 NYTME (km.): 628.828 Building: 19

Emission Point: 00109

Height (ft.): 35 Diameter (in.): 7  
 NYTMN (km.): 4860.958 NYTME (km.): 628.819 Building: 19

Emission Point: 00110

Height (ft.): 35 Diameter (in.): 7  
 NYTMN (km.): 4860.957 NYTME (km.): 628.834

Emission Point: 00111

Height (ft.): 50 Diameter (in.): 12  
 NYTMN (km.): 4860.955 NYTME (km.): 628.835

Emission Point: 00112

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Height (ft.): 50	Diameter (in.): 12	
NYTMN (km.): 4860.951	NYTME (km.): 628.836	
Emission Point: 00113		
Height (ft.): 37	Diameter (in.): 6	
NYTMN (km.): 4860.943	NYTME (km.): 628.827	
Emission Point: 00114		
Height (ft.): 30	Diameter (in.): 36	
NYTMN (km.): 4860.941	NYTME (km.): 628.826	
Emission Point: 00115		
Height (ft.): 32	Diameter (in.): 24	
NYTMN (km.): 4860.94	NYTME (km.): 628.826	Building: 19
Emission Point: 00117		
Height (ft.): 31	Diameter (in.): 18	
NYTMN (km.): 4860.935	NYTME (km.): 628.822	Building: 19
Emission Point: 00119		
Height (ft.): 10	Diameter (in.): 8	
NYTMN (km.): 4860.925	NYTME (km.): 628.817	Building: 19
Emission Point: 00121		
Height (ft.): 35	Diameter (in.): 7	
NYTMN (km.): 4860.926	NYTME (km.): 628.827	Building: 19
Emission Point: 00123		
Height (ft.): 39	Length (in.): 1	Width (in.): 3
NYTMN (km.): 4860.94	NYTME (km.): 628.812	Building: 19
Emission Point: 00124		
Height (ft.): 25	Diameter (in.): 36	
NYTMN (km.): 4860.956	NYTME (km.): 628.828	Building: 19
Emission Point: 00126		
Height (ft.): 47	Diameter (in.): 8	
NYTMN (km.): 4860.96	NYTME (km.): 628.82	

**Item 40.7(From Mod 0):**

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

Emission Unit: R-ECOV B

Emission Point: 00001		
Height (ft.): 200	Diameter (in.): 74	
NYTMN (km.): 4861.082	NYTME (km.): 628.789	Building: 29
Emission Point: 00003		
Height (ft.): 169	Diameter (in.): 42	
NYTMN (km.): 4861.059	NYTME (km.): 628.773	



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Emission Point: 00103  
 Height (ft.): 200 Diameter (in.): 108  
 NYTMN (km.): 4861.1 NYTME (km.): 628.782 Building: 29

**Item 40.8(From Mod 1):**

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

Emission Unit: W-OODYD

Emission Point: 00011  
 Height (ft.): 47 Diameter (in.): 44  
 NYTMN (km.): 4860.959 NYTME (km.): 628.741

Emission Point: 00017  
 Height (ft.): 43 Diameter (in.): 29  
 NYTMN (km.): 4860.952 NYTME (km.): 628.738

Emission Point: 00068  
 Height (ft.): 31 Diameter (in.): 44  
 NYTMN (km.): 4860.912 NYTME (km.): 628.789 Building: 16

Emission Point: 00069  
 Height (ft.): 31 Diameter (in.): 44  
 NYTMN (km.): 4860.886 NYTME (km.): 628.823 Building: 54

Emission Point: 00070  
 Height (ft.): 31 Diameter (in.): 44  
 NYTMN (km.): 4860.891 NYTME (km.): 628.797 Building: 16

Emission Point: 00071  
 Height (ft.): 31 Diameter (in.): 17  
 NYTMN (km.): 4860.871 NYTME (km.): 628.825 Building: 54

Emission Point: 00099  
 Height (ft.): 31 Diameter (in.): 17  
 NYTMN (km.): 4860.864 NYTME (km.): 628.812 Building: 54

**Condition 41: Process Definition By Emission Unit**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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

**Item 41.1(From Mod 2):**

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

Emission Unit: R-CAUST  
 Process: 115 Source Classification Code: 3-07-001-06  
 Process Description:

The lime kiln converts lime mud to burnt lime through a process called "calcining". The lime kiln burns natural gas, #2 fuel oil and/or #6 fuel oil. Propane or natural gas are used for startup and process stabilization.

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Emission Source/Control: 10077 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 10005 - Process

**Item 41.2(From Mod 0):**

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

Emission Unit: 0-PAPER

Process: 119

Source Classification Code: 3-07-013-99

Process Description:

The paper mill converts pulp to various finished products via nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Emission Source/Control: 10041 - Process

Emission Source/Control: 10047 - Process

Emission Source/Control: 10048 - Process

Emission Source/Control: 10049 - Process

Emission Source/Control: 10050 - Process

Emission Source/Control: 10051 - Process

Emission Source/Control: 10052 - Process

Emission Source/Control: 10053 - Process

Emission Source/Control: 10054 - Process

Emission Source/Control: 10055 - Process

Emission Source/Control: 10056 - Process

Emission Source/Control: 10057 - Process

Emission Source/Control: 10058 - Process

Emission Source/Control: 10059 - Process

Emission Source/Control: 10060 - Process

Emission Source/Control: 10061 - Process

Emission Source/Control: 10062 - Process

Emission Source/Control: 10063 - Process

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Emission Source/Control: 10064 - Process

Emission Source/Control: 10065 - Process

Emission Source/Control: 10066 - Process

Emission Source/Control: 10067 - Process

**Item 41.3(From Mod 0):**

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

Emission Unit: 0-WWTRT

Process: 122

Source Classification Code: 3-07-001-21

Process Description:

The wastewater treatment process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration and sludge dewatering and disposal.

Emission Source/Control: 10031 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10033 - Control

Control Type: WET SCRUBBER, VENTURI SCRUBBER

Emission Source/Control: 10032 - Process

Design Capacity: 40,000 gallons

Emission Source/Control: 10035 - Process

Emission Source/Control: 10046 - Process

Emission Source/Control: 10127 - Process

**Item 41.4(From Mod 0):**

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

Emission Unit: B-PLANT

Process: 116

Source Classification Code: 3-07-001-15

Process Description:

The bleach plant whitens brown pulp for paper production.

Emission Source/Control: 10094 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10004 - Process

**Item 41.5(From Mod 0):**

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

Emission Unit: B-PLANT

Permit ID: 5-1548-00008/00081

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Process: 117 Source Classification Code: 3-07-001-15

Process Description:

Processes that do not vent to the bleach plant scrubber include: the second bleaching stage (#20 tower), the fourth bleaching stage (#40 tower) and four bleached pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission Source/Control: 10078 - Process

Emission Source/Control: 10079 - Process

Emission Source/Control: 10080 - Process

Emission Source/Control: 10081 - Process

Emission Source/Control: 10082 - Process

Emission Source/Control: 10083 - Process

**Item 41.6(From Mod 1):**

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

Emission Unit: P-OWERH

Process: 106 Source Classification Code: 1-02-004-01

Process Description:

Firing No. 6 fuel oil or waste fuel type "A" in the power boiler.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control

Control Type: ELECTROSTATIC PRECIPITATOR

**Item 41.7(From Mod 1):**

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

Emission Unit: P-OWERH

Process: 107 Source Classification Code: 1-02-009-02

Process Description:

Firing bark and wood in the power boiler. The bark/wood firing rate shall not exceed 450 wet tons per day.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Source/Control: 10072 - Control  
 Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
 Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control  
 Control Type: ELECTROSTATIC PRECIPITATOR

**Item 41.8(From Mod 1):**

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

Emission Unit: P-OWERH  
 Process: 108 Source Classification Code: 1-02-009-02  
 Process Description:

The power boiler firing dewatered secondary biosolids produced in the on-site wastewater treatment plant. The dewatered secondary biosolids shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) dewatered biosolids with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered biosolids fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of dewatered biosolids to the woodyard.

Emission Source/Control: 10044 - Combustion  
 Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
 Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
 Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control  
 Control Type: ELECTROSTATIC PRECIPITATOR

**Item 41.9(From Mod 1):**

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

Emission Unit: P-OWERH  
 Process: 109 Source Classification Code: 1-02-009-02  
 Process Description:

Firing primary clarifier fiber in the power boiler. The dewatered primary clarifier fiber shall be mixed with the wood/bark fuel in the woodyard prior to feeding to the bark hogger according to the following procedure: Mix one front end loader bucket (3 cubic yards) fiber with a

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minimum of 30 cubic yards of wood/bark. The total quantity of dewatered primary clarifier fiber fed to the boiler shall not exceed 40 cubic yards per day.

Emission Source/Control: 10044 - Combustion  
 Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
 Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
 Control Type: SODIUM-ALKALI SCRUBBING

**Item 41.10(From Mod 1):**

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

Emission Unit: P-OWERH  
 Process: 111 Source Classification Code: 1-02-007-99  
 Process Description:

Non-condensable gases (NCGs) recovered by the pulping and chemical recovery processes are treated by thermal oxidation in the power boiler. The NCGs are collected by a network of fans and piping and fed to the power boiler.

Emission Source/Control: 10044 - Combustion  
 Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
 Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
 Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control  
 Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 11075 - Process

**Item 41.11(From Mod 1):**

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

Emission Unit: P-OWERH  
 Process: 113 Source Classification Code: 1-02-009-02  
 Process Description:

Firing rejected digester knots in the power boiler. The knots shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) knots with a minimum of 30 cubic yards of wood/bark. The total quantity of knots fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and

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volume of each delivery of knots to the woodyard.

Emission Source/Control: 10044 - Combustion  
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
Control Type: SODIUM-ALKALI SCRUBBING

**Item 41.12(From Mod 1):**

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

Emission Unit: P-OWERH  
Process: 125 Source Classification Code: 1-02-006-01  
Process Description: Firing natural gas in the power boiler.

Emission Source/Control: 10044 - Combustion  
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 41.13(From Mod 1):**

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

Emission Unit: P-OWERH  
Process: 126 Source Classification Code: 1-02-005-01  
Process Description: Firing #2 fuel oil in the power boiler.

Emission Source/Control: 10044 - Combustion  
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control  
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10074 - Control  
Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: W-ESP - Control  
Control Type: ELECTROSTATIC PRECIPITATOR

**Item 41.14(From Mod 0):**

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

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Emission Unit: P-ULPIN

Process: 120

Source Classification Code: 3-07-001-99

Process Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulping and washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for chemical recovery in the recovery furnace. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA.

Emission Source/Control: 10084 - Process

Emission Source/Control: 10085 - Process

Emission Source/Control: 10086 - Process

Emission Source/Control: 10088 - Process

Emission Source/Control: 10089 - Process

Emission Source/Control: 10090 - Process

Emission Source/Control: 10091 - Process

Emission Source/Control: 10095 - Process

Emission Source/Control: 10096 - Process

Emission Source/Control: 10097 - Process

Emission Source/Control: 10098 - Process

Emission Source/Control: 10100 - Process

Emission Source/Control: 10105 - Process

Emission Source/Control: 10106 - Process

Emission Source/Control: 10107 - Process

**Item 41.15(From Mod 0):**

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

Emission Unit: P-ULPIN

Process: 124

Source Classification Code: 3-07-001-99

Process Description:



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Venting non-condensable gases to the atmosphere from the non-condensable gas collection system.

Emission Source/Control: 10107 - Process

**Item 41.16(From Mod 0):**

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

Emission Unit: R-CAUST

Process: 114

Source Classification Code: 3-07-001-22

Process Description:

The recausticizing area clarifies green liquor from the smelt dissolving tank, produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers, and clarifies white liquor slurry producing white liquor for use in the digester.

Emission Source/Control: 10125 - Control  
Control Type: WET SCRUBBER

Emission Source/Control: 10006 - Process

Emission Source/Control: 10008 - Process

Emission Source/Control: 10018 - Process

Emission Source/Control: 10019 - Process

Emission Source/Control: 10020 - Process

Emission Source/Control: 10043 - Process

Emission Source/Control: 10076 - Process

Emission Source/Control: 10108 - Process

Emission Source/Control: 10109 - Process

Emission Source/Control: 10110 - Process

Emission Source/Control: 10111 - Process

Emission Source/Control: 10112 - Process

Emission Source/Control: 10113 - Process

Emission Source/Control: 10114 - Process

Emission Source/Control: 10115 - Process

Emission Source/Control: 10117 - Process

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Emission Source/Control: 10119 - Process

Emission Source/Control: 10121 - Process

Emission Source/Control: 10123 - Process

Emission Source/Control: 10124 - Process

Emission Source/Control: 10126 - Process

**Item 41.17(From Mod 1):**

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

Emission Unit: R-ECOV B

Process: 103

Source Classification Code: 3-07-001-10

Process Description:

Babcock and Wilcox recovery furnace fired on black liquor.

Emission Source/Control: 10101 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10104 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10001 - Process

**Item 41.18(From Mod 0):**

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

Emission Unit: R-ECOV B

Process: 104

Source Classification Code: 1-02-004-01

Process Description:

Babcock and Wilcox recovery furnace fired on #6 fuel oil.

Emission Source/Control: 10101 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10104 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10001 - Process

**Item 41.19(From Mod 0):**

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

Emission Unit: R-ECOV B

Process: 105

Source Classification Code: 3-07-001-05

Process Description:

Smelt dissolving tank where smelt from a recovery furnace



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Emission Source/Control: 10017 - Control  
Control Type: SINGLE CYCLONE

Emission Source/Control: 10068 - Process

**Condition 42: Bleaching Systems - Closed-vent System and Control Device Requirements**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:40CFR 63.445(b), Subpart S**

**Item 42.1:**

This Condition applies to Emission Unit: B-PLANT

**Item 42.2:**

The equipment at each bleaching stage where chlorinated compounds are introduced shall be enclosed and vented into a closed vent system and routed to a control device that meets one or more of the requirements in conditions under §63.445(c). The enclosures and closed vent system shall meet the requirements specified in conditions under §63.450.

**Condition 43: Compliance Certification**  
Effective between the dates of 03/19/2017 and 03/18/2022

**Applicable Federal Requirement:40CFR 63.445(c)(2), Subpart S**

**Item 43.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

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

**Item 43.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control device used to reduce chlorinated HAP emissions shall achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP. Emission testing to verify compliance with this standard will be performed by September 7, 2015 and thereafter within 60 months from the date of the previous performance test unless additional testing is required by the permitting authority. In addition to state reporting requirements, results of the performance test must be submitted to EPA and meet the reporting requirements of 40 CFR 63.455(h). The test shall measure the treatment outlet device concentration of either:

- 1) chlorine using EPA Method 26A as modified by

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40CFR63.457(b)(5)(ii) or  
 2) the sum of all individual chlorinated HAPs  
 using a method that has been demonstrated to the USEPA  
 administrator's satisfaction.

Parameter Monitored: CHLORINE  
 Upper Permit Limit: 10 parts per million (by volume)  
 Reference Test Method: 40CFR60 Method 26A  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
 DESCRIPTION  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
 METHOD INDICATED  
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 44: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.450(d), Subpart S**

**Item 44.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

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

**Item 44.2:**  
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §63.445 shall comply with either of the following requirements:

- 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. This will consist of a pressure indicator with a maximum pressure of 2 inches of water; or
- 2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or





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**Item 47.1:**

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Process: 116

Emission Source: 10094

Regulated Contaminant(s):

CAS No: 007782-50-5 CHLORINE

**Item 47.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

IP Ticonderoga uses an alternative monitoring system in lieu of the requirement to operate a continuous monitoring system to measure the scrubber vent gas inlet flow. The vent gas flowrate is monitored by the use of two zero speed switches on the scrubber induced draft fan. The fan must be in continuous operation. Corrective action must be implemented any time the scrubber fan is not operational.

Downtime of the scrubber induced draft fan and zero speed switches will be reported as part of the semi-annual MACT report.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-2: Compliance Certification**

**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 200.6**

**Item 1-2.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

**Item 1-2.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This unit's annual electrical output supplied to the electric grid shall be less than or equal to 10 percent of the gross annual electrical output of the unit. This makes the unit exempt from the requirements of Part 242, except for the provisions of section 242-1.2, section



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242-1.3, section 242-1.4 and section 242-1.6 as well as the requirements of Part 251.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 49: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 225-1.6 (a)**

**Item 49.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

**Item 49.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall submit a written report to the Department quarterly. These quarterly reports shall include:

- a. a summary of all emission limit violations;
- b. a summary of CEM operations, including downtime and out-of-control periods;
- c. a summary of quarterly audit results;
- d. descriptions of any significant changes in the process, control equipment or CEM system; and
- e. the time and date each scrubber cleaning commences and ends;
- f. the chemical makeup and quantity of the acid solution used in the cleaning process;
- g. a description of any planned scrubber modifications and any updates to the scrubber cleaning protocol since the previous quarterly report;
- h. the maximum rolling 3-hour and 24-hour average SO<sub>2</sub> emissions resulting from the scrubber cleaning (3-hour rolling averages in excess of 435 pounds per hour and 24-hour rolling averages in excess of 309 pounds per hour shall be reported as excess emissions)

Conditions a. through d. are based on the special conditions of the PSD permit issued in August 1995.

Conditions e. through h. are based on Schedule A of Order on Consent # R5-2265-98-07.

For the purposes of this permit, excess emissions

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indicated by the CEM system of SO<sub>2</sub> or NO<sub>x</sub> other than startups, shutdowns and malfunctions (as defined in 40CFR60, Subpart A) are considered violations of the applicable emission limits. The quarterly report shall be in the format given in Section 10 of NYSDEC's Air Guide 34. Equivalent formats may be accepted, subject to the review and approval of the Department.

The facility shall maintain a file of all measurements, daily zero and span checks, CEM system performance evaluations and repairs and maintenance to the system for a period of five years from the date of occurrence. These records must be available for inspection by Department personnel during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 50: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 225-2.3 (b) (1)**

**Item 50.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

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

**Item 50.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the power boiler as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification

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to the permit.

Waste oil generated on site (lubricating, hydraulic and parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not contaminated with chemical waste,  
 Combustion efficiency testing is performed within 60 days of first use of waste oil,  
 the quantity does not exceed 10,000 gallons per year and,  
 the waste oil is blended with #6 oil at a ratio of not more than 1 gallon waste oil to 100 gallons #6 oil.

Quantities of waste oil used must be recorded on each date it is blended with the #6 oil and the records maintained at the facility.

Parameter Monitored: COMBUSTION EFFICIENCY

Lower Permit Limit: 99 percent

Reference Test Method: method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 51: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 227-1.2**

**Item 51.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 51.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

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The firing rate of bark and wood shall not exceed the rate demonstrated during the last particulate compliance test. The current limit is 450 wet tons per day. Dewatered secondary biosolids, rejected wood knots or primary clarifier fiber may be substituted for wood or bark at the ratio of 1 part alternative fuel to 10 parts wood or bark - not to exceed the daily maximum of 40 cubic yards for any one alternative fuel. A log shall be maintained on-site which indicates the date and volume of each delivery of alternative fuel to the woodyard.

Parameter Monitored: WOOD  
 Upper Permit Limit: 450 tons per day  
 Monitoring Frequency: DAILY  
 Averaging Method: 24-HOUR MAXIMUM - NOT TO BE EXCEEDED MORE THAN ONCE PER CALENDAR YEAR  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 4/30/2017.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 52: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 227-1.2 (a) (3)**

**Item 52.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):  
 CAS No: 0NY075-00-0 PARTICULATES

**Item 52.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING  
 Monitoring Description:

Emissions of particulates shall not exceed a rate of 0.10 pounds per million Btus. Stack testing to demonstrate compliance with this limit will be performed once during the permit term unless additional testing is required by the permitting authority.

Parameter Monitored: PARTICULATES  
 Upper Permit Limit: 0.10 pounds per million Btus  
 Reference Test Method: method 5  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

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Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 53: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 227-2.5 (c)**

**Item 53.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

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

**Item 53.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance.

Per the NOx RACT determination submitted in September 2016, the emission limit for the power boiler during the ozone season (1 May through 30 September) is 0.23 lbs of NOx emissions per mmBtu. This limit applies for all periods except during the first 24 hours of startup. Compliance with this limit shall be determined on a 24-hour average. This limit does not apply on days when natural gas supply is curtailed or interrupted. Additionally, NOx emissions must not exceed a 0.22 lb/per mmBtu based on a 30 day rolling average during the ozone season.

From October 1 to April 30, the non-ozone season, the limit is 0.23 lbs of NOx per mmBtu on a 30 day rolling average.

The NOx CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Compliance with the new NOx limit will also satisfy NOx emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

Manufacturer Name/Model Number: Thermo Environmental Model 42iLS

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.23 pounds per million Btus

Reference Test Method: PS-2

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 54: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63, Subpart DDDDD**

**Item 54.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

**Item 54.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must meet the requirements established under the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers. EPA has granted the facility a one year extension so the effective compliance date is January 31, 2017. This will also satisfy particulate emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

The permittee must submit periodic reports to EPA (Air Compliance Branch) that describe progress in implementing the project milestones that will enable the facility to achieve compliance by no later than January 31, 2017. The progress reports must be submitted on a quarterly basis with the first report due on May 15, 2015 and continue until the facility comes into compliance.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 55: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63, Subpart DDDDD**

**Item 55.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: 107

Emission Source: 10044

Regulated Contaminant(s):

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

CAS No: 007647-01-0 HYDROGEN CHLORIDE

**Item 55.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An existing boiler burning solid fuel is limited to an HCl emission limit of 0.022 pounds per million Btu. This limit is applicable at all times, except during startup and shutdown. Fuel sampling for chlorides must be conducted during the performance test.

Initial stack testing must be conducted using methods from Table 5 of Subpart DDDDD using the specified sampling volume for the test method chosen from Table 2 of Subpart DDDDD. Subsequent stack tests must be conducted annually (within 13 months of the previous test). Annual testing may be reduced to once every 3 years (no more than 37 months from the previous test) if two consecutive tests are below 75% of the stated limit.

Operating limitations from table 7 of Subpart DDDDD will be established during the initial compliance test.

Results of performance testing must be reported within 60 days of test completion.

Compliance reports must be filed on a semi-annual basis. First compliance report is due by October 31, 2017 for the reporting period January 31, 2017 - September 2017. The next semi-annual report will be due by April 30, 2018 for the reporting period October 2017 - March 2018. The next semi-annual report will be due by October 31, 2018 for the reporting period April 2018 - September 2018. Subsequent semi-annual reports will follow the same reporting schedule.

Parameter Monitored: HYDROGEN CHLORIDE

Upper Permit Limit: 0.022 pounds per million Btus

Reference Test Method: Method 26A

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 56: Compliance Certification****Effective between the dates of 03/19/2017 and 03/18/2022****Applicable Federal Requirement: 40CFR 63, Subpart DDDDD****Item 56.1:**

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH  
Process: 107 Emission Source: 10044Regulated Contaminant(s):  
CAS No: 007439-97-6 MERCURY**Item 56.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

An existing boiler burning solid fuel is limited to a mercury emission limit of 0.0000057 pounds per million Btu. This limit is applicable at all times, except during startup and shutdown.

Initial stack testing must be conducted using methods from Table 5 of Subpart DDDDD using the specified sampling volume for the test method chosen from Table 2 of Subpart DDDDD. Subsequent stack tests must be conducted annually (within 13 months of the previous test). Annual testing may be reduced to once every 3 years (no more than 37 months from the previous test) if two consecutive tests are below 75% of the stated limit.

Operating limitations from table 7 of Subpart DDDDD will be established during the initial compliance test.

Results of performance testing must be reported within 60 days of test completion.

Compliance reports must be filed on a semi-annual basis. First compliance report is due by October 31, 2017 for the reporting period January 31, 2017 - September 2017. The next semi-annual report will be due by April 30, 2018 for the reporting period October 2017 - March 2018. The next semi-annual report will be due by October 31, 2018 for the reporting period April 2018 - September 2018. Subsequent semi-annual reports will follow the same reporting schedule.

Parameter Monitored: MERCURY (HG 197)

Upper Permit Limit: 0.0000057 pounds per million Btus

Reference Test Method: Method 30B

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTIONAveraging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 57: Compliance Certification**







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Facility DEC ID: 5154800008

Subsequent reports are due every 6 calendar month(s).

**Condition 59: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.7540(a), Subpart DDDDD**

**Item 59.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: 107

Emission Source: 10044

**Item 59.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Boilers with maximum heat inputs greater than 10 mmBtu/hr without oxygen trim systems installed must perform an annual tune-up on the affected boiler. The tune-up must be performed according to the requirements of 40CFR 63.7540(a)(10). Subsequent tune-ups must be completed no more than 13 months after the previous tune-up. per 40CFR 63.7540(a)(10)(i), tune-up activities that require entry into the boiler can be delayed until the next scheduled shutdown.

Compliance reports must be filed on a semi-annual basis. First compliance report is due by October 31, 2017 for the reporting period January 31, 2017 - September 2017. The next semi-annual report will be due by April 30, 2018 for the reporting period October 2017 - March 2018. The next semi-annual report will be due by October 31, 2018 for the reporting period April 2018 - September 2018. Subsequent semi-annual reports will follow the same reporting schedule.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 60: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.443(d)(4), Subpart S**

**Item 60.1:**

The Compliance Certification activity will be performed for:

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Facility DEC ID: 5154800008

Emission Unit: P-OWERH  
Process: 111

**Item 60.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Non condensible gases from the pulping process shall be controlled by introducing them into the flame zone or with the combustion air of the power boiler. Venting gases to the atmosphere or to the boiler when it is not firing shall be reported in semi-annual NESHAP report.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 61: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

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

**Item 61.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044

**Item 61.2:**

Compliance Certification 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-six-minute period per hour of not more than 27 percent opacity.

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.

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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 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  
Reference Test Method: method 9  
Monitoring Frequency: DAILY  
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 1-3: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 227-2.4 (a) (1)**

**Item 1-3.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044

Regulated Contaminant(s):  
CAS No: 0NY210-00-0      OXIDES OF NITROGEN

**Item 1-3.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NO<sub>x</sub> emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance.

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During startup, NOx emissions shall not exceed 122 pounds per hour (24 hour block average) over the first 48 hours of operation. This emissions limit applies only during ozone season.

The NOx CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Manufacturer Name/Model Number: Thermo Environmental Model 42iLS

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 122 pounds per hour

Reference Test Method: PS-2

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2019.

Subsequent reports are due every 6 calendar month(s).

**Condition 63: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 52.21(k), Subpart A**

**Item 63.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044

Regulated Contaminant(s):  
 CAS No: 0NY075-00-0      PARTICULATES

**Item 63.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of particulates (measured by method 5) shall not exceed 0.11 lbs/mmBtu. Particulate emission testing shall be conducted once per permit term unless additional testing is required by the permitting authority. Emission testing shall be conducted in accordance with 6NYCRR Subpart 202-1.

Upper Permit Limit: 0.11 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Permit ID: 5-1548-00008/00081

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**Condition 64: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 52.21(k), Subpart A**

**Item 64.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044

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

**Item 64.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record SO2 emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. SO2 emissions shall not exceed 435 lb/hr (rolling 3 hour average).

The SO2 CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. Either a certified flow monitor or the most restrictive F-factor for the multiple fuel mix shall be used to measure stack flowrate.

Manufacturer Name/Model Number: Thermo Environmental 43 iHL

Upper Permit Limit: 435 pounds per hour

Reference Test Method: 40CFR60 Appx B PS2

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 65: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 52.21(k), Subpart A**

**Item 65.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044

Regulated Contaminant(s):

Permit ID: 5-1548-00008/00081

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CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 65.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record SO<sub>2</sub> emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. SO<sub>2</sub> emissions shall not exceed 309 lb/hr (rolling 24 hour average). This will also satisfy sulfur dioxide emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

The SO<sub>2</sub> CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. Either a certified flow monitor or the most restrictive F-factor for the multiple fuel mix shall be used to measure stack flowrate.

Manufacturer Name/Model Number: Thermo Environmental 43 iHL

Upper Permit Limit: 309 pounds per hour

Reference Test Method: 40CFR60 Appx B PS2

Monitoring Frequency: CONTINUOUS

Averaging Method: 24-HR ROLLING AVG., CALCULATED EA. HR  
AS THE AVG OF THE PAST 24 OPERATING  
HRS

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-4: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.7520, Subpart DDDDD**

**Item 1-4.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH	Emission Point: 00044
Process: 106	Emission Source: 10044

**Item 1-4.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An instrument capable of determining and recording the



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power boiler steaming rate at least once every successive 15 minute period must be installed. The steaming rate must be maintained at or below 600,000 pounds per hour (or the value achieved during the most recent stack test if reestablished) based on a 30 day rolling average during normal operation. Operation limits must be confirmed or reestablished during performance tests. \*\*This statement applies to all power boiler processes

Parameter Monitored: STEAM OUTPUT  
 Upper Permit Limit: 600000 pounds per hour  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 10/30/2019.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-5: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.7530(b), Subpart DDDDD**

**Item 1-5.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH	Emission Point: 00044
Process: 106	Emission Source: 10044

**Item 1-5.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The power boiler wet electrostatic precipitators total secondary power is calculated from secondary voltage and current. An instrument capable of determining and recording the power boiler wet electrostatic precipitator's secondary voltage and current rates at least once every successive 15 minute period must be installed according to 63.7525(h) and must be in continuous operation except for periods of monitoring system malfunctions, out of control periods and required system quality assurance or control activities. The total secondary power rate must be maintained at or above 27 kilowatts (or the value achieved during the most recent stack test if reestablished) based on a 720 hour rolling average during normal operation. Operation limits must be confirmed or reestablished during performance tests.  
 \*\*This statement applies to all power boiler processes

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Parameter Monitored: SECONDARY SPECIFIC POWER  
 Lower Permit Limit: 27 kilowatts  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 10/30/2019.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-6: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.7530(b), Subpart DDDDD**

**Item 1-6.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH	Emission Point: 00044
Process: 106	Emission Source: 10044

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

**Item 1-6.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The facility must continuously calculate and record SO2 emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. The SO2 CEMS must be installed according to 63.7525(m). The SO2 emissions must be maintained at or below 319 pounds per hour (or the value achieved during the most recent stack test if reestablished) based on a 30 day rolling average during normal operation. Operation limits must be confirmed or reestablished during performance tests. \*\*This statement applies to all power boiler processes

Parameter Monitored: SULFUR DIOXIDE  
 Upper Permit Limit: 319 pounds per hour  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 10/30/2019.  
 Subsequent reports are due every 6 calendar month(s).

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Facility DEC ID: 5154800008

**Condition 1-7: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.7530(b), Subpart DDDDD**

**Item 1-7.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH	Emission Point: 00044
Process: 106	Emission Source: 10044

**Item 1-7.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An instrument capable of determining and recording the power boiler scrubber liquid flow rate at least once every successive 15 minute period must be installed according to 63.7525(e) and must be in continuous operation except for periods of monitoring system malfunctions, out of control periods and required system quality assurance or control activities. The total average scrubber liquid flow rate must be maintained at or above 1000 gallons per minute (or the value achieved during the most recent stack test if reestablished) based on a 30 day rolling average during normal operation. Operation limits must be confirmed or reestablished during performance tests. \*\*This statement applies to all power boiler processes

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 1000 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING  
 DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2019.

Subsequent reports are due every 6 calendar month(s).

**Condition 1-8: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.7530(c), Subpart DDDDD**

**Item 1-8.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH	Emission Point: 00044
Process: 106	Emission Source: 10044

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Regulated Contaminant(s):  
 CAS No: 007782-50-5 CHLORINE

**Item 1-8.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The maximum chlorine input level shall not exceed 0.004536 pound per million BTU (or the value achieved during the most recent stack test) on a monthly basis. The maximum input level was established using the procedures outlined in 63.7530. \*\*This statement applies to all power boiler processes.

Parameter Monitored: CHLORINE  
 Upper Permit Limit: 0.004536 pounds per million Btus  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: CALENDAR MONTH TOTAL  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 10/30/2019.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 1-9: Compliance Certification**  
**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.7530(c), Subpart DDDDD**

**Item 1-9.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH                      Emission Point: 00044  
 Process: 106                                      Emission Source: 10044

Regulated Contaminant(s):  
 CAS No: 007439-97-6                      MERCURY

**Item 1-9.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The maximum mercury input level shall not exceed 2.04848E-07 pound per million BTU (or the value achieved during the most recent stack test) on a monthly basis. The maximum input level was established using the procedures outlined in 63.7530. \*\*This statement applies to all power boiler processes.

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Parameter Monitored: MERCURY (HG 197)  
Upper Permit Limit: 2.04848E-07 pounds per million Btus  
Monitoring Frequency: CONTINUOUS  
Averaging Method: CALENDAR MONTH TOTAL  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 10/30/2019.  
Subsequent reports are due every 6 calendar month(s).

**Condition 66: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.443(d), Subpart S**

**Item 66.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 66.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

HAP emissions from the digester system (LVHC system), evaporator system (LVHC system), knotter or screen system (HVLC system), pulp washing system (HVLC system), and weak liquor storage tank (HVLC system) shall be collected in a closed vent system and routed to the power boiler for thermal destruction 99% or more of the operating time; expressed as emission rate potential of total sulfur. The 1% allowance for uncontrolled venting of these equipment systems is more stringent than allowances authorized by 40 CFR 63.443(e) for LVHC and HVLC systems and is a requirement stemming from Consent Order #1743. The 1% allowance includes all venting resulting from startup, shutdown or periods of malfunction. Corrective action must be implemented when venting occurs.

When the power boiler is not in operation and exclusive of venting allowances, these HAP emissions must be diverted to an alternate control device which achieves at least 80% control or the pulping process must be stopped so that no HAP emissions are created. Diversion to the alternate control device will not exceed 1% of the time that the pulping process is in operation. This constitutes a system with greater than 99% overall control efficiency. 99% control efficiency is required under consent order #1743 executed on September 23, 1974.

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Control efficiency of the alternate control device shall be demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1.

Monitoring Frequency: CONTINUOUS  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 4/30/2017.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 67: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.446(e)(1), Subpart S**

**Item 67.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

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

**Item 67.2:**  
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Collect pulping process condensates from equipment systems listed in 40CFR63.446(b)(1) through (b)(5) that in total contain at least 11.1 pounds methanol per ton of oven dried pulp (40 CFR 63.446(c)(3) and treat the condensate by recycling it to the Number 2 brown stock washer shower water. The mass of pulping process condensate collected and recycled as shower water will be calculated daily and averaged over 15 days to determine compliance. This limit must be met at all times. Corrective action must be implemented any time the limit is not being met.

Parameter Monitored: METHYL ALCOHOL  
 Lower Permit Limit: 11.1 pounds per ton  
 Monitoring Frequency: DAILY  
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED  
 VALUE - SEE MONITORING DESCRIPTION  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 4/30/2017.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 68: Compliance Certification**

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement: 40CFR 63.450(d), Subpart S

**Item 68.1:**

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 68.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The permittee shall keep records of the monitored parameters for each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443, by complying with either of the following requirements:

- 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. Pressure, temperature, valve position and rupture disks are used as continuous indicators that gasses are not bypassing the NCG collection system. All measured bypasses are included in the Semi-annual MACT report.
- 2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. The valve or closure mechanism shall be inspected at least monthly to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

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**Condition 1-10: Compliance Certification**

**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 1-10.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

**Item 1-10.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

When lime kiln emissions exceed 4 ppm TRS (adjusted to 10% O<sub>2</sub>), supply 0.25 gallons per minute of caustic to the lime kiln scrubber. The permittee shall install, calibrate, operate and maintain a continuous monitor and data recorder for caustic flow rate. This is a requirement of consent order #1743 executed on September 23, 1974.

Parameter Monitored: VOLUMETRIC FLOW RATE

Upper Permit Limit: 0.25 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING  
DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-11: Compliance Certification**

**Effective between the dates of 05/28/2019 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 1-11.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR



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**Item 1-11.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of Total Reduced Sulfur (TRS) from the lime kiln shall not exceed 10 ppm or 0.7 pounds per hour (whichever is more restrictive) for more than 60 cumulative minutes per month. At maximum production rate, 0.7 pounds per hour is more restrictive and equates to 7 ppm corrected to 10% oxygen concentration. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system (CEMS) for lime kiln TRS emissions. CEMs must be in operation at all times except during calibration checks, adjustments, and periods of repair. This standard of performance shall not be applicable during a period of 24 hours immediately following commencement of start-up operations of the lime kiln. This is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Thermo Environmental 43i

Parameter Monitored: TOTAL REDUCED SULFUR

Upper Permit Limit: 0.7 pounds per hour

Reference Test Method: Method 40CFR60.284 modified

Monitoring Frequency: CONTINUOUS

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

Subsequent reports are due every 3 calendar month(s).

**Condition 2-1: Compliance Certification**  
**Effective between the dates of 01/21/2020 and 03/18/2022****Applicable Federal Requirement:6 NYCRR 212-3.1 (a)****Item 2-1.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

**Item 2-1.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in September 2016 determined that the lime kiln, as designed and operated, met NOx RACT. This is unchanged from the previous analysis. A nitrogen oxide emission limit of 120 parts per million by

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volume, wet, corrected to 10% oxygen content is established. Emission testing to verify compliance with this limit will be performed once during the permit term; unless additional testing is required by the permitting authority.

Parameter Monitored: OXIDES OF NITROGEN  
 Upper Permit Limit: 120 parts per million (by volume)  
 Reference Test Method: Method 7E  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 72: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 6 NYCRR 225-2.3 (b) (1)**

**Item 72.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST  
 Process: 115 Emission Source: 10005

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

**Item 72.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the lime kiln as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification to the permit.

Waste oil generated on site (lubricating, hydraulic and parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not

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contaminated with chemical waste,  
 Combustion efficiency testing is performed within 60 days  
 of first use of waste oil,  
 the quantity does not exceed 10,000 gallons per year  
 and,  
 the waste oil is blended with #6 oil at a ratio of not  
 more than 1 gallon waste oil to 100 gallons #6  
 oil.

Quantities of waste oil used must be recorded on each date  
 it is blended with the #6 oil and the records maintained  
 at the facility.

Parameter Monitored: COMBUSTION EFFICIENCY  
 Lower Permit Limit: 99 percent  
 Reference Test Method: method 10  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
 DESCRIPTION  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
 METHOD INDICATED  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 4/30/2017.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 73: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.864(k), Subpart MM**

**Item 73.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST  
 Process: 115 Emission Source: 10077

Regulated Contaminant(s):  
 CAS No: 0NY075-00-0 PARTICULATES

**Item 73.2:**  
 Compliance Certification shall include the following monitoring:

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

Monitoring Description:  
 An instrument capable of determining and recording the  
 lime kiln scrubber pressure drop at least once every  
 successive 15-minute period must be installed according to  
 manufacturer's specifications and must be in continuous  
 operation except during calibration checks, adjustments or  
 periods of repair. Unless ammended according to the  
 procedures in 63.864(j)(3), the average scrubber pressure

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drop must be maintained at or above 19.2 inches of water (or the value achieved during the most recent stack test) during each 3-hour averaging period except during periods of startup, shutdown or malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to startup, shutdown or malfunction, constitute a violation of the standard.

Corrective action must be implemented any time the 3-hour average pressure drop across the scrubber is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 19.2 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 74: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM**

**Item 74.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 74.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An instrument capable of determining and recording the lime kiln scrubber liquid flow rate at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber liquid flow rate must be maintained at or above 120 gallons per

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minute (or the value achieved during the most recent stack test) during each 3-hour averaging period except during periods of malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to an excusable malfunction, constitute a violation of the standard. Corrective action must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 120 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 75: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM**

**Item 75.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Emission Point: 00005

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 75.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from the lime kiln will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.15 grains per dry standard cubic foot corrected to 10% oxygen content; unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The lime kiln is also subject to a particulate matter limit under 6NYCRR 212. This limit is 0.15 grains per dry

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standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall apply in the event that the MACT limit is revised.

Parameter Monitored: PARTICULATES  
 Upper Permit Limit: 0.15 grains per dscf  
 Reference Test Method: method 5  
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED  
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 1-12: Compliance Certification**  
 Effective between the dates of 05/28/2019 and 03/18/2022

**Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)**

**Item 1-12.1:**  
 The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):  
 CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

**Item 1-12.2:**  
 Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)  
 Monitoring Description:

Emissions of total reduced sulfur from the recovery furnace shall not exceed 8 ppm (dry - corrected to 8% oxygen) for more than 60 cumulative minutes per day. This corresponds to 10 ppm before adjustment. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system for the recovery furnace emissions. CEMS must be in operation at all times except during calibration checks, adjustments and periods of repair. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations. A limit of 10 ppm is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Thermo Environmental 43i  
 Parameter Monitored: TOTAL REDUCED SULFUR  
 Upper Permit Limit: 8 parts per million (by volume)  
 Reference Test Method: 40CFR60.284 modified  
 Monitoring Frequency: CONTINUOUS  
 Averaging Method: AVERAGING METHOD - SEE MONITORING

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## DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

Subsequent reports are due every 3 calendar month(s).

**Condition 1-13: Compliance Certification****Effective between the dates of 05/28/2019 and 03/18/2022****Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)****Item 1-13.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

**Item 1-13.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of total reduced sulfur from the recovery furnace shall not exceed 4 ppm (dry - corrected to 8% oxygen) for a daily average. This corresponds to 5 ppm before adjustment. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations of the recovery furnace. A limit of 5 ppm is a requirement of consent order #1743 executed September 23, 1974.

Compliance with this limit demonstrates that the staged combustion air system is operating properly. This controls SO<sub>2</sub> formation as well and satisfies the SO<sub>2</sub> emission requirements under 6NYCRR part 249 (Best Available Retrofit Technology).

Manufacturer Name/Model Number: Thermo Environmental 43i

Parameter Monitored: TOTAL REDUCED SULFUR

Upper Permit Limit: 4 parts per million (by volume)

Reference Test Method: 40CFR60.284 modified

Monitoring Frequency: CONTINUOUS

Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN)

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

Subsequent reports are due every 3 calendar month(s).

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**Condition 78: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (b)**

**Item 78.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

**Item 78.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Limit oil use to less than 10% of the total fuel burned in the recovery boiler based on heat input. 10% of heat input is 371,000 mmBtu/yr which equates to 2,470,000 gallons of oil.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL OIL

Parameter Monitored: FUEL OIL

Upper Permit Limit: 2470 thousand gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 79: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:6 NYCRR 212-3.1 (a)**

**Item 79.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Regulated Contaminant(s):

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

**Item 79.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in September 2016 concluded



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that the recovery boiler as it was designed and operated met NOx RACT. This is unchanged from the previous analysis. A standard of 100 ppm<sub>dv</sub> corrected to 8% O<sub>2</sub> is established and emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority. This will also satisfy nitrogen oxide emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 100 parts per million (by volume)

Reference Test Method: Method 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 80: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM**

**Item 80.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 80.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Normal operation while firing black liquor is with all three precipitator cells in service. If the north and/or south cells are out of service, the rolling three hour average liquor firing rate is limited to 1450 pounds per minute of black liquor solids (or the value achieved during the most recent stack test). Stack testing for particulate emissions will be required once per permit term unless additional testing is required by the permitting authority.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: LIQUOR

Upper Permit Limit: 1450 pounds per minute

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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 81: Compliance Certification**

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

**Item 81.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 81.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Normal operation while firing black liquor is with all three precipitator cells in service. If the east cell (source 10104) is out of service, the rolling three hour average liquor firing rate is limited to 1200 pounds per minute of black liquor solids (or the value achieved during the most recent stack test). Stack testing for particulate emissions will be required once per permit term unless additional testing is required by the permitting authority.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: LIQUOR

Upper Permit Limit: 1200 pounds per minute

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 82: Compliance Certification**

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

**Item 82.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 82.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from the recovery furnace will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.03 grains per dry standard cubic foot corrected to 8% oxygen content; unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The recovery furnace is also subject to a particulate matter limit under 6NYCRR 212-2.4. This limit is 0.05 grains per dry standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall apply in the event that the MACT limit is revised. This will also satisfy particulate emission requirements under 6NYCRR Part 249 (Best Available Retrofit Technology).

Upper Permit Limit: 0.03 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 83: Compliance Certification**

Effective between the dates of 03/19/2017 and 03/18/2022

Applicable Federal Requirement: 40CFR 63.864(d), Subpart MM

**Item 83.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

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Facility DEC ID: 5154800008

Process: 103

Emission Source: 10001

**Item 83.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A system for monitoring and recording the opacity of the recovery furnace discharge must be installed in each recovery furnace stack. This system must meet the performance, installation and quality assurance requirements outlined in 63.864(d) and 40CFR60 Appendix B PS-1. For all periods of recovery furnace operation, the COMS must be in continuous operation except during calibration checks, zero or span adjustments, or periods of monitor system repair.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 84: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.864(k), Subpart MM**

**Item 84.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

**Item 84.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The owner or operators of an existing kraft recovery boiler equipped with an ESP are in violation of the standards of 63.862 when the combined opacity of the two stacks is greater than 35% for 6 percent or more of the operating time within any quarterly period. Combined opacity exceeds 35% when the average of the two stacks is equal to or greater than 20%.

Periodic reporting must follow the requirements for MACT Subpart MM sources contained elsewhere in this permit.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent



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Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

**Item 86.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must notify the Administrator before the black liquor solids firing rate for the recovery furnace during any 24 hour period is increased by more than 10% above the level measured during the most recent performance test.

Monitoring Frequency: DAILY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 87: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement:40CFR 63.862(a)(ii), Subpart MM**

**Item 87.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10003

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 87.2:**

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions discharged to the atmosphere from the smelt dissolving tank will be tested once per permit term unless additional testing is required by the permitting authority. The measured particulate concentration must be less than or equal to 0.15 grains per dry standard cubic foot unless the limits for the chemical recovery system (lime kiln, recovery furnace and smelt dissolving tank) are revised according to the procedures specified in Subpart MM.

The smelt dissolving tank is also subject to a particulate matter limit under 6NYCRR Part 212. This limit is 0.15 grains per dry standard cubic foot of exhaust gas. The more restrictive of the state or federal limits shall

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apply in the event that the MACT limit is revised.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 88: Compliance Certification**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM**

**Item 88.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10102

**Item 88.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An instrument capable of determining and recording the smelt dissolving tank scrubber pressure drop at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber pressure drop must be maintained at or above 5.4 inches of water (or the value achieved during the most recent stack test) during each 3-hour averaging period except during periods of startup, shutdown or malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to startup, shutdown or malfunction, constitute a violation of the standard.

Corrective action must be implemented any time the 3-hour average pressure drop across the scrubber is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 5.4 inches of water

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Monitoring Frequency: CONTINUOUS  
Averaging Method: 3-HOUR ROLLING AVERAGE  
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

**Condition 89: Compliance Certification**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM**

**Item 89.1:**

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10102

**Item 89.2:**

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

An instrument capable of determining and recording the smelt dissolving tank scrubber liquid flow rate at least once every successive 15-minute period must be installed according to manufacturer's specifications and must be in continuous operation except during calibration checks, adjustments or periods of repair. Unless amended according to the procedures in 63.864(j)(3), the average scrubber liquid flow rate must be maintained at or above 11.2 gallons per minute (or the value achieved during the most recent stack test) during each 3-hour averaging period except during periods of malfunction.

Only one exceedence will be counted during any 24-hour period. Six or more exceedences of pressure drop and/or scrubber liquid flow rate during any 6-month reporting period, not attributed to an excusable malfunction, constitute a violation of the standard. Corrective action must be implemented any time the 3-hour average scrubber liquid flow rate is below the value established during the performance tests. Periodic reporting must follow the requirements outlined for MACT Subpart MM sources located elsewhere in the permit.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 11.2 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR ROLLING AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 4/30/2017.  
Subsequent reports are due every 6 calendar month(s).

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**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: 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

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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 applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.**

**Condition 90: Contaminant List**

**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable State Requirement:ECL 19-0301**

**Item 90.1:**

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

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

CAS No: 007439-97-6  
Name: MERCURY

CAS No: 007446-09-5  
Name: SULFUR DIOXIDE

CAS No: 007647-01-0  
Name: HYDROGEN CHLORIDE

CAS No: 007782-50-5  
Name: CHLORINE

CAS No: 0NY075-00-0  
Name: PARTICULATES

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

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

CAS No: 0NY500-00-0  
Name: TOTAL REDUCED SULFUR

**Condition 91: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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

**Item 91.1:**

(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 24: Air pollution prohibited**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

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**Applicable State Requirement:6 NYCRR 211.1**

**Item 24.1:**

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 92: Compliance Demonstration**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable State Requirement:6 NYCRR 225-1.5 (c)**

**Item 92.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH

**Item 92.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Measurements must be made daily of the rate of each fuel burned. The gross heat content and ash content of oil and wood burned must be determined at least once each week.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 6 calendar month(s).

**Condition 93: Compliance Demonstration**  
**Effective between the dates of 03/19/2017 and 03/18/2022**

**Applicable State Requirement:6 NYCRR 225-1.4 (a)**

**Item 93.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Process: 106

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 93.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may purchase and burn number 6 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions.  
SO<sub>2</sub> emissions in pounds per million Btu must be less than the amount calculated by the following:  $SO_2 = (0.55 \text{ times the percent of total heat input provided by oil} + 3.4 \text{ times the percent of total heat input provided by wood}) \text{ divided by } 100$ . This is monitored daily on a 30 day rolling average.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 3 calendar month(s).

**Condition 94: Compliance Demonstration****Effective between the dates of 03/19/2017 and 03/18/2022****Applicable State Requirement: 6 NYCRR 225-1.4 (a)****Item 94.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-OWERH

Process: 126

Regulated Contaminant(s):

CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 94.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility may purchase and burn number 2 fuel oil with a sulfur content greater than allowed under 225-1.2 under the following conditions.  
SO<sub>2</sub> emissions in pounds per million Btu must be less than the amount calculated by the following:  $SO_2 = (0.00165 \text{ times the percent of total heat input provided by oil} +$

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3.4 times the percent of total heat input provided by wood) divided by 100. This is monitored daily on a 30 day rolling average.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

Subsequent reports are due every 3 calendar month(s).

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