UNDER THE ENVIRONMENTAL CONSERVATION LAW  (ECL)  

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-5330-00015/00029
Effective Date: 10/30/2017 Expiration Date: 10/29/2027

Permit Issued To: IRVING CONSUMER PRODUCTS INC
300 UNION ST
SAINT JOHN, NB E2L 4Z2

Contact: THOMAS NASH
IRVING TISSUE INC
1 EDDY ST
FORT EDWARD, NY 12828
(518) 747-4151

Facility: IRVING TISSUE FT EDWARD OPERATIONS
1 EDDY ST
FORT EDWARD, NY 12828

Description:
The Irving Tissue Fort Edward facility is a paper manufacturing facility. Principal facility components include a boiler, a pulp preparation process, paper machines, winders, rewinders and related converting equipment. The paper machines constitute continuous web operations. Virgin and recycled fiber is formed into continuous sheet products by the paper machines and then dried to form the product. The product may be further processed by the rewinders before being sent to converting areas where various consumer products such as facial tissue, bath tissue, paper napkins and paper towels are produced.

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: KEVIN R BLISS
NYSDEC - WARRENSBURG SUBOFFICE
232 GOLF COURSE RD
WARRENSBURG, NY 12885-1172

Authorized Signature: _____________________________ Date: ___ / ___ / _____
Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

DEC GENERAL CONDITIONS

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

Facility Level
Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG
DEC GENERAL CONDITIONS

***** General Provisions *****

GENERAL CONDITIONS - Apply to ALL Authorized Permits.

Condition 1: Facility Inspection by the Department

Applicable State Requirement: ECL 19-0305

Item 1.1:
The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

Item 1.2:
The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

Item 1.3:
A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

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

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

Item 2.1:
Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:
The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

Item 3.2:
The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 3.3
Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.
Condition 4: Permit modifications, suspensions or revocations by the Department

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:
The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

a) materially false or inaccurate statements in the permit application or supporting papers;

b) failure by the permittee to comply with any terms or conditions of the permit;

c) exceeding the scope of the project as described in the permit application;

d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;

e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**** Facility Level ****

Condition 5: Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG

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 Sub-office
Division of Environmental Permits
232 Golf Course Road
Warrensburg, NY 12885-1172
(518) 623-1281
Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: IRVING CONSUMER PRODUCTS INC
300 UNION ST
SAINT JOHN, NB E2L 4Z2

Facility: IRVING TISSUE FT EDWARD OPERATIONS
1 EDDY ST
FORT EDWARD, NY 12828

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

Permit Effective Date: 10/30/2017
Permit Expiration Date: 10/29/2027
LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

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*2 6 NYCRR 201-7.1: Capping Monitoring Condition
*3 6 NYCRR 201-7.1: Capping Monitoring Condition
4 6 NYCRR 211.1: Air pollution prohibited
5 6 NYCRR 212-2.1 (b): Compliance Demonstration
6 40CFR 60.48c(c), NSPS Subpart Dc: Compliance Demonstration
7 40CFR 60.48c(g), NSPS Subpart Dc: Compliance Demonstration
8 40CFR 63, Subpart JJJJJJ: Applicability

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9 6 NYCRR 227-1.3 (a): Compliance Demonstration
10 40CFR 60.42c(d), NSPS Subpart Dc: Compliance Demonstration
11 40CFR 60.44c(g), NSPS Subpart Dc: Compliance Demonstration
12 40CFR 60.47c(f), NSPS Subpart Dc: Emission monitoring for particulate matter
13 40CFR 60.48c(e)(11), NSPS Subpart Dc: Compliance Demonstration

EU=U-BOILR
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15 6 NYCRR 212-1.6 (a): Compliance Demonstration
16 6 NYCRR 212-2.4 (b): Compliance Demonstration
17 6 NYCRR 228-2.4 (a): Compliance Demonstration
18 6 NYCRR 234.6: Compliance Demonstration
19 6 NYCRR 234.7: Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

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22 6 NYCRR Subpart 201-5: Emission Unit Definition
23 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
24 6 NYCRR 201-5.3 (c): Compliance Demonstration
25 6 NYCRR 211.2: Visible Emissions Limited

Emission Unit Level
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27 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

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28 6 NYCRR 225-1.2 (h): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.
FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

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

Item A: Sealing - 6 NYCRR 200.5
The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.
Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6
Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

Item C: Maintenance of Equipment - 6 NYCRR 200.7
Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,
required to operate such device effectively.

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

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

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

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

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial
Activities - 6 NYCRR 201-3.3 (a)
The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item I: Required Emission Tests - 6 NYCRR 202-1.1
An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

Item J: Open Fires Prohibitions - 6 NYCRR 215.2
Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305
The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)
All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Facility Permissible Emissions
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 1.1:
The sum of emissions from the emission units specified in this permit shall not equal or exceed the following Potential To Emit (PTE) rate for each regulated contaminant:

- **CAS No: 007446-09-5**
  - **Name:** SULFUR DIOXIDE
  - **PTE:** 198,000 pounds per year

- **CAS No: 0NY210-00-0**
  - **Name:** OXIDES OF NITROGEN
  - **PTE:** 198,000 pounds per year

Condition 2: Capping Monitoring Condition
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 2.1:
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

- 6 NYCRR 201-6.1 (a)

Item 2.2:
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

Item 2.3:
The owner or operator of the permitted facility must maintain all required records on-site for a
period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Item 2.4:
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 2.5:
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 2.6:
The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.7:
Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
Facility-wide emissions of sulfur dioxide (SO2) shall not exceed 99 tons per year (198,000 lbs per year) as determined by summing monthly SO2 emissions during any consecutive 12 month period. Records shall be maintained on site which demonstrate compliance with the SO2 cap. These records shall include the mass emissions over each rolling 12 month period. Calculations are based on the following formula:

(Thousands of gallons of residual oil burned) times (78.5 pounds per thousand gallons) plus (thousands of gallons of distillate oil burned) times (0.2 pounds per thousand gallons) plus (million cubic feet of natural gas burned) times (0.6 pounds per million cubic feet) plus 1,000 pounds for exempt sources = total pounds of SO2 emitted. This total is divided by 2000 to convert to tons.

Parameter Monitored: SULFUR DIOXIDE
Upper Permit Limit: 99 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition**
Effective between the dates of 10/30/2017 and 10/29/2027

**Applicable Federal Requirement:** 6 NYCRR 201-7.1

**Item 3.1:**
Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR 201-6.1 (a)

**Item 3.2:**
Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 3.3:**
The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

**Item 3.4:**
On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 3.5:**
The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 3.6:**
The Compliance Demonstration activity will be performed for the Facility.

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

**Item 3.7:**
Compliance Demonstration shall include the following monitoring:
Capping: Yes

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

Monitoring Description:
Facility-wide emissions of nitrogen oxides (NOX) shall not exceed 99 tons per year (198,000 lbs per year) as determined by summing monthly NOx emissions during any consecutive 12 month period. Records shall be maintained on site which demonstrate compliance with the NOX cap. These records shall include the mass emissions over each rolling 12 month period. Calculations are based on the following formula:

\[(\text{Thousands of gallons of residual oil burned}) \times (75 \text{ pounds per thousand gallons}) \, + \, (\text{thousands of gallons of distillate oil burned}) \times (20 \text{ pounds per thousand gallons}) \, + \, (\text{million cubic feet of natural gas burned}) \times (100 \text{ pounds per million cubic feet}) \, + \, 12,000 \text{ pounds for exempt sources} = \text{total pounds of NOX emitted.} \]

This total is divided by 2000 to convert to tons.

Emission factors will be revised if the most recent stack test shows higher emissions.

Parameter Monitored: OXIDES OF NITROGEN
Upper Permit Limit: 99 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 4: Air pollution prohibited
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 211.1

Item 4.1:
No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 5: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

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

Item 5.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
For any air contaminant not listed on Section 212-2.2 Table 2, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b) Table 4 - Degree of Air Cleaning Required for Non-criteria Contaminants, for the environmental rating assigned to the contaminant by the department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Report Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 6: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.48c(c), NSPS Subpart Dc

Item 6.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of each coal-fired, oil-fired, or wood-fired affected facility subject to the opacity limits under 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 7: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.48c(g), NSPS Subpart Dc
Item 7.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 7.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Applicability
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40 CFR 63, Subpart JJJJJJJ

Item 8.1:
Facilities that are area sources of HAP with industrial, commercial, or institutional boilers must comply with applicable portions of 40 CFR 63 JJJJJJ.

**** Emission Unit Level ****

Condition 9: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

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

Item 9.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILR

Item 9.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
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.

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

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

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
   - date and time of day
   - observer's name
   - identity of emission point
   - weather condition
   - was a plume observed?

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

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (six minute average) of the affected emission point must be conducted within two business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Permit ID: 5-5330-00015/00029         Facility DEC ID: 5533000015

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 10:  Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.42c(d), NSPS Subpart Dc

Item 10.1:
The Compliance Demonstration activity will be performed for:

- Emission Unit: U-BOILR

Item 10.2:
Compliance Demonstration shall include the following monitoring:

- Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
- Monitoring Description:
  Using the alternative compliance method, no owner or operator shall combust oil containing greater than 0.5 percent sulfur content in an affected facility. Distillate oil compliance will be determined by supplier certification. Residual oil compliance will be determined by fuel sampling.

- Process Material: FUEL OIL
- Parameter Monitored: SULFUR CONTENT
- Upper Permit Limit: 0.5 percent
- 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 1/30/2018.
  Subsequent reports are due every 6 calendar month(s).

Condition 11:  Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.44c(g), NSPS Subpart Dc

Item 11.1:
The Compliance Demonstration activity will be performed for:

- Emission Unit: U-BOILR

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

Item 11.2:
Compliance Demonstration shall include the following monitoring:
Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:
For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits based on fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received as described in 46c(d)(2).

Process Material: FUEL OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 0.5 percent
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 30-DAY AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 12: Emission monitoring for particulate matter
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.47c(f), NSPS Subpart Dc

Item 12.1:
This Condition applies to Emission Unit: U-BOILR

Item 12.2:
An affected facility that burns only gaseous fuels or fuel oils that contain less than or equal to 0.5 weight percent sulfur and operates according to a written site-specific monitoring plan approved by the appropriate delegated permitting authority is not required to operate a COMS for measuring opacity. This monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard

Condition 13: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 40CFR 60.48c(e)(11), NSPS Subpart Dc

Item 13.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILR
Item 13.2:  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The owner or operator of an affected facility burning distillate oil may use fuel supplier certifications to demonstrate compliance with sulfur content requirements. Fuel supplier certification shall include the name of the oil supplier; a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40CFR60 41(c); and the sulfur content of the oil.

In addition to records of fuel supplier certifications, the semi annual report to the Administrator shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

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 1/30/2018.
Subsequent reports are due every 6 calendar month(s).

Condition 14: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

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

Item 14.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILR
Process: N04

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

Item 14.2:  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
The current particulate emission limit while burning residual oil is 0.20 pounds of particulate emissions per million Btu of heat input. This limit is expected to be reduced to 0.10 lb/mmBtu.
Emission testing may be required at the discretion of the permitting authority.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.20 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
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 15: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027
Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)

Item 15.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Item 15.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
No person shall cause or allow emissions to the outdoor atmosphere having an average opacity of 20% or greater for any consecutive six-minute period 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
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 16: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027
Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 16.1:
The Compliance Demonstration activity will be performed for:
Emission Unit: U-PAPER

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

Item 16.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:
   Emissions of solid particulate shall not exceed 0.050 grains of particulate per cubic foot of gas, expressed at standard conditions on a dry basis, from any emission source in this emission unit. Emission testing will be required at the Department's discretion.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.050 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 17: Compliance Demonstration Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 228-2.4 (a)

Item 17.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Item 17.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS
Monitoring Description:
   When a facility uses a commercial or industrial adhesive, the concentration of the volatile organic compounds (VOC) shall not exceed the VOC content limits specified in Table 1 of 6 NYCRR Part 228-2.4.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: ADHESIVE
Parameter Monitored: VOC CONTENT
Upper Permit Limit: 250 grams per liter
Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE
Averaging Method: MAXIMUM - NOT TO EXCEED STATED VALUE - SEE MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 18: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 234.6

Item 18.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Item 18.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:
The following work practices are prohibited:

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

(2) storage in open containers of spent or fresh VOC and/or solvents to be used for surface preparation, cleanup or ink/coating removal;

(3) use of open containers to store or dispose of inks and/or surface coatings; or

(4) use of open containers to store or dispense inks and/or surface coatings unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink or coating to a substrate

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 19: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable Federal Requirement: 6 NYCRR 234.7

Item 19.1:
The Compliance Demonstration activity will be performed for:
Emission Unit: U-PAPER

Item 19.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

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

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY
STATE ONLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records required to comply with the request within sixty working days of written notification by the Department.

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5
Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

STATE ONLY APPLICABLE REQUIREMENTS
The following conditions are state only enforceable.

Condition 20: Contaminant List
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement:ECL 19-0301

Item 20.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

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

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

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

Condition 21: Malfunctions and start-up/shutdown activities
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR 201-1.4

Item 21.1:
(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 22:  Emission Unit Definition
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 22.1:
The facility is authorized to perform regulated processes under this permit for:
Emission Unit: U-BOILR
Emission Unit Description:
One 90.7 mmBtu/hr multi fuel boiler (natural gas, #2 fuel)
oil, #4 fuel oil & #6 fuel oil) provides steam for processes and space heating. The boiler is subject to the requirements of 40 CFR 60 subpart Dc.

Building(s): 15

Item 22.2:
The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-PAPER

Emission Unit Description:

This emission unit provides a common grouping of all process equipment used for paper making and paper converting. Individual emission sources include the paper machine, dryer, winders, rewinders, folders, broke pulper and dissolved air floatation (DAF) unit.

Building(s): 45
46
47
48
TAD

Condition 23: Renewal deadlines for state facility permits
Effective between the dates of 10/30/2017 and 10/29/2027

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

Item 23.1:
The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 24: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

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

Item 24.1:
The Compliance Demonstration activity will be performed for the Facility.

Item 24.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2018.
Subsequent reports are due every 12 calendar month(s).

Condition 25: Visible Emissions Limited
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR 211.2

Item 25.1:
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.

**** Emission Unit Level ****

Condition 26: Emission Point Definition By Emission Unit
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 26.1:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-BOILR

Emission Point: EPB01
  Height (ft.): 100
  Diameter (in.): 48
  NYTMN (km.): 4791.717
  NYTME (km.): 613.986
  Building: 15

Item 26.2:
The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-PAPER

Emission Point: EF001
  Height (ft.): 34
  Diameter (in.): 44
  NYTMN (km.): 4791.719
  NYTME (km.): 614.28

Emission Point: EF002
  Height (ft.): 34
  Diameter (in.): 44
  NYTMN (km.): 4791.696
  NYTME (km.): 614.243

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Condition 27:  Process Definition By Emission Unit
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 27.1:
This permit authorizes the following regulated processes for the cited Emission Unit:

| Emission Unit: | U-BOILR |
| Process: | N02 |
| Source Classification Code: | 1-02-005-02 |
| Process Description: | Burning #2 oil in the steam boiler. |

| Emission Source/Control: | ESB01 - Combustion |
| Design Capacity: | 90.7 million Btu per hour |

Item 27.2:
This permit authorizes the following regulated processes for the cited Emission Unit:

| Emission Unit: | U-BOILR |
| Process: | N04 |
| Source Classification Code: | 1-02-005-04 |
| Process Description: | Burning residual (#4 or #6) oil in the steam boiler. |

| Emission Source/Control: | ESB01 - Combustion |
| Design Capacity: | 90.7 million Btu per hour |

Item 27.3:
This permit authorizes the following regulated processes for the cited Emission Unit:
Emission Unit: U-BOILR
Process: NG1 Source Classification Code: 1-02-006-02
Process Description: Burning natural gas in the steam boiler.

Emission Source/Control: ESB01 - Combustion
Design Capacity: 90.7 million Btu per hour

**Item 27.4:**
This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-PAPER
Process Description:
This process represents all paper converting operations.

Emission Source/Control: FF324 - Control
Control Type: FABRIC FILTER

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

Emission Source/Control: WS121 - Control
Control Type: WET SCRUBBER

Emission Source/Control: WS125 - Control
Control Type: WET SCRUBBER

Emission Source/Control: WS126 - Control
Control Type: WET SCRUBBER

Emission Source/Control: WS324 - Control
Control Type: WET SCRUBBER

Emission Source/Control: ES121 - Process

Emission Source/Control: ES122 - Process

Emission Source/Control: ES124 - Process

Emission Source/Control: ES125 - Process

Emission Source/Control: ES126 - Process

Emission Source/Control: ES324 - Process

Emission Source/Control: ESBT1 - Process

Emission Source/Control: ESBT2 - Process

Emission Source/Control: ESBT3 - Process

Emission Source/Control: ESBT5 - Process
Emission Source/Control: ESCGS - Process

Emission Source/Control: ESNF1 - Process

Emission Source/Control: ESRW6 - Process

**Item 27.5:**
This permit authorizes the following regulated processes for the cited Emission Unit:

- **Emission Unit:** U-PAPER
- **Process:** FE7
- **Source Classification Code:** 3-07-013-99
- **Process Description:**
  This process represents all TAD paper machine operations.

- **Emission Source/Control:** WS701 - Control
- **Control Type:** VENTURI SCRUBBER

- **Emission Source/Control:** WS702 - Control
- **Control Type:** WET SCRUBBER

- **Emission Source/Control:** WS703 - Control
- **Control Type:** WET SCRUBBER

- **Emission Source/Control:** WS704 - Control
- **Control Type:** WET SCRUBBER

- **Emission Source/Control:** WS705 - Control
- **Control Type:** WET SCRUBBER

- **Emission Source/Control:** ES701 - Process

- **Emission Source/Control:** ES702 - Process

- **Emission Source/Control:** ES703 - Process
  - **Design Capacity:** 25 million Btu per hour

- **Emission Source/Control:** ES704 - Process

- **Emission Source/Control:** ES705 - Process

- **Emission Source/Control:** ES706 - Process

**Item 27.6:**
This permit authorizes the following regulated processes for the cited Emission Unit:

- **Emission Unit:** U-PAPER
- **Process:** WTP
- **Source Classification Code:** 3-07-013-99
- **Process Description:**
  This process represents operation of the dissolved air floatation (DAF) system in the wastewater treatment plant.
Condition 28: Compliance Demonstration
Effective between the dates of 10/30/2017 and 10/29/2027

Applicable State Requirement: 6 NYCRR 225-1.2 (h)

Item 28.1:
The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILR

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

Item 28.2:
Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
Owners and/or operators of any stationary combustion installation that fires distillate oil are limited to the firing of distillate oil with a sulfur content of 15 parts per million sulfur.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. Facility owners or operators must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
Parameter Monitored: SULFUR CONTENT
Upper Permit Limit: 15 parts per million by weight
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY