



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air Title V Facility
Permit ID: 5-5334-00006/00035
Effective Date: 03/28/2017 Expiration Date: 03/27/2022

Permit Issued To: HOLLINGSWORTH & VOSE CO
112 WASHINGTON ST
EAST WALPOLE, MA 02032-1098

Contact: VIRGINIA L HAWRYSZ
HOLLINGSWORTH & VOSE CO
3235 CO RTE 113
GREENWICH, NY 12834
(518) 695-8175

Facility: HOLLINGSWORTH & VOSE GREENWICH MILL
2322 ST RTE 29
CENTER FALLS, NY 12834

Description:

Hollingsworth & Vose Company's Greenwich Facility is a manufacturer of technical and specialty papers and is located in the Town of Greenwich, Washington County. At this facility, various paper webs are formed, coated/saturated and dried/cured using one paper machine. The process begins by spreading a slurry containing wood pulp and/or other fiber onto a former and removing the moisture to form a web. All wood pulp used in the process is purchased from outside suppliers.

The process varies depending upon the product being made. In most cases, coatings (i.e., binders) are applied and the paper web is dried again. This machine also has the ability to cure certain coatings by using propane fired heating units. The finished product is rolled into large rolls which may be converted into smaller sizes prior to packaging and shipment.

Processes performed on the paper machine are grouped together as Emission Unit U-PAPER, and are regulated under 6 NYCRR Parts 212 (Process Operations) and 228 (Surface Coating Processes). Since this facility was major for Hazardous Air Pollutants (HAPs) on the rule's compliance date, certain paper web coating lines must also comply with HAP standards as specified in 40 CFR 63, Subpart JJJJ, including record keeping and monitoring requirements. Compliance with Subpart JJJJ also satisfies the requirements of Part 212 for the regulated HAPs, with the exception of High Toxics Air Contaminants (HTACs).



New York State Department of Environmental Conservation

Facility DEC ID: 5533400006

HTACs require a Toxic Impact Assessment (TIA) demonstrating that the maximum offsite ambient impact concentrations are less than the Department's allowable annual and short-term guideline concentrations (AGC/SGC). Emissions of formaldehyde (HTAC) have been limited in order to comply with requirements contained in Section 212-2.1(b). Monitoring and record keeping of formulations produced, and the resulting emissions of formaldehyde, are required in order to demonstrate compliance with the limits. In addition, formaldehyde emissions are periodically measured by stack testing. Coating processes must also use compliant coatings as specified in Section 228.7. This limits the quantity of volatile organic compounds (VOC) emitted during coating.

Steam heated can dryers are used to dry the paper web, with steam provided by a natural gas fired 25 mmBtu/hr Hurst boiler and a 16 mmBTU/hr Ames boiler. The Hurst boiler also has the capability of firing No. 2 fuel during periods of gas curtailment. Drying on this machine is aided by a Thru-dryer fired with propane. The boilers are designated as Emission Unit U-BOILR, and regulated under 6 NYCRR Part 227 and 40 CFR 60, Subpart Dc (Hurst boiler only). 40 CFR 60, Subpart Dc, limits fuel oil sulfur content combusted in the Hurst boiler which is allowed during fuel curtailment to no greater than .5 percent. However, this limit is superseded by 6 NYCRR 225 standards which limits distillate fuel oil sulfur content to .0015 %, or less. Compliance with these limits are demonstrated through fuel oil certifications. As area source for HAPs (on the compliance date of the major source boiler NESHAP), the boilers are not subject to 40 CFR 63, Subpart JJJJJ while operated as a gas only boiler. In addition, 6 NYCRR Part 227 establishes particulate and opacity standards for combustion sources.

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 ******

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 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

New York State Department of Environmental Conservation

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: HOLLINGSWORTH & VOSE CO
112 WASHINGTON ST
EAST WALPOLE, MA 02032-1098

Facility: HOLLINGSWORTH & VOSE GREENWICH MILL
2322 ST RTE 29
CENTER FALLS, NY 12834

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

Permit Effective Date: 03/28/2017

Permit Expiration Date: 03/27/2022



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.6: Acceptable Ambient Air Quality
- 2 6 NYCRR 201-6.4 (a) (7): Fees
- 3 6 NYCRR 201-6.4 (c): Recordkeeping and Reporting of Compliance Monitoring
- 4 6 NYCRR 201-6.4 (c) (2): Records of Monitoring, Sampling, and Measurement
- 5 6 NYCRR 201-6.4 (c) (3) (ii): Compliance Certification
- 6 6 NYCRR 201-6.4 (e): Compliance Certification
- 7 6 NYCRR 202-2.1: Compliance Certification
- 8 6 NYCRR 202-2.5: Recordkeeping requirements
- 9 6 NYCRR 215.2: Open Fires - Prohibitions
- 10 6 NYCRR 200.7: Maintenance of Equipment
- 11 6 NYCRR 201-1.7: Recycling and Salvage
- 12 6 NYCRR 201-1.7: Recycling and Salvage
- 13 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 14 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 15 6 NYCRR 201-3.2 (a): Exempt Sources - Proof of Eligibility
- 16 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 17 6 NYCRR 201-3.3 (a): Trivial Sources - Proof of Eligibility
- 18 6 NYCRR 201-6.4 (a) (4): Requirement to Provide Information
- 19 6 NYCRR 201-6.4 (a) (8): Right to Inspect
- 20 6 NYCRR 201-6.4 (f) (6): Off Permit Changes
- 21 6 NYCRR 202-1.1: Required Emissions Tests
- 22 40 CFR Part 68: Accidental release provisions.
- 23 40CFR 82, Subpart F: Recycling and Emissions Reduction
- 24 6 NYCRR Subpart 201-6: Emission Unit Definition
- 25 6 NYCRR 201-6.4 (d) (4): Progress Reports Due Semiannually
- 26 6 NYCRR 211.1: Air pollution prohibited
- 27 6 NYCRR 212-1.5 (e) (2): Compliance Certification
- 28 6 NYCRR 212-1.5 (e) (2): Compliance Certification
- 29 6 NYCRR 212-1.5 (e) (2): Compliance Certification
- 30 6 NYCRR 212-1.6 (a): Compliance Certification
- 31 6 NYCRR 225-1.2 (h): Compliance Certification
- 32 6 NYCRR 227.2 (b) (1): Compliance Certification
- 33 40CFR 60, NSPS Subpart A: Applicability of Subpart A General Provisions
- 34 40CFR 60.48c(f)(1), NSPS Subpart Dc: Compliance Certification
- 35 40CFR 60.48c(g)(2), NSPS Subpart Dc: Alternative recordkeeping
- 36 40CFR 63.11225(g), Subpart JJJJJ: Fuel switching notification
- 37 40CFR 63, Subpart ZZZZ: Compliance and Enforcement
- 38 40CFR 63.6585, Subpart ZZZZ: Compliance Certification

Emission Unit Level

- 39 6 NYCRR Subpart 201-6: Emission Point Definition By Emission Unit
- 40 6 NYCRR Subpart 201-6: Process Definition By Emission Unit

EU=U-BOILR



41 6 NYCRR 227-1.3 (a): Compliance Certification

EU=U-BOILER,Proc=012

42 40CFR 60.48c(e)(11), NSPS Subpart Dc: Compliance Certification

EU=U-PAPER,Proc=0CC

- 43 6 NYCRR 228-1.3 (a): Compliance Certification
- 44 6 NYCRR 228-1.3 (b) (1): Compliance Certification
- 45 6 NYCRR 228-1.3 (d): Surface Coating - Handling, storage and disposal
- 46 6 NYCRR 228-1.4 (d) (3): Compliance Certification
- 47 6 NYCRR 228-1.6 (a): Compliance Certification
- 48 6 NYCRR 228-1.6 (c): Surface coating access for sampling
- 49 6 NYCRR 228-1.6 (h): Compliance Certification
- 50 40CFR 63.3320(b)(3), Subpart JJJJ: Compliance Certification
- 51 40CFR 63.3340, Subpart JJJJ: General requirements -
startup/shutdown/malfunction plans (verbatim)
- 52 40CFR 63.3360(c), Subpart JJJJ: Compliance Certification
- 53 40CFR 63.3400(c)(2), Subpart JJJJ: Compliance Certification
- 54 40CFR 63.3410(a), Subpart JJJJ: Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 55 ECL 19-0301: Contaminant List
- 56 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 57 6 NYCRR 211.2: Visible Emissions Limited
- 58 6 NYCRR 212-2.3 (b): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

****** 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



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



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 therequirement 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 1: Acceptable Ambient Air Quality
Effective between the dates of 03/28/2017 and 03/27/2022**

Applicable Federal Requirement:6 NYCRR 200.6

Item 1.1:

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



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

Condition 2: Fees
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 2.1:

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 3: Recordkeeping and Reporting of Compliance Monitoring
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 3.1:

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 4: Records of Monitoring, Sampling, and Measurement
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 4.1:

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



reports required by the permit.

Condition 5: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 5.1:

The Compliance Certification activity will be performed for the Facility.

Item 5.2:

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,



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



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 6: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

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:

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



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 7: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 202-2.1

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:

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

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

Condition 8: Recordkeeping requirements
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 202-2.5

Item 8.1:

(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 9: Open Fires - Prohibitions
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 215.2

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Item 9.1:

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 9.2

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.

**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 10: Maintenance of Equipment
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 200.7

Item 10.1:

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 11: Recycling and Salvage
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 201-1.7

Item 11.1:

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 12: Recycling and Salvage
Effective between the dates of 03/28/2017 and 03/27/2022

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 03/28/2017 and 03/27/2022

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 03/28/2017 and 03/27/2022

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 them available to representatives of the department upon request.

Condition 15: Exempt Sources - Proof of Eligibility
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 15.1:

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 them available to representatives of the department upon request.

Condition 16: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 16.1:

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 17: Trivial Sources - Proof of Eligibility
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 17.1:

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 18: Requirement to Provide Information
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 18.1:

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

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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 19: Right to Inspect

Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 19.1:

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.

Condition 20: Off Permit Changes

Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 20.1:

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



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

Condition 24: Emission Unit Definition
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 24.1:

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

Emission Unit: U-BOILER

Emission Unit Description:

Facility boilers - Emission Unit consists of two (2) steam generating boilers. The Hurst and Ames boilers have maximum rated heat input capacities of 25 mmBtu/hr and 16 mmBtu/hr, respectively. The Ames boiler has the capability to be fired with natural gas only (PR No. 013). The Hurst boiler has the capacity to be fired with natural gas or No. 2 fuel oil as backup (PR No. 012). Only the Hurst boiler (ES No. HUBLR) is subject to 40 CFR 60, Subpart Dc, since the Ames boiler (ES No. 00004) predates this regulation. The Hurst and Ames boiler each have its own stack (EP Nos. 00008 and 00009, respectively).

Building(s): MILL

Item 24.2:

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

Emission Unit: U-PAPER

Emission Unit Description:

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

Building(s): MILL

Condition 25: Progress Reports Due Semiannually
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 25.1:

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 26: Air pollution prohibited
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 211.1

Item 26.1:

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 27: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 212-1.5 (e) (2)

Item 27.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER
Process: OCC

Item 27.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation and, for those NESHAPs regulating HTACs found in Section 212-2.2, Table 2 – High Toxicity Air Contaminant List, of this Part, provide a Toxic Impact Assessment (TIA)

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demonstrating that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

As demonstrated in a TIA (prepared by CHA, December 2015) offsite ambient air concentrations are less than the SGC/AGC when hourly and annual emissions are no greater than .8 lbs and .67 tons, respectively.

The owner or operator shall limit annual emissions of formaldehyde from the paper machine to .67 tons, or less, during any twelve (12) consecutive months, rolled monthly.

The formulations run shall be monitored and recorded along with time, date and duration of the run, in order to document that this annual emission is not exceeded. This record shall include, for each month, acceptable calculations of the tons of formaldehyde emitted, as well as the total for the past consecutive twelve (12) months. Each consecutive twelve (12) month total must meet the applicable limit.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: .67 tons

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: 12-MONTH TOTAL, 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 28: Compliance Certification

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 212-1.5 (e) (2)

Item 28.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-PAPER

Process: OCC

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 28.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation and, for those NESHAPs regulating HTACs found in Section 212-2.2, Table 2 – High Toxicity Air Contaminant List, of this Part, provide a Toxic Impact Assessment (TIA) demonstrating that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

As demonstrated in a TIA (prepared by CHA, December 2015), offsite ambient air concentrations are less than the SGC/AGC when hourly and annual emissions are no greater than .8 lbs and .67 tons, respectively.

The owner or operator shall limit hourly emissions of formaldehyde from the paper machined to .8 lbs., or less.

For the purpose of ascertaining compliance or noncompliance with this limit, the source owner shall perform a stack test, as approved by the Department, on an annual basis. Frequency of stack tests events may revert back to once-per-term of the facility's title V permit, after the facility demonstrates continuous compliance for three (3) consecutive years.

Upper Permit Limit: 0.8 pounds per hour

Reference Test Method: NCASI Method 98.01 or as approved by DEC

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

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 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 212-1.5 (e) (2)

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Item 29.1:

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

Emission Unit: U-PAPER
Process: OCC

Item 29.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation and, for those NESHAPs regulating HTACs found in Section 212-2.2, Table 2 – High Toxicity Air Contaminant List, of this Part, provide a Toxic Impact Assessment (TIA) demonstrating that the maximum offsite ambient air concentration is less than the AGC/SGC and that emissions are less than the PB trigger for the respective air contaminant.

As demonstrated in a TIA (prepared by CHA, December 2015), offsite ambient air concentrations are less than the SGC/AGC when hourly and annual emissions are no greater than .8 lbs and .67 tons, respectively.

The owner or operator shall limit hourly emissions of formaldehyde from the paper machine to .8 lbs., or less.

The formulations run shall be monitored and recorded along with time, date and duration of the run, in order to document that hourly emissions are not exceeded. This record shall include acceptable calculations of the formaldehyde emission rates.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 0.8 pounds per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT
ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2017.

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

Condition 30: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 30.1:

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

Emission Unit: U-PAPER
Process: 00C

Item 30.2:

Compliance Certification 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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?

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

If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective

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action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: 6 MINUTE 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 31: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 31.1:
The Compliance Certification activity will be performed for the Facility.

Item 31.2:
Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:
Owners and/or operators of a stationary combustion

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installations that fire distillate oil are limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. Compliance with this limit will be based on vendor certifications. Compliance with this condition also assures compliance with the sulfur content limit in 40 CFR 60.42c(d) of no greater than 0.5 percent by weight.

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. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: .0015 percent by weight

Monitoring Frequency: PER DELIVERY

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

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 32: Compliance Certification

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 227.2 (b) (1)

Item 32.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: U-BOILR

Process: 012

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 32.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The two hour average emission of particulates from this stationary combustion installation shall not exceed 0.10

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pounds per million Btu of heat input.

At the monitoring frequency stated below the facility shall perform the following:

- 1) Submit to the Department an acceptable protocol for the testing of particulate emissions in a manner that will determine compliance with the limit cited in this condition.
- 2) Perform a stack test, based upon the approved test protocol, to determine compliance with the particulate emission limit cited in this condition.
- 3) Submit an acceptable stack test report that outlines the results obtained from the testing done to meet the requirement of #2 above.
- 4) Facility shall keep records of all testing done at this stationary combustion installation for a period of 5 years.

Stack testing frequency shall be upon request provided the source owner or operator burns No. 2. fuel oil only during periods of gas curtailment, gas supply emergencies, or periodic testing on No. 2 fuel oil. Periodic testing of No. 2 fuel shall not exceed a combined total of 48 hours during any calendar year. If the source owner or operator deviates from these work practices, stack testing shall be conducted within 180 days and every five (5) years thereafter. If work practices are restored immediately following stack test, then stack testing frequency may revert back to upon request.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 5

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 33: Applicability of Subpart A General Provisions
Effective between the dates of 03/28/2017 and 03/27/2022**

Applicable Federal Requirement:40CFR 60, NSPS Subpart A

Item 33.1:



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This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 34: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 60.48c(f)(1), NSPS Subpart Dc

Item 34.1:

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

Emission Unit: U-BOILR
Process: 012

Emission Source: HUBLR

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuel supplier certification shall include the following information for distillate oil:

- i) The name of the oil supplier, and
- ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c. 60-Dc 41c defines distillate oil as fuel that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, A standard Specification for Fuel Oils.
- iii) The sulfur content or maximum sulfur content of the oil.

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 35: Alternative recordkeeping
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 60.48c(g)(2), NSPS Subpart Dc

Item 35.1:

This Condition applies to:

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Emission Unit: UBOILR

Process: 012

Emission Source: HUBLR

Emission Unit: UBOILR

Process: 013

Emission Source: HUBLR

Item 35.2:

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Condition 36: Fuel switching notification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 40CFR 63.11225(g), Subpart JJJJJ

Item 36.1:

If the owner or operator has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or he/she has taken a permit limit that resulted in the boiler being subject to subpart JJJJJ, he/she must provide notice of the date upon which he/she switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:

(1) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

(2) The date upon which the fuel switch, physical change, or permit limit occurred.

Condition 37: Compliance and Enforcement
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 40CFR 63, Subpart ZZZZ

Item 37.1:

The Department has not accepted delegation of 40 CFR Part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Any questions concerning compliance and/or enforcement of this regulation should be referred to USEPA Region 2, 290 Broadway, 21st Floor, New York, NY 10007-1866; (212) 637-4080. Should the Department decide to accept delegation of 40 CFR Part 63 Subpart ZZZZ during the term of this permit, enforcement of this regulation will revert to the Department as of the effective date of delegation.

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Condition 38: Compliance Certification

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.6585, Subpart ZZZZ

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:

You are subject to this subpart (40 CFR 63, Subpart ZZZZ) if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 39: Emission Point Definition By Emission Unit

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 39.1:

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

Emission Unit: U-BOILR

Emission Point: 00008

Height (ft.): 34

Diameter (in.): 28

NYTMN (km.): 4772.723

NYTME (km.): 625.342

Building: MILL

Emission Point: 00009

Height (ft.): 34

Diameter (in.): 82

NYTMN (km.): 4772.736

NYTME (km.): 625.341

Building: MILL

Item 39.2:

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

Emission Unit: U-PAPER

Emission Point: 011A1



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Height (ft.): 38	Diameter (in.): 36	
NYTMN (km.): 4772.747	NYTME (km.): 625.309	Building: MILL
Emission Point: 011A2		
Height (ft.): 40	Diameter (in.): 32	
NYTMN (km.): 4772.75	NYTME (km.): 625.298	Building: MILL
Emission Point: 011A3		
Height (ft.): 38	Length (in.): 18	Width (in.): 18
NYTMN (km.): 4772.768	NYTME (km.): 625.302	Building: MILL
Emission Point: 011A4		
Height (ft.): 38	Diameter (in.): 32	
NYTMN (km.): 4772.757	NYTME (km.): 625.306	Building: MILL
Emission Point: 011A5		
Height (ft.): 38	Diameter (in.): 32	
NYTMN (km.): 4772.762	NYTME (km.): 625.304	Building: MILL
Emission Point: 011CS		
Height (ft.): 93	Diameter (in.): 43	
NYTMN (km.): 4772.793	NYTME (km.): 625.298	Building: MILL

Condition 40: Process Definition By Emission Unit
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR Subpart 201-6

Item 40.1:

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

Emission Unit: U-BOILR
 Process: 012 Source Classification Code: 1-02-005-02
 Process Description:

This process permits the combustion of No. 2 fuel oil in accordance with 40 CFR 63, Subpart JJJJJJ, for gas 1 subcategory boilers during periods of natural gas curtailment.

Period of gas curtailment or supply interruption means a period of time during which the supply of natural gas to an affected boiler or process heater is restricted or halted for reasons beyond the control of the facility. The act of entering into a contractual agreement with a supplier of natural gas established for curtailment purposes does not constitute a reason that is under the control of a facility for the purposes of this definition. An increase in the cost or unit price of natural gas due to normal market fluctuations not during periods of supplier delivery restriction does not constitute a period of natural gas curtailment or supply interruption. On-site gaseous fuel system emergencies or equipment failures

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qualify as periods of supply interruption when the emergency or failure is beyond the control of the facility.

Emission Source/Control: HUBLR - Combustion
Design Capacity: 25 million Btu per hour

Item 40.2:

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

Emission Unit: U-BOILER
Process: 013 Source Classification Code: 1-02-006-02
Process Description:

This process includes two (2) natural gas boilers designated as gas only accordance with 40 CFR 63, Subpart JJJJJ.

Natural gas boilers that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Natural gas boilers that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition.

Emission Source/Control: AMESA - Combustion
Design Capacity: 16 million Btu per hour

Emission Source/Control: HUBLR - Combustion
Design Capacity: 25 million Btu per hour

Item 40.3:

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

Emission Unit: U-PAPER
Process: 00C Source Classification Code: 3-07-999-99
Process Description:

On No. 11 paper machine, a wet web of paper is formed and then passes over steam heated can dryers and propane fired thru dryer. The thru dryer is also not considered a 40 CFR 63, Subpart JJJJJ, process heater as the combustion gases may come into contact with process materials. The thru dryer does not meet the Part 200 definition for a combustion installation and is therefore not exempt from permitting or Part 212.

Emission Source/Control: WET11 - Process

Item 40.4:

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

Emission Unit: U-PAPER



Process: OCC Source Classification Code: 4-02-013-01
Process Description:

Binders are applied to the web of paper in a saturator. The saturated web passes over steam heated can dryers and propane fired infrared unit(s). The infrared unit is also not considered a 40 CFR 63, Subpart JJJJJ, process heater as the combustion gases may come into contact with process materials. The Infrared unit does not meet the Part 200 definition for a combustion installation and is therefore not exempt from permitting or Part 212. Exhausts are vented to a common stack (011CS).

Emission Source/Control: DRY11 - Process

Condition 41: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 41.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILR

Item 41.2:

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.

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

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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: EPA 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 42: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 42.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-BOILR
Process: 012

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

Item 42.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records as required under §60.48c(d) including the following information.

If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph §60.48c(f)(1)(2) or (3). In



addition to records of fuel supplier certification, the semi-annual report 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 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 4/30/2017.

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

Condition 43: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 43.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: OCC

Item 43.2:

Compliance Certification 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 having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

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

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- was a plume observed?

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

If the operator observes any visible emissions (other than steam - see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions above those that are normal and in compliance continue to be present after corrections are made, the permittee will immediately notify the department and conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

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

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Method 9
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
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 44: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

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Item 44.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: OCC

Item 44.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has an overall removal efficiency of at least 90 percent.
4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.
5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 45: Surface Coating - Handling, storage and disposal
Effective between the dates of 03/28/2017 and 03/27/2022**

Applicable Federal Requirement: 6 NYCRR 228-1.3 (d)

Item 45.1:

This Condition applies to Emission Unit: U-PAPER



Process: OCC

Item 45.2:

Within the work area(s) associated with a coating line, the owner or operator of a facility must:

- (1) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (2) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (3) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (4) not use open containers to store or dispense surface coatings and/or inks unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;
- (5) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;
- (6) minimize spills during the handling and transfer of coatings and VOC solvents; and
- (7) clean hand held spray guns by one of the following:
 - (i) an enclosed spray gun cleaning system that is kept closed when not in use;
 - (ii) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;
 - (iii) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or
 - (iv) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Condition 46: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 228-1.4 (d) (3)

Item 46.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER
Process: OCC

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Item 46.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility applying coatings to paper film and foil may not use coatings with VOC contents, as applied, which exceed the limits specified in table D-2. The units in table D-2 are in terms of weight of VOC per weight of coating applied.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: VOC CONTENT

Upper Permit Limit: .08 kilograms VOC per kilogram as applied

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

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

Reporting Requirements: 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 47: Compliance Certification

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement: 6 NYCRR 228-1.6 (a)

Item 47.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: OCC

Item 47.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

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An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 48: Surface coating access for sampling
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 228-1.6 (c)

Item 48.1:

This Condition applies to Emission Unit: U-PAPER
Process: OCC

Item 48.2:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 49: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:6 NYCRR 228-1.6 (h)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER
Process: OCC

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Any information or record showing noncompliance with the requirements of 228-1 'Surface Coating Processes' must be reported to the department within 30 days following notice or generation of the information or record. All records required by this condition must be maintained at the facility for a period of five years.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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Condition 50: Compliance Certification

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.3320(b)(3), Subpart JJJJ

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER

Process: OCC

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Source owner or operator must limit organic HAP content of each coating material as-applied at an existing affected source to no more than 0.20 kg organic HAP per kg coating solids.

Following the procedure set out in §63.3370(c)(2), source owner or operator shall demonstrate compliance by Equations 2 and 3 of §63.3370 in accordance with §63.3370(c)(5)(i).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 0.02 kilograms organic HAP per kilogram solids applied

Reference Test Method: Method 24, 311 or Formulation Data

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO EXCEED 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 51: General requirements - startup/shutdown/malfunction plans (verbatim)

Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.3340, Subpart JJJJ



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Item 51.1:

This Condition applies to Emission Unit: U-PAPER
Process: OCC

Item 51.2:

Table 2 to this subpart specifies the provisions of subpart A of this part that apply if you are subject to this subpart, such as startup, shutdown, and malfunction plans (SSMP) in §63.6(e)(3) for affected sources using a control device to comply with the emission standards.

Condition 52: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.3360(c), Subpart JJJJ

Item 52.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER
Process: OCC

Item 52.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

If you determine compliance with the emission standard in §63.3320(b)(3), you must determine organic HAP and solid content of each coating material “as-purchased” by following the procedures specified in paragraphs (c)(1) through (3) and (d)(1) through (2) of this section.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL
CHANGE

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 53: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.3400(c)(2), Subpart JJJJ

Item 53.1:

The Compliance Certification activity will be performed for:

Emission Unit: U-PAPER
Process: OCC

Item 53.2:

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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The source owner or operator must submit a semiannual compliance report which contains the information:

- (i) Company name and address.
- (ii) Statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report.
- (iii) Date of report and beginning and ending dates of the reporting period.
- (iv) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.
- (v) For each deviation from an emission limitation (emission limit or operating limit) that applies to you and that occurs at an affected source where you are not using a CEMS to comply with the emission limitations in this subpart, the compliance report must contain the information in paragraphs (c)(2)(i) through (iii) of this section, and:
 - (A) The total operating time of each affected source during the reporting period.
 - (B) Information on the number, duration, and cause of deviations (including unknown cause), if applicable, and the corrective action taken.

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 54: Compliance Certification
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable Federal Requirement:40CFR 63.3410(a), Subpart JJJJ

Item 54.1:

The Compliance Certification activity will be performed for:

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Emission Unit: U-PAPER
Process: OCC

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

Item 54.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source determining compliance with the emission standard in §63.3320(b)(3) must maintain the records specified in paragraphs (a)(1) of this section on a monthly basis in accordance with the requirements of §63.10(b)(1):

(1) Records specified in §63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including:

Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(c);

Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of §63.3360(d);

Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of §63.3370(b), (c), and (d).

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).



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



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 55: Contaminant List
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable State Requirement:ECL 19-0301

Item 55.1:
Emissions of the following contaminants are subject to contaminant specific requirements in this permit(emission limits, control requirements or compliance monitoring conditions).

CAS No: 000050-00-0
Name: FORMALDEHYDE

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

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

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

Condition 56: Malfunctions and start-up/shutdown activities
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable State Requirement:6 NYCRR 201-1.4

Item 56.1:
(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 57: Visible Emissions Limited
Effective between the dates of 03/28/2017 and 03/27/2022

Applicable State Requirement:6 NYCRR 211.2

Item 57.1:

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 58: Compliance Demonstration
Effective between the dates of 03/28/2017 and 03/27/2022

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

Item 58.1:

New York State Department of Environmental Conservation

Permit ID: 5-5334-00006/00035

Facility DEC ID: 5533400006



The Compliance Demonstration activity will be performed for the Facility.

Item 58.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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 Air Contaminants for the environmental rating assigned to the contaminant by the department.

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).

