

Facility DEC ID: 8180200069

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 8-1802-00069/02001
Effective Date: 08/27/2021 Expiration Date: 08/26/2031

Permit Issued To: GEORGIA-PACIFIC CORRUGATED LLC
4E TREADEASY AVE
BATAVIA, NY 14020

Contact: CHARLIE GOULD
4E TREADEASY AVE
BATAVIA, NY 14020
(585) 815-6375

Facility: GEORGIA-PACIFIC CORRUGATED LLC
4E TREADEASY AVE
BATAVIA, NY 14020

Contact: NATHAN DURKEE
4E TREADEASY AVE
BATAVIA, NY 14020
(585) 815-6359

Description:

Initial Air State Facility Permit for the Georgia-Pacific Corrugated, LLC Batavia facility located at 4E Treadeasy Ave., Batavia, NY, which manufactures corrugated paperboard. The facility includes Emission Units S-00001 and C-00001 for the corrugating and manufacturing of the product and natural gas-fired boilers under Emission Units B-00001 and B-00002 that provide steam heat to the manufacturing process. The facility currently operates under an Air Facility Registration and is obtaining an Air State Facility permit due to the proposed corrugator hourly production speed increase and emissions of a high-toxicity air contaminant (HTAC) in excess of the thresholds under 6 NYCRR 201-9.

Facility process emissions are subject to the requirements of 6 NYCRR Part 212 - Process Operations. As part of this permit application the facility submitted a T-BACT analysis per 6 NYCRR 212-1.5(d) for formaldehyde emissions from the corrugator (Emission Unit C-00001). The facility has demonstrated that the maximum degree of formaldehyde emissions control is being applied for Emission Unit C-00001. Consistent with the T-BACT analysis a monitoring condition is included limiting annual corrugator production to 2,100,000 thousand square feet per year.

The natural gas-fired boilers are subject to recordkeeping requirements under 40 CFR 60, Subpart Dc.

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

Permit Administrator: THOMAS P HALEY
 6274 E AVON LIMA RD
 AVON, NY 14414-9519

Authorized Signature: _____ Date: ____ / ____ / ____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

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

Item B: Permittee's Contractors to Comply with Permit

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

Item C: Permittee Responsible for Obtaining Other Required Permits

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

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

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

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

Condition 1: Facility Inspection by the Department
Applicable State Requirement: ECL 19-0305

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

Condition 2: Relationship of this Permit to Other Department Orders and Determinations
Applicable State Requirement: ECL 3-0301 (2) (m)

Item 2.1:

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

Condition 3: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

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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 8 HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 8 Headquarters
Division of Environmental Permits
6274 Avon-Lima Road
Avon, NY 14414-9519
(585) 226-2466

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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4E TREADEASY AVE
BATAVIA, NY 14020

Facility: GEORGIA-PACIFIC CORRUGATED LLC
4E TREADEASY AVE
BATAVIA, NY 14020

Authorized Activity By Standard Industrial Classification Code:
2653 - CORRUGATED AND SOLID FIBER BOX

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FEDERALLY ENFORCEABLE CONDITIONS

FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request.

Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

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

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)

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All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Visible Emissions Limited
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable Federal Requirement:6 NYCRR 211.2

Item 1.1:

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

Condition 2: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable Federal Requirement:6 NYCRR 227-1.4 (a)

Item 2.1:

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

Emission Unit: B-00001	Emission Point: 00B01
Emission Unit: B-00002	Emission Point: 00B02

Item 2.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

To demonstrate compliance with the opacity standard under 6 NYCRR Subpart 227-1.4(a), the facility owner or operator shall be required to perform the following monitoring for stationary combustion sources:

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

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

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

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

3) If the operator observes any visible emissions (other than steam - see below) for two consecutive days, then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

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: UPON REQUEST BY REGULATORY AGENCY

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Condition 3: Applicability of Subpart A General Provisions
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable Federal Requirement:40CFR 60, NSPS Subpart A

Item 3.1:

This Condition applies to:

Emission Unit: B00001

Emission Unit: B00002

Item 3.2:

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 4: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

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

Item 4.1:

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

Emission Unit: B-00001

Emission Unit: B-00002

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 5: Alternative Recordkeeping
Effective between the dates of 08/27/2021 and 08/26/2031

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

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Item 5.1:

This Condition applies to Emission Unit: B-00001

Item 5.2:

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 6: Alternative Recordkeeping
Effective between the dates of 08/27/2021 and 08/26/2031

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

Item 6.1:

This Condition applies to Emission Unit: B-00002

Item 6.2:

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.

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STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

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

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

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with 6 NYCRR Part 616 - Public Access to Records.
Facility owners and/or operators must submit the records
required to comply with the request within sixty working
days of written notification by the Department.

Item C: **General Provisions for State Enforceable Permit Terms and
Condition - 6 NYCRR Part 201-5**

Any person who owns and/or operates stationary sources
shall operate and maintain all emission units and any
required emission control devices in compliance with all
applicable Parts of this Chapter and existing laws, and
shall operate the facility in accordance with all
criteria, emission limits, terms, conditions, and
standards in this permit. Failure of such person to
properly operate and maintain the effectiveness of such
emission units and emission control devices may be
sufficient reason for the Department to revoke or deny a
permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 7: Contaminant List
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement: ECL 19-0301

Item 7.1:

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: 000075-07-0
Name: ACETALDEHYDE

CAS No: 000107-02-8
Name: ACROLEIN

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CAS No: 0NY075-00-0
Name: PARTICULATES**Condition 8: Malfunctions and Start-up/Shutdown Activities**
Effective between the dates of 08/27/2021 and 08/26/2031**Applicable State Requirement:6 NYCRR 201-1.4****Item 8.1:**

(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 maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, 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 monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall 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. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. 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, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility 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 9: Emission Unit Definition
Effective between the dates of 08/27/2021 and 08/26/2031**Applicable State Requirement:6 NYCRR Subpart 201-5**

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Item 9.1:

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

Emission Unit: B-00001

Emission Unit Description:

Operation of a natural gas-fired boiler to provide steam heat to the corrugation process.

Building(s): BLDG1

Item 9.2:

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

Emission Unit: B-00002

Emission Unit Description:

Operation of a natural gas-fired boiler to provide steam heat to the corrugation process.

Building(s): BLDG1

Item 9.3:

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

Emission Unit: C-00001

Emission Unit Description:

Production of corrugated paperboard using one 98" corrugator with integrated scrap paper collection system (shredder, cyclone, and baler).

Building(s): BLDG1

Item 9.4:

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

Emission Unit: S-00001

Emission Unit Description:

Starch silo and mixing operation that prepares a starch-based adhesive for the corrugation process.

Building(s): BLDG1

Condition 10: Renewal deadlines for state facility permits
Effective between the dates of 08/27/2021 and 08/26/2031

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

Item 10.1:

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

Condition 11: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

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

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Facility DEC ID: 8180200069

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 8
6274 East Avon-Lima Rd.
Avon, NY 14414

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Air pollution prohibited
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR 211.1

Item 12.1:

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 13: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

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

Item 13.1:

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

- | | |
|------------------------|-----------------------|
| Emission Unit: C-00001 | Emission Point: 00RF1 |
| Emission Unit: C-00001 | Emission Point: 00RF2 |
| Emission Unit: C-00001 | Emission Point: 00RF3 |
| Emission Unit: C-00001 | Emission Point: 00RF4 |

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Emission Unit: C-00001

Emission Point: 00RF5

Emission Unit: S-00001

Emission Point: 00S01

Item 13.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions 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 an EPA Reference Test Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator 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 specified below.

The facility owner or operator 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 limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Daily records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

All records kept pursuant to this condition must be provided to the Department upon request.

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Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: EPA Reference Test Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 14: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR 212-2.2

Item 14.1:

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

Emission Unit: C-00001
 Process: C01 Emission Source: 00C01

Regulated Contaminant(s):
 CAS No: 000075-07-0 ACETALDEHYDE

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000075-07-0) Acetaldehyde = 1000 pounds per year

Monitoring Frequency: ANNUALLY
 Averaging Method: ANNUAL TOTAL
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 15: Compliance Demonstration
Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR 212-2.2

Item 15.1:

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

Emission Unit: C-00001

Permit ID: 8-1802-00069/02001

Facility DEC ID: 8180200069

Process: C01

Emission Source: 00C01

Regulated Contaminant(s):

CAS No: 000107-02-8 ACROLEIN

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000107-02-8) Acrolein = 25 pounds per year

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 16: Compliance Demonstration

Effective between the dates of 08/27/2021 and 08/26/2031

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

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: C-00001

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

In accordance with 6 NYCRR 212-2.1(b), process emissions of formaldehyde (HCHO) from the corrugator (EU C-00001) must comply with the air cleaning requirements under Table 4 to 6 NYCRR 212-2.3(b). The corrugator emits 0.051 lbs/hour of HCHO and this contaminant has been assigned an Environmental Rating of "A". According to the degree of air cleaning specified for A-rated air contaminants with an ERP less than 0.1 lbs/hour under Table 4, ambient impacts from process emissions of HCHO must meet the

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annual guideline concentration (AGC) under NYSDEC Program Policy DAR-1.

The facility owner or operator has submitted an air dispersion modeling analysis demonstrating that the maximum offsite HCHO concentration exceeds the DAR-1 annual guideline concentration (AGC). Accordingly, The Department has reviewed the T-BACT analysis submitted by the facility owner or operator per the procedure under 6 NYCRR 212-1.5(d) and determined the maximum degree of emissions control is being applied to this process.

The T-BACT analysis and the Department's determination were based on a maximum annual corrugator thruput of 2,100,000 1000-square feet per year. Consistent with the T-BACT determination, corrugator throughput is limited to 2,100,000 1000-square feet per year on a 12-month rolling basis. To demonstrate compliance with this production limit, the facility owner or operator must monitor and record the corrugator thruput on a monthly basis. Records of annual thruput must be kept for a period of at least 5 years and made available to the Department upon request.

If the rolling total throughput exceeds the specified limit, the facility owner or operator must notify the Department and submit a revised T-BACT analysis accounting for the proposed increase within 30 days of the notification. Otherwise, a revised air dispersion modeling analysis and/or T-BACT analysis must be submitted with the permit renewal application. The revised T-BACT must review the supporting information used to determine formaldehyde emissions including whether newer testing data or emission factors are available. The Department reserves the right to require stack testing to confirm the formaldehyde emission rate at any time.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: PAPER

Upper Permit Limit: 2100000 1000 square feet

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration

Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR 212-2.4 (b)

Item 17.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

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Emission Unit: C-00001	Emission Point: 00RF1
Emission Unit: C-00001	Emission Point: 00RF2
Emission Unit: C-00001	Emission Point: 00RF3
Emission Unit: C-00001	Emission Point: 00RF4
Emission Unit: C-00001	Emission Point: 00RF5
Emission Unit: S-00001	Emission Point: 00S01

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

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.050 grains per dscf
 Reference Test Method: Method 5
 Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 18: Emission Point Definition By Emission Unit
 Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 18.1:

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

Emission Unit: B-00001

Emission Point: 00B01

Height (ft.): 37 Diameter (in.): 19
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Item 18.2:

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

Emission Unit: B-00002

Emission Point: 00B02

Height (ft.): 37 Diameter (in.): 25
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Item 18.3:

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

Emission Unit: C-00001

Emission Point: 00RF1

Height (ft.): 23 Diameter (in.): 54
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Emission Point: 00RF2

Height (ft.): 23 Diameter (in.): 54
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Emission Point: 00RF3

Height (ft.): 23 Diameter (in.): 27
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Emission Point: 00RF4

Height (ft.): 23 Diameter (in.): 27
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Emission Point: 00RF5

Height (ft.): 23 Diameter (in.): 27
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Item 18.4:

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

Emission Unit: S-00001

Emission Point: 00S01

Height (ft.): 51 Length (in.): 12 Width (in.): 12
 NYTMN (km.): 4765.069 NYTME (km.): 238.061 Building: BLDG1

Condition 19: Process Definition By Emission Unit

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Facility DEC ID: 8180200069

Effective between the dates of 08/27/2021 and 08/26/2031

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 19.1:

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

Emission Unit: B-00001
 Process: B01 Source Classification Code: 1-02-006-02
 Process Description:
 Natural gas combustion in a boiler to provide steam heat to process operations.

Emission Source/Control: 00B01 - Combustion
 Design Capacity: 20.922 million Btu per hour

Item 19.2:

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

Emission Unit: B-00002
 Process: B02 Source Classification Code: 1-02-006-02
 Process Description:
 Natural gas combustion in a boiler to provide steam heat to process operations.

Emission Source/Control: 00B02 - Combustion
 Design Capacity: 10.5 million Btu per hour

Item 19.3:

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

Emission Unit: C-00001
 Process: C01 Source Classification Code: 3-07-013-99
 Process Description:
 Production of corrugated paper using a corrugator machine with scrap paper collection system.

Emission Source/Control: 00C01 - Process
 Design Capacity: 5,580.12 million square feet per year

Item 19.4:

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

Emission Unit: S-00001
 Process: S01 Source Classification Code: 3-07-013-99
 Process Description:
 Mixing and preparation of starch-based adhesive for the corrugation process.

Emission Source/Control: 00S01 - Process
 Design Capacity: 6,954 tons per year

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