

**Division of Air Resources  
Permit Review Report**

**Permit ID: 5-5326-00004/00049**

**Renewal Number: 4**

**09/17/2021**

**Facility Identification Data**

Name: HOLLINGSWORTH & VOSE-EASTON MILL

Address: 3235 CO RTE 113

GREENWICH, NY 12834

**Owner/Firm**

Name: HOLLINGSWORTH & VOSE CO

Address: 112 WASHINGTON ST

EAST WALPOLE, MA 02032-1098, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: BETH A MAGEE

Address: NYSDEC - WARRENSBURG SUBOFFICE

232 GOLF COURSE RD

WARRENSBURG, NY 12885-1172

Phone:5186231281

Division of Air Resources:

Name: RANDY L LAROSE

Address: 232 GOLF COURSE RD

WARRENSBURG, NY 12885

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Air Permitting Facility Owner Contact:

Name: VIRGINIA L HAWRYSZ

Address: HOLLINGSWORTH & VOSE CO

3235 CO RTE 113

GREENWICH, NY 12834

Phone:5186958175

**Permit Description**

**Introduction**

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

**Summary Description of Proposed Project**

Application for renewal of Air Title V Facility. This application includes a reduction in facility wide PTE for formaldehyde. This reduction is attributed to reformulation of formaldehyde containing coatings in accordance with T-BACT and improvements to paper machine no. 10's wet scrubber performance. Formaldehyde application rate limits have been added to this permit as T-BACT limits to assure the lower

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emission rates are continuously achieved.

**Attainment Status**

HOLLINGSWORTH & VOSE-EASTON MILL is located in the town of EASTON in the county of WASHINGTON.

The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

\* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

\*\* NOx has a separate ambient air quality standard in addition to being an ozone precursor.

**Facility Description:**

Hollingsworth & Vose Company's Easton Mill is a manufacturer of technical industrial papers and non-woven fabrics. The facility operates three paper machines which form, coat/saturate, and in some cases cure the products made. The facility has two boilers, both of which are capable of burning No. 6 fuel oil or Natural Gas.

**Permit Structure and Description of Operations**

The Title V permit for HOLLINGSWORTH & VOSE-EASTON MILL is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants

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that is not included in the above categories.

HOLLINGSWORTH & VOSE-EASTON MILL is defined by the following emission unit(s):

Emission unit UPAPER - Paper making operations on Paper Machine Nos. 8, 9 and 10. This includes forming, drying and coating/saturating of a paper or fabric web on each of the three machines. Paper Machine Nos. 8, 9 and 10 also have natural gas fired curing units to enhance sheet properties through additional drying.

Emission unit UPAPER is associated with the following emission points (EP):

008A1, 008A2, 008A3, 008A4, 008A5, 008A6, 009A1, 009A2, 009A3, 010A1, 010A2, 010A3, 09C10  
Process: 016 is located at FIRST, Building EASTON MIL - Various coatings/binders may be applied to the paper web at different points, depending upon the machine being used and the formulation being made. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units. Emissions from Paper Machine No. 10's "dry-end" (DRY10) are vented to wet scrubber (010CS) and exhausted through emission point 09C10.

Process: 017 is located at Building EASTON MIL - This process includes web coating operations that coat both paper and non-woven substrate (greater than 10% by mass). This web coating line is subject to 40 CFR 63, Subpart OOOO, when applying organic HAP containing coatings.

Various coatings/binders may be applied to the web at different points, depending on the machine and the formulation being used. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units.

Process: 0AA is located at Easton Mill, Building EASTON MIL - On No. 8 Paper Machine, a wet web of paper passes over steam heated can dryers. For some papers, sprays are applied (see Process ID AAA). For some papers, infrared curing is used to enhance paper properties. Exhausts are vented to 4 emission points on roof. In addition, 2 emission points may be added to this source as previously approved.

Process: 0BB is located at FIRST, Building EASTON MIL - On Paper Machine No. 9 wet end, a wet web of paper is formed and passes over steam heated can dryers. For some papers, sprays are applied (see Process ID 016). The exhausts are vented to 3 emission points on roof.

Process: 0CC is located at FIRST, Building EASTON MIL - On Paper Machine No. 10 a wet web of paper is formed and passes over steam heated can dryers and thru-dryer. The exhausts are vented to 3 emission points on roof.

Process: AAA is located at Easton Mill, Building EASTON MIL - Coatings are sprayed onto the paper web on Paper Machine No. 8.

Emission unit UBOILR - Two (2) boilers with combined heat input capacity of 75.9 mmBtu/hr fired with either No. 6 fuel oil or natural gas.

Emission unit UBOILR is associated with the following emission points (EP):

00018

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Process: 001 is located at FIRST, Building BOILERHOUS - Two large boilers whose combined heat input capacity is 75.9 MMBtu/hr; this process involves firing them with No. 6 fuel oil. When No 6 fuel is fired, other than gas curtailments or for periodic testing (not to exceed 48 hours in a calendar year), the boiler is operating in accordance with 40 CFR 63, Subpart DDDDD, liquids fuel subcategory (specifically Heavy fuels).

Process: 002 is located at FIRST, Building BOILERHOUS - Two large boilers whose combined heat input capacity is 75.9 mmbtu/hr; this process involves firing them with natural gas. When No. 6 fuel oil fired during gas curtailments or for periodic testing (not to exceed 48 hours in a calendar year), the boiler is operating in accordance with 40 CFR 63, Subpart DDDDD, Gas 1 subcategory.

Emission unit UBROKE - Broke is processed for reuse in paper making operations. It is first broken down using caustic and steam heat in a beater type mixer (PR 003) vented to emission point 00024. Then washed in a process also using caustic and steam heat in a beater type mixer (PR 004) vented to emission point 00025.

Emission unit UBROKE is associated with the following emission points (EP):  
00024, 00025

Process: 003 is located at FIRST, Building EASTON MIL - Exhaust vent from broke beater. Caustic is added to broke and broke is steam heated. Vapors are vented to outside air.

Process: 004 is located at FIRST, Building EASTON MIL - Exhaust vent from broke wash beater. Caustic is added to broke and broke is steam heated. The vapors are vented to the outside air.

Emission unit UMIXRS - Chemical mixing exhaust system - includes one mixing tank (ES MIXR1) used for mixing of ingredients such as clay and titanium dioxide with liquid ingredients and vented to Emission Point No. 009A7.

Emission unit UMIXRS is associated with the following emission points (EP):  
009A7

Process: 00A is located at FIRST, Building EASTON MIL - Chemical mixing of ingredients such as clay and titanium dioxide.

**Title V/Major Source Status**

HOLLINGSWORTH & VOSE-EASTON MILL is subject to Title V requirements. This determination is based on the following information:

Hollingsworth & Vose Company's Easton Mill is classified as a major stationary source under Title V. This determination is based on the following information:

- Hollingsworth & Vose Company's Easton Mill has the potential to emit Sulfur Dioxide of 169 tons per year which exceeds the major source threshold of 100 tons per year..

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**Program Applicability**

The following chart summarizes the applicability of HOLLINGSWORTH & VOSE-EASTON MILL with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

**NOTES:**

**PSD** Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NSR** New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

**NESHAP** National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

**MACT** Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

**NSPS** New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

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Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

**Compliance Status**

Facility is in compliance with all requirements.

**SIC Codes**

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

**SIC Code**

**Description**

2621	PAPER MILLS EXC BUILDING PAPER
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**SCC Codes**

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information.Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

**SCC Code**

**Description**

1-02-004-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr

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3-07-999-01	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - OTHER NOT CLASSIFIED PULP & PAPER & WOOD PRODUCTS:OTHER NOT CLASSIFIED
3-07-999-99	BATTERY SEPARATORS PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - OTHER NOT CLASSIFIED SEE COMMENT **
4-02-013-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing

**Facility Emissions Summary**

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

<b>Cas No.</b>	<b>Contaminant</b>	<b>PTE lbs/yr</b>	<b>PTE tons/yr</b>	<b>Actual lbs/yr</b>	<b>Actual tons/yr</b>
000107-21-1	1,2-ETHANEDIOL	37			
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	436			
0NY507-00-0	40 CFR 63 SUBPART DDDDD TOTAL SELECTED METALS	133			
000108-05-4	ACETIC ACID ETHENYL ESTER	82			
007664-41-7	AMMONIA	10293			
000098-82-8	BENZENE, (1-METHYLETHYL)	730			
000630-08-0	CARBON MONOXIDE	19723			
000111-42-2	ETHANOL, 2,2'-IMINOBISETHYLENE	106			
000100-41-4	ETHYLBENZENE	730			
000079-06-1	ETHYLENE CARBOXAMIDE	0.2			

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000050-00-0	FORMALDEHYDE	3585
007647-01-0	HYDROGEN CHLORIDE	731
007439-97-6	MERCURY	1.33
000067-56-1	METHYL ALCOHOL	2037
0NY210-00-0	OXIDES OF NITROGEN	166000
0NY075-00-0	PARTICULATES	34904
0NY075-02-5	PM 2.5	14425
0NY075-00-5	PM-10	44822
000107-13-1	PROPENENITRIL E	2
001310-73-2	SODIUM HYDROXIDE	496
007446-09-5	SULFUR DIOXIDE	338000
007664-93-9	SULFURIC ACID	261
013463-67-7	TITANIUM DIOXIDE	963
0NY100-00-0	TOTAL HAP	7800
000057-13-6	UREA	973
000075-01-4	VINYL CHLORIDE	53
0NY998-00-0	VOC	8773

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**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 Part 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 Part 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 Part 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



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renewal application.

- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 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 Part 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 Part 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.

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

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

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this 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 Part 2 01-6.7 and Part 621.
- 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 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.

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**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**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\_02

**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.

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**Regulatory Analysis**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
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FACILITY	ECL 19-0301	90	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-JJJJ	39	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
FACILITY	40CFR 63- DDDDD.7495 (d)	40	ICI Boiler Major Source NESHAP - Notification Requirements
FACILITY	40CFR 63- DDDDD.7500 (a) (	41, 42, 43, 44, 45, 46	ICI Boiler Major Source NESHAP - Emission Limits and Management Practices
FACILITY	40CFR 63- DDDDD.7500 (a) (	47	ICI Boiler Major Source NESHAP - Operating Limits
FACILITY	40CFR 63- DDDDD.7500 (a) (	48	ICI Boiler Major Source NESHAP - Good Air Pollution Control Practices
FACILITY	40CFR 63- DDDDD.7505 (d)	49	ICI Boiler Major Source NESHAP - Site-Specific Monitoring Plan
FACILITY	40CFR 63- DDDDD.7510 (e)	50	ICI Boiler Major Source NESHAP - Initial Compliance Date for Existing Sources
FACILITY	40CFR 63- DDDDD.7525 (d)	51	ICI Boiler Major Source NESHAP - Continuous Monitoring System
FACILITY	40CFR 63- DDDDD.7530 (b)	52	ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Performance Testing
FACILITY	40CFR 63- DDDDD.7530 (e)	53	ICI Boiler Major Source NESHAP - Certification of Energy Assessment
FACILITY	40CFR 63- DDDDD.7530 (h)	54	ICI Boiler Major Source NESHAP - Work Practice Standards
FACILITY	40CFR 63- DDDDD.7540 (a)	55	ICI Boiler Major Source NESHAP - Continuous Compliance
FACILITY	40CFR 63- DDDDD.7540 (a) (	56	ICI Boiler Major Source NESHAP - Tune-Up Requirements
FACILITY	40CFR 63-	57	ICI Boiler Major

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	DDDDD.7540 (a) (		Source NESHAP - Tune-
FACILITY	40CFR 63-	58	up Requirements
	DDDDD.7545 (d)		ICI Boiler Major
			Source NESHAP -
FACILITY	40CFR 63-	59	Performance Test
	DDDDD.7545 (e)		Notification
			ICI Boiler Major
FACILITY	40CFR 63-	60	Source NESHAP -
	DDDDD.7545 (f)		Notification of
			Compliance Status
FACILITY	40CFR 63-	61	ICI Boiler Major
	DDDDD.7545 (h)		Source NESHAP - Use
			of Alternative Fuel
FACILITY	40CFR 63-	62	Notification
	DDDDD.7550 (b)		ICI Boiler Major
			Source NESHAP -
FACILITY	40CFR 63-	63	Reporting
	DDDDD.7550 (c)		Requirements
			ICI Boiler Major
FACILITY	40CFR 63-	64	Source NESHAP -
	DDDDD.7550 (e)		Compliance Reports
			ICI Boiler Major
FACILITY	40CFR 63-	65	Source NESHAP -
	DDDDD.7550 (h)		Deviation Reporting
			at Facilities Using
FACILITY	40CFR 63-	66	CMS
	DDDDD.7555 (a)		ICI Boiler Major
			Source NESHAP -
FACILITY	40CFR 63-	67	Performance tests and
	DDDDD.7555 (c)		CEMS reporting
			ICI Boiler Major
FACILITY	40CFR 63-	68	Source NESHAP -
	DDDDD.7555 (d)		Recordkeeping
			ICI Boiler Major
FACILITY	40CFR 63-	69	Source NESHAP -
	DDDDD.7555 (e)		Monitoring Data
			Recordkeeping
FACILITY	40CFR 63-	70	ICI Boiler Major
	DDDDD.7560		Recordkeeping for
			Units Subject to
FACILITY	40CFR 63-	71	Emission Limits
	DDDDD.7565		ICI Boiler Major
			Source NESHAP -
FACILITY	40CFR 63-	73	Emission Averaging
	JJJJ.3320 (b) (3		Recordkeeping
			ICI Boiler Major
FACILITY	40CFR 63-	74	Source NESHAP -
	JJJJ.3370 (c)		Record Format
			ICI Boiler Major
			Source NESHAP -
			General Provisions
			Paper and Other Web
			Coating NESHAP -
			Emission standard -
			mass of coating
			solids option
			Paper and Other Web
			Coating NESHAP -
			Compliance
			demonstration for as-

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FACILITY	40CFR 63- JJJJ.3400 (c) (2)	75	applied "compliant" coating materials Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.3410 (a)	76	Paper and Other Web Coating NESHAP - Record keeping requirements.
FACILITY	40CFR 63-JJJJ.Tbl 2	72	Subpart A requirements for Subpart JJJJ
FACILITY	40CFR 63- OOOO.4291 (a) (2)	77	Fabric printing, coating, dyeing NESHAP: Emission rate without add-on controls option
U-PAPER/-/017	40CFR 63-OOOO.4301	89	Fabric Coating/Printing/Dyei ng NESHAP - General Provisions
FACILITY	40CFR 63-OOOO.4311 (f)	78	Fabric Printing/Coating/Dyei ng NESHAP -
FACILITY	40CFR 63-OOOO.4311 (g)	79	Electronic Reporting Fabric Printing/Coating/Dyei ng NESHAP -
FACILITY	40CFR 63-OOOO.4311 (h)	80	Electronic Reporting System Outage Fabric Printing/Coating/Dyei ng NESHAP -
FACILITY	40CFR 63-OOOO.4312	81	Electronic Reporting During Force Majeure Events Fabric Coating/Printing/Dyei ng NESHAP -
FACILITY	40CFR 63-ZZZZ	82	Recordkeeping Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	18	Chemical accident prevention provisions
FACILITY	40CFR 82-F	19	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	91	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	13	Exempt Activities - Proof of eligibility

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FACILITY	6NYCRR 201-3.3 (a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	20, 83, 84	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	15	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	16	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	3	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	21	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	22, 23	Operational Flexibility
FACILITY	6NYCRR 201-6.5 (a)	92	State Enforceable Requirements
FACILITY	6NYCRR 201-7	24	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-1.1	17	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.5	8	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	93	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	28	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.3	94	Determination of Environmental Rating
FACILITY	6NYCRR 212-1.5 (d)	29, 30, 31, 32	BACT or T-BACT for process emission sources
U-PAPER	6NYCRR 212-1.5 (e) (2)	103	Demonstrating compliance for Part 212 through the federal NESHAP program
FACILITY	6NYCRR 212-1.5 (g)	95	Maintain all process emission sources, including the associated air pollution control and monitoring equipment
FACILITY	6NYCRR 212-1.6 (a)	96	Limiting of Opacity
FACILITY	6NYCRR 212-1.7 (a)	97	Emission Testing Using Approved Procedures

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FACILITY	6NYCRR 212-2.1	98	Requirements
FACILITY	6NYCRR 212-2.1 (a)	99, 100, 101	HTACs applicable to Table 212-2.3 Table 4
FACILITY	6NYCRR 212-2.4 (b)	102	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (c)	33	Sulfur-inFuel Limitations -
FACILITY	6NYCRR 225-1.2 (d)	34	Residual Oil Sulfur-in-Fuel Limitation -
FACILITY	6NYCRR 227-1.4 (a)	35	Distillate Oil Opacity Standard
U-BOILER/00018	6NYCRR 227-1.4 (a)	85	Opacity Standard
U-PAPER/-/016	6NYCRR 228-1.3 (b) (1)	86	General Requirements - Record Keeping
FACILITY	6NYCRR 228-1.3 (d)	36	Surface Coating General Requirements- Handling, storage and disposal
FACILITY	6NYCRR 228-1.4 (d) (2)	37	VOC limits for magnetic wire, metal can, coil, vinyl and fabric
FACILITY	6NYCRR 228-1.4 (d) (3)	38	VOC limits for Paper Film & Foil coatings
U-PAPER/-/016	6NYCRR 228-1.6 (a)	87	Surface coating VOC analysis.
U-PAPER/-/016	6NYCRR 228-1.6 (h)	88	Records reporting and maintaining

**Applicability Discussion:**

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical



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6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of

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sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calENdar year.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

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40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

**Facility Specific Requirements**

In addition to Title V, HOLLINGSWORTH & VOSE-EASTON MILL has been determined to be subject to the following regulations:

40 CFR 63.3320 (b) (3)

This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3370 (c)

This citation states the procedures for demonstrating compliance with the as-applied compliant coating materials option.

40 CFR 63.3400 (c) (2)

This condition spells out the information that needs to be submitted in the semi-annual compliance reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.3410 (a)

This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.4291 (a) (2)

This citation states the emission limits for web coating and printing sources without add-on controls.

40 CFR 63.4301

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This citation states the applicability of the general provisions to Part 63.

40 CFR 63.4311 (f)

This citation states the requirements for electronic reporting for Subpart OOOO.

40 CFR 63.4311 (g)

This citation states the reporting requirements when there is an outage of the electronic reporting system.

40 CFR 63.4311 (h)

This citation states the reporting requirements during force majeure events.

40 CFR 63.4312

This citation states the recordkeeping requirements for Subpart OOOO.

40 CFR 63.7495 (d)

This condition states the notification requirements of the boiler MACT.

40 CFR 63.7500 (a) (1)

These conditions state what emission limits and management practices affected sources with which the owner or operator must comply

40 CFR 63.7500 (a) (2)

These conditions state the operating limits owners or operators of industrial, commercial, or institutional boilers must follow

40 CFR 63.7500 (a) (3)

This condition states that the owner or operator must operate and maintain the affected source consistent with good air control practices

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40 CFR 63.7505 (d)

This condition states that owners or operators of industrial, commercial, and institutional boilers who demonstrate compliance with any applicable emission limit through stack testing and subsequent compliance with operating limits must develop a site-specific monitoring plan

40 CFR 63.7510 (e)

This condition states that the owner or operator must demonstrate initial compliance no later than 180 days after the compliance date

40 CFR 63.7525 (d)

This condition states the procedures to install, operate, and maintain a continuous parameter monitoring system

40 CFR 63.7530 (b)

This citation states the requirements to establish site-specific operating limits and conduct fuel analyses.

40 CFR 63.7530 (e)

This citation states that the notification of compliance status must include information on the energy assessment.

40 CFR 63.7530 (h)

This citation states the applicability of work practice standards.

40 CFR 63.7540 (a)

This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7540 (a) (10)

This citation states the tune-up requirements for boilers and process heaters greater than 10 mmBtu/hr.

40 CFR 63.7540 (a) (12)

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This citation specifies the tune-up requirements for boilers equipped with continuous oxygen trim systems that maintain optimum air to fuel ratios and that are subject to the requirements of 40 CFR 63 Subpart DDDDD.

40 CFR 63.7545 (d)

This condition states when a notification of intent to conduct a performance test must be submitted

40 CFR 63.7545 (e)

This condition states the requirements of the notification of compliance status

40 CFR 63.7545 (f)

This condition states the notification requirements for owners and operators that plan to switch from gas 1 category fuels to another fuel

40 CFR 63.7545 (h)

This condition states the notification requirements for owners and operators intending to switch fuel subcategories

40 CFR 63.7550 (b)

This condition states when reports must be submitted.

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR 63.7550 (e)

This condition states the requirements for reporting deviations at facilities using a continuous monitoring system

40 CFR 63.7550 (h)

This citation states the procedures for submitting reports.

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40 CFR 63.7555 (a)

This condition states what records must be kept

40 CFR 63.7555 (c)

This condition states the recordkeeping requirements for monitored data

40 CFR 63.7555 (d)

This condition states the recordkeeping requirements for boilers and process heaters subject to emission limits

40 CFR 63.7555 (e)

This condition states the recordkeeping requirements for owners or operators that elect to average emissions

40 CFR 63.7560

This condition states in what form the records must be kept

40 CFR 63.7565

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of industrial, commercial, and institutional boilers at major source facilities of hazardous air pollutants.

40 CFR 63.Tbl 2

This condition refers the applicant to the requirements of 40 CFR 63 Subpart A that are applicable to facilities subject to 40 CFR 63 Subpart JJJJ.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ

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must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation Law may be included in future versions of this permit, as applicable.

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.3

Based upon the following requirements, all air contaminants will assigned an Environmental Rating from A to D.

- (a) Toxic and other properties and emission rate potential of the air contaminant;
- (b) location of the process emission source or emission point(s) for the air contaminant with respect to residences or other sensitive environmental receptors, taking into account the area's anticipated growth;
- (c) emission dispersion characteristics at or near the process emission source or emission point(s), taking into account the physical location of the process emission source or emission point(s) relative to the surrounding buildings and terrain; and
- (d) the projected maximum cumulative impact of an air contaminant taking into account emissions from all process emission sources at the facility under review and the pre-existing ambient concentration of the air contaminant under review.

6 NYCRR 212-1.5 (d)

This provision allows for the department to specify a less restrictive permissible



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emission rate or degree of air cleaning for the process emission source or emission point than required under Subpart 212-2 in instances where a facility owner or operator can demonstrate to the satisfaction of the department that the facility owner will apply the Best Available Control Technology (BACT) for that criteria air contaminant or the Best Available Control Technology for a toxic air contaminant (T- BACT).

6 NYCRR 212-1.5 (e) (2)

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) satisfies the requirements of Part 212 for the respective air contaminant regulated by the Federal standard.

However, NESHAPs regulating High Toxicity Air Contaminants (HTACs) must provide evidence 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.

6 NYCRR 212-1.5 (g)

This provision requires the facility owner or operator to operate and maintain all process emission sources, including the associated air pollution control and monitoring equipment, in a manner consistent with safety, good air pollution control practices, good engineering practices and manufacturers' recommendations for minimizing emissions.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

6 NYCRR 212-1.7 (a)

This provision requires facility owners and/or operators of a process emission source who are demonstrating compliance be required to conduct capture efficiency and/or stack emissions testing using acceptable and approved procedures pursuant to Part 202 of this Title.

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6 NYCRR 212-2.1

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:

- (a) For an air contaminant listed in section 212-2.2 table 2 – high toxicity air contaminant list, of this Subpart, the facility owner or operator shall either 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; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants, of this Subpart for the environmental rating assigned to the contaminant by the department.
- (b) For any air contaminant not listed on table 2, unless it is a solid particulate described in subdivision (c) of this section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in subdivision 212-2.3(a), table 3 – degree of air cleaning required for criteria air contaminants of this Subpart, or subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants of this Subpart, as applicable, for the environmental rating assigned to the contaminant by the department.
- (c) For a solid particulate assigned an environmental rating of B or C emitted from a process emission source, the facility owner or operator shall not allow emissions of particulate to exceed the requirements specified in section 212-2.4 of this Subpart.

6 NYCRR 212-2.1 (a)

This provision is for an air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List (HTAC). The facility owner or operator must either 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; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 225-1.2 (c)

This subdivision sets the sulfur-in-fuel limitation for residual oil fired emission sources throughout the State.

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6 NYCRR 225-1.2 (d)

This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 228-1.3 (b) (1)

This regulation requires the facility owner or operator to maintain a certification from the coating manufacturer that contains the information used to determine the as-applied volatile organic compound content of the coating. In addition, the facility owner or operator is required to maintain records of other information used to determine compliance with Part 228-1.

6 NYCRR 228-1.3 (d)

This citation directs the owners or operators of coating operations to minimize the emissions of volatile organic compounds to the atmosphere by properly handling, storing and disposing of coatings containing volatile organic compounds.

6 NYCRR 228-1.4 (d) (2)

This citation lists the VOC content limits for Class D coating lines.

6 NYCRR 228-1.4 (d) (3)

The citation specifies the maximum VOC content of a coating allowed when coating paper, film or foil.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the

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regulation.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

**Compliance Certification**

**Summary of monitoring activities at HOLLINGSWORTH & VOSE-EASTON MILL:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
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FACILITY	41	record keeping/maintenance procedures
FACILITY	42	intermittent emission testing
FACILITY	43	intermittent emission testing
FACILITY	44	intermittent emission testing
FACILITY	45	intermittent emission testing
FACILITY	46	intermittent emission testing
FACILITY	47	record keeping/maintenance procedures
FACILITY	49	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	record keeping/maintenance procedures
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	record keeping/maintenance procedures
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	record keeping/maintenance procedures
FACILITY	66	record keeping/maintenance procedures
FACILITY	67	record keeping/maintenance procedures
FACILITY	68	record keeping/maintenance procedures
FACILITY	69	record keeping/maintenance procedures
FACILITY	70	record keeping/maintenance procedures
FACILITY	73	work practice involving specific operations
FACILITY	74	record keeping/maintenance procedures
FACILITY	75	record keeping/maintenance procedures
FACILITY	76	record keeping/maintenance procedures
FACILITY	77	work practice involving specific operations

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FACILITY	81	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	25	monitoring of process or control device parameters as surrogate
FACILITY	26	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	94	record keeping/maintenance procedures
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	31	monitoring of process or control device parameters as surrogate
FACILITY	32	monitoring of process or control device parameters as surrogate
U-PAPER	103	record keeping/maintenance procedures
FACILITY	96	monitoring of process or control device parameters as surrogate
FACILITY	97	intermittent emission testing
FACILITY	98	record keeping/maintenance procedures
FACILITY	99	record keeping/maintenance procedures
FACILITY	100	record keeping/maintenance procedures
FACILITY	101	monitoring of process or control device parameters as surrogate
FACILITY	102	monitoring of process or control device parameters as surrogate
FACILITY	33	work practice involving specific operations
FACILITY	34	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
U-BOILR/00018	85	monitoring of process or control device parameters as surrogate
U-PAPER/-/016	86	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	work practice involving specific operations
FACILITY	38	work practice involving specific operations
U-PAPER/-/016	87	record keeping/maintenance procedures
U-PAPER/-/016	88	record keeping/maintenance procedures

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**Basis for Monitoring**

Title V permits must contain sufficient periodic monitoring to assure compliance with the applicable requirements. In some cases, in order to provide reasonable compliance assurance with applicable requirements, it is necessary to develop facility specific operating/monitoring activities/conditions, which may include testing, monitoring, work practices, recordkeeping and reporting requirements. The basis of monitoring for these permit conditions is as follows:

**Applicable Requirement: 6 NCYRR 225-1.2(c) – Fuel Sulfur Limit**

The purchase of residual fuel oil (or No. 6 fuel oil in this case) containing more than .5% sulfur as fuel for the boilers at the facility is prohibited. Source owner must be able to document that each

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shipment of oil received meets this requirement. The main purpose of this is to mitigate emissions of sulfur dioxide and particulate matter when burning residual oil.

**Applicable Requirement: 6 NYCRR 227-1.4(a) – Boiler Opacity Limit**

Opacity (visible emissions) from the boiler stack shall be less than 20%, except for one 6-minute period per hour of not more than 27%. Opacity is used as a surrogate to indicate the level of particulate matter being emitted from the source. Since a Continuous Opacity Monitor (COM) is not utilized, compliance with this limit will be demonstrated through daily observations of visible emissions from the boiler stack. If visible emissions are observed during daily VEOs, the operator will be alerted by the unusual condition and address the situation. In addition, the Department requires annual Method 9 visible emission observation for combustion sources at title V facilities.

In accordance with 40 CFR 63 Subpart DDDDD, until notification of a fuel switch is made the boilers are permitted as natural gas-fired only. Therefore, no visible emissions (other than a steam plume) are anticipated except, potentially, during the limited usage of No. 6 fuel for gas curtailment and maintenance.

**Applicable Requirements: 6 NYCRR 228-1.4(d)(2) and (3) – VOC Coating Limits**

The source owner is required to maintain certifications from their supplier or manufacturer to verify the information used to calculate the as applied Volatile Organic Compound (VOC) content of each of the coatings used at the facility. VOC content limits are specified in tables D-1 and D-2. In order to assure continuous compliance, as applied VOC content are calculated when raw materials or formulations change. Purchase, usage and/or production records for coating materials must also be maintained for further verification.

**Applicable Requirements: 6 NYCRR 212-1.6(a) and 6 NCYRR 212-2.4(b) – Process Source Opacity Limit**

Daily check of visible emissions from process sources and coating lines will be performed at the facility. This will help to ensure that the 20% opacity limit is being met and should help to alert the source owner to unusual process conditions that might result in excess emissions if left unchecked. However, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at its discretion.

Typically, there are no visible emissions (other than a steam plume) associated with the facility's Part 212 process sources and Part 228 coating processes. If visible emissions were observed during daily VEOs, the operator would be alerted by the unusual condition and address the situation. Similarly, this monitoring activity serves to provide reasonable compliance assurance

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with the emission standard of 0.05 grains/dscf, for B & C – rated particulate in accordance with 6 NYCRR 212-2.4(b).

**Applicable Requirements: 6 NYCRR 212-1.5(d), 6 NYCRR 212.1.7(a) and 6 NYCRR 212-2.1 – Required Degree of Control for High Toxic Air Contaminants**

Formaldehyde, a high toxicity air contaminant (HTAC), is emitted from certain coating operations at an hourly potential of 0.44 pounds. Part 212 compliance options for HTACs include: limiting actual annual emissions from coating process operations at the facility so as to not exceed the mass emission limit listed in Part 212-2, Table 2, for the contaminant; demonstrating compliance with the air cleaning requirements as 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; or complying with a Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under Part 63 for the respective air contaminant regulated by the Federal standard and to provide a toxic impact assessment (TIA) demonstrating that the maximum offsite ambient air concentration is less than the AGC/SGC.

The owner or operator has selected the compliance option of 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. Formaldehyde has been assigned an Environmental Rating of “A” for the associated process emission sources/emission point in accordance with Part 212-1.3. Since Formaldehyde has been demonstrated to have an emission rate potential (ERP) in the range greater than or equal to 0.1 - 1.0 pounds per hour, it requires 90% control or Toxic - Best Available Control Technology (T-BACT), as provided in 212-1.5(d).

In accordance with Part 212-1.2(b)(20) and the Division of Air Resources’ procedures for implementing Part 212 (DAR-1), T-BACT has been determined to include operating parameters and work practices for these process emission sources. Specifically, T-BACT has historically been, and continues to be, the construction and operation of an 87 foot stack (EP 09C10) to reduce ambient air concentration, the transition, where possible, to reformulated coatings with lower (or no) formaldehyde content and the proper operation of Paper Machine No. 10's wet scrubber (ES 010SC) to reduce emissions. To assure continuous compliance with these T-BACT requirements, limits have been established on the maximum formaldehyde application rates allowed for each family of grades with formaldehyde containing coatings (i.e., Process 16 - filter and reformulated filter grades and Process 17 - filter and non-woven grades) and a minimum scrubber water flow rate. The application rates and scrubber flow rate must be monitored continuously. These limits shall be re-evaluated in association with once per term formaldehyde stack testing and ambient air dispersions analysis of the worst-case family of grades. The stack testing frequency of once per term is determined appropriate, based on the consistency of stack test results during previous permit terms. These T-BACT requirements have resulted in a

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reduction in the 1 –hour and annual Formaldehyde PTE of 1.36 and 3316 pounds, respectively and consequently short and long-term ambient air concentrations.

**Applicable Requirement: 6 NYCRR 201-7 – Federally Enforceable Emission Caps**

Emissions of Oxides of Nitrogen (NO<sub>x</sub>) from this facility are capped at no greater than 83 tons per year. By keeping NO<sub>x</sub> emissions low, the facility is not subject to additional Reasonably Available or Best Available Control Technology or Lowest Achievable Emission Rate (RACT, BACT or LAER) requirements contained in State RACT (6NYCRR 227-2) or Federal Prevention of Significant Deterioration (PSD, 40CFR 52) or State New Source Review (6NYCRR Part 231-2) rules. Compliance with this cap must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

Emissions of Sulfur Dioxide (SO<sub>2</sub>) from this facility are capped at no greater than 169 tons per year. By keeping SO<sub>2</sub> emissions below this level, the facility is not subject to additional BACT requirements contained in Federal PSD rules. Compliance with this cap must be monitored monthly through emissions calculations performed by the source owner for comparison to the limit.

There are no specific permit conditions requiring NO<sub>x</sub> and SO<sub>2</sub> stack test during this permit term. The basis for this determination is that current actual emissions are very low with respect to emission caps. In addition, the permitted caps are established well below the regulatory thresholds. This provides an additional buffer to support the use of USEPA's AP-42 emission factors in determining emissions. Stack testing, however, could be required upon request by the Department should conditions warrant.

**40 CFR 60 Subpart JJJJ and 40 CFR 63 Subpart ZZZZ**

This facility has (2) emergency power generating stationary internal combustion engines that are exempt under 201-3.2(c)(6) and one (1) fire pump which is exempt under 201-3.2(c)(3)(ii) .

The permit exempt engines include: 1) a natural gas-fired 8,000 Watt emergency generator - Mfd. date 2008; 2) a natural gas-fired 22,000 Watt emergency generator - Mfd. date 2019; and 3) a late 1960s – early 1970s, 67.8 bhp. diesel-fired pump.



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