



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

**Facility Identification Data**

Name: HOLLINGSWORTH & VOSE GREENWICH MILL

Address: 2322 ST RTE 29  
CENTER FALLS, 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  
Phone: 5186231212

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 renewal application also includes an annual limit on formaldehyde emissions and updates compliance requirements in accordance with the revised 6 NYCRR Part 212 for General Processes.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

The facility is redesignated as an Area source for Hazardous Air Pollutants (HAPs). This was accomplished through process changes which have lowered the facility's Potential to Emit (HAPs) below major source thresholds.

**Attainment Status**

HOLLINGSWORTH & VOSE GREENWICH MILL is located in the town of GREENWICH 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 Greenwich facility is a manufacturer of specialty and technical papers. The facility operates one paper machine with several emission points. The facility's is supplied steam by a 25 mmBtu Hurst boiler and a 16 mmBtu Ames boiler. The Hurst boiler's primary fuel is natural gas with No. 2 fuel oil as backup and the Ames boiler fires natural gas only.

**Permit Structure and Description of Operations**

The Title V permit for HOLLINGSWORTH & VOSE GREENWICH 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



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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 that is not included in the above categories.

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

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

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

011A1, 011A2, 011A3, 011A4, 011A5, 011CS

Process: 00C is located at FIRST, Building MILL - On No. 11 paper machine, a wet web of paper is formed and then passes over steam heated can dryers and propane fired thru dryer. The thru dryer is considered a process heater under State rules but not Federal. Combustion gases may come into contact with raw materials.

Process: 0CC is located at Building MILL - Binders are applied to the web of paper in a saturator. The saturated web passes over steam heated can dryers and propane fired infrared unit(s). The infrared unit is considered a process heater under State rules but not Federal. Combustion gases may come into contact with process materials. Exhausts are vented to a common stack (011CS).

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



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

Emission unit UBOILR is associated with the following emission points (EP):  
00008, 00009

Process: 012 is located at Building MILL - This process permits the combustion of No. 2 fuel oil during periods of gas curtailment in accordance with 40 CFR 63, Subpart JJJJJ, for gas only boilers. There are two (2) boilers (16 and 25 mmBtu) which provide process steam for the paper machine.

Process: 013 is located at Building MILL - This process includes two (2) natural gas boilers (16 and 25 mmBtu) which are designated gas-only in accordance with 40 CFR 63, Subpart JJJJJ. These boilers provide process steam for the paper machine.

**Title V/Major Source Status**

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

The facility's major source status was redesignated as an area source with respect to the 40 CFR 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers. This was accomplished through process changes lowering the facility's Potential to Emit (PTE) below major source thresholds prior to the January 31, 2016 compliance date, for major source boilers subject to 40 CFR 63, Subpart DDDDD (NESHAP). In accordance with Subpart JJJJJ, gas fired boilers (defined in §63.11237) are not subject to the standard until a fuel switch is made. The facility's boilers were converted to, and operated as, gas fired boilers since December 2012.

However, the facility remains subject to 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paper and Other Web Coating located at major sources. This standard remains applicable based on EPA's "once in always in" policy" which prevents major sources formerly subject to a standard from "back sliding" (i.e., reducing control) should they later become an area source and subject to lesser control requirements. Furthermore, in accordance with this NESHAP the facility is required to maintain a title V permit.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

**Program Applicability**

The following chart summarizes the applicability of HOLLINGSWORTH & VOSE GREENWICH 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	NO
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



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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.

**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 212.10, 226, 227-2, 228, 229, 230, 232, 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

**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.



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

SCC Code	Description
1-02-005-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - DISTILLATE OIL 10-100MMBTU/HR **
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
3-07-999-99	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

**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.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000107-21-1	1,2-ETHANEDIOL	12464			
000096-23-1	1,3-DICHLORO-2-PROPANOL	0.337			
000140-88-5	2-PROPENOIC ACID, ETHYL ESTER	722			
000075-07-0	ACETALDEHYDE	1160			
000064-19-7	ACETIC ACID	249			
007664-41-7	AMMONIA	9360			
001303-96-4	BORAX NA2(B4O7).10H2O	728			
000630-08-0	CARBON MONOXIDE	8436			
000050-00-0	FORMALDEHYDE	1343			
000067-56-1	METHYL ALCOHOL	6108			
0NY210-00-0	OXIDES OF NITROGEN	24111			
0NY075-00-0	PARTICULATES	1833			
000108-95-2	PHENOL	19104			



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

0NY075-00-5	PM-10	459
000107-13-1	PROPENENITRIL E	3
063148-62-9	SILOXANES AND SILICONES ,DI- ME	731
001310-73-2	SODIUM HYDROXIDE	9718
000100-42-5	STYRENE	6
007446-09-5	SULFUR DIOXIDE	145
007757-82-6	SULFURIC ACID DISODIUM SALT	21
0NY100-00-0	TOTAL HAP	40427
0NY998-00-0	VOC	40921

**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 B: 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



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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 C: 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 D: 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 E: 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 renewal application.

**Item F: 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 G: 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 H: 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 I: 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 J: 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



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item K: 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 201-6.7 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.



New York State Department of Environmental Conservation  
**Permit Review Report**

Permit ID: 5-5334-00006/00035

Renewal Number: 3

03/28/2017

**Item L: 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 M: 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.

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**Item A: 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.

**Regulatory Analysis**

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
FACILITY	ECL 19-0301	55	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-A	33	General provisions



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

U-BOILR/-/012	40CFR 60- Dc.48c(e)(11)	42	Reporting and Recordkeeping requirements - fuel supplier certifications
FACILITY	40CFR 60-Dc.48c(f)(1)	34	Reporting and Recordkeeping Requirements (distillate oil).
FACILITY	40CFR 60-Dc.48c(g)(2)	35	Alternative recordkeeping
U-PAPER/-/0CC	40CFR 63- JJJJ.3320(b)(3)	50	Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
U-PAPER/-/0CC	40CFR 63-JJJJ.3340	51	Paper and Other Web Coating NESHAP -
U-PAPER/-/0CC	40CFR 63-JJJJ.3360(c)	52	General Requirements Paper and Other Web Coating NESHAP -
U-PAPER/-/0CC	40CFR 63- JJJJ.3400(c)(2)	53	Determination of organic HAP content Paper and Other Web Coating NESHAP -
U-PAPER/-/0CC	40CFR 63-JJJJ.3410(a)	54	Semiannual compliance report contents. Paper and Other Web Coating NESHAP -
FACILITY	40CFR 63- JJJJJJ.11225(g)	36	Record keeping requirements. ICI Boiler Area Source NESHAP - Fuel Switching
FACILITY	40CFR 63-ZZZZ	37	Notification Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 63-ZZZZ.6585	38	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	22	- Applicability Chemical accident prevention provisions
FACILITY	40CFR 82-F	23	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	56	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	11, 12	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2(a)	14, 15	Exempt Activities -
FACILITY	6NYCRR 201-3.3(a)	16, 17	Proof of eligibility Trivial Activities -



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

FACILITY	6NYCRR 201-6	24, 39, 40	proof of eligibility Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4(a)(4)	18	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4(a)(7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4(a)(8)	19	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4(c)	3	Recordkeeping and Reporting of Compliance Monitoring Records of
FACILITY	6NYCRR 201-6.4(c)(2)	4	Monitoring, Sampling and Measurement Reporting
FACILITY	6NYCRR 201- 6.4(c)(3)(ii)	5	Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4(d)(4)	25	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4(f)(6)	20	Off Permit Changes
FACILITY	6NYCRR 202-1.1	21	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	26	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	57	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.5(e)(2)	27, 28, 29	Demonstrating compliance for Part 212 through the federal NESHAP program
FACILITY	6NYCRR 212-1.6(a)	30	Limiting of Opacity
FACILITY	6NYCRR 212-2.3(b)	58	Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2(h)	31	Sulfur-in-Fuel Limitations
FACILITY	6NYCRR 227.2(b)(1)	32	Particulate emissions.
U-BOILR	6NYCRR 227-1.3(a)	41	Smoke Emission Limitations.
U-PAPER/-/OCC	6NYCRR 228-1.3(a)	43	Surface Coating General Requirements- Opacity
U-PAPER/-/OCC	6NYCRR 228-1.3(b)(1)	44	General Requirements - Record Keeping
U-PAPER/-/OCC	6NYCRR 228-1.3(d)	45	Surface Coating General Requirements- Handling, storage and



**New York State Department of Environmental Conservation  
Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

U-PAPER/-/0CC	6NYCRR 228-1.4(d)(3)	46	disposal
U-PAPER/-/0CC	6NYCRR 228-1.6(a)	47	VOC limits for Paper Film & Foil coatings
U-PAPER/-/0CC	6NYCRR 228-1.6(c)	48	Surface coating VOC analysis.
U-PAPER/-/0CC	6NYCRR 228-1.6(h)	49	Surface coating access for sampling 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

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.



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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 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) (5)

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



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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 201-6.4 (f) (6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

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.

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**



**New York State Department of Environmental Conservation**  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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

40 CFR 60.48c (e) (11)

If fuel supplier certifications are used to demonstrate compliance with the distillate oil specifications under 40 CFR 60-Dc.41c, then reports shall include a certified statement signed by the owner or operator that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

40 CFR 60.48c (f) (1)

Fuel supplier certifications for distillate oil shall include the name of the oil supplier and a statement from the oil supplier that the oil complies with the specification under the definition of distillate oil in 40 CFR 60-Dc.41c

40 CFR 60.48c (g) (2)

This regulation allows 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 SO<sub>2</sub> 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.

40 CFR 63.11225 (g)

This condition states when a notification must be sent when switching to a different subcategory of fuel and what it must contain.

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 63.3340

40 CFR 63.3360 (c)

This condition requires the facility to calculate the portion of the coating that is organic hazardous air pollutants and spells out which methods are allowable to calculate the content. This condition will ensure that the facility is calculating their emissions of organic HAP in a consistent and easily understandable manner when determining whether they are meeting the emission limits in this subpart.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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 63.6585

This condition details what criteria are used to determine if a reciprocating internal combustion engine is subject to the provisions of this NESHAP rule. If the engine meets the rule's definition of reciprocating internal combustion engine, and is located at a facility that emits at least 10 tons of a single hazardous air pollutant or 25 tons of all hazardous air pollutants, then the engine will need to meet the provisions in this rule.

40 CFR Part 60, Subpart A

This regulation contains the General Provisions of 40 CFR 60. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements

40 CFR Part 63, Subpart ZZZZ

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 212-1.5 (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.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

6 NYCRR 212-1.6 (a)

This provision 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 212-2.3 (b)

Table 4 of 212-2.3 describes the reduction in emissions required for a non-criteria air contaminant based on its uncontrolled emission rate. The uncontrolled emission rate in conjunction with the assigned environmental rating determines the degree of controlled applied.

6 NYCRR 225-1.2 (h)

Sulfur-in-fuel limitation for the firing of distillate oil on or after July 1, 2016.

6 NYCRR 227.2 (b) (1)

This regulation is from the 1972 version of Part 227 and still remains as part of New York's SIP. The rule establishes a particulate limit of 0.10 lbs/mmBtu based on a 2 hour average emission for any oil fired stationary combustion installation.

6 NYCRR 227-1.3 (a)

This regulation prohibits any person from operating a stationary combustion installation which emits smoke equal to or greater than 20% opacity except for one six-minute period per hour of not more than 27% opacity.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

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



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

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) (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 regulation.

6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

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.

**Compliance Certification**

**Summary of monitoring activities at HOLLINGSWORTH & VOSE GREENWICH MILL:**



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
U-BOILR/-/012	42	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
U-PAPER/-/0CC	50	work practice involving specific operations
U-PAPER/-/0CC	52	record keeping/maintenance procedures
U-PAPER/-/0CC	53	record keeping/maintenance procedures
U-PAPER/-/0CC	54	record keeping/maintenance procedures
FACILITY	38	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	28	intermittent emission testing
FACILITY	29	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	58	record keeping/maintenance procedures
FACILITY	31	work practice involving specific operations
FACILITY	32	intermittent emission testing
U-BOILR	41	monitoring of process or control device parameters as surrogate
U-PAPER/-/0CC	43	monitoring of process or control device parameters as surrogate
U-PAPER/-/0CC	44	record keeping/maintenance procedures
U-PAPER/-/0CC	46	work practice involving specific operations
U-PAPER/-/0CC	47	record keeping/maintenance procedures
U-PAPER/-/0CC	49	record keeping/maintenance procedures

**Basis for Monitoring**

Title V permits must contain sufficient monitoring, including periodic monitoring, to assure compliance with the applicable requirements in the permit. In order to provide reasonable assurance of compliance for the following applicable requirements, facility specific operating/monitoring conditions, including recordkeeping and reporting, were incorporated in this permit. The basis of this monitoring is described below:

**Applicable Federal Requirement:6 NYCRR 228-1.4 (d) (3)** Emission Unit: U-PAPER  
 Process: 0CC-VOC Record keeping and Reporting

The facility 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 table D-2. In order to assure continuous compliance, as applied VOC content are calculated when raw materials or formulations change. Since these changes occur infrequently, the frequency of this activity is reasonable. Purchase, usage and/or production records for coating materials must also be maintained for further verification.



New York State Department of Environmental Conservation  
**Permit Review Report**

Permit ID: 5-5334-00006/00035

Renewal Number: 3

03/28/2017

**Applicable Federal Requirement: 6 NYCRR 212-1.6 (a)** (Emission Unit: U-PAPER Process: 00C), **6 NYCRR 227-1.3 (a)** (Emission Unit: U-BOILER), **6 NYCRR 228-1.3 (a)** (Emission Unit: U-PAPER Process: 0CC) – Opacity

Opacity from emission points is limited to less than 20%, in addition to which boilers are allowed 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 a source. Compliance with these limits will be demonstrated through daily visible emission observations (VEOs) of the stacks, as these rules do not specify any monitoring frequency. However, the department also reserves the right to perform or require the performance of a Method 9 opacity evaluation.

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

Combustion sources are also subject to the visible emissions requirements as specified in 6 NYCRR 227-1.3(a). The boilers at this facility primarily burn natural gas and are expected to emit virtually no visible emissions under normal operating conditions. Other stationary combustion sources (e.g., emergency diesel generators, space heaters, etc.) are generally operated on a regular, but infrequent, basis or are very minor sources. Since visible emissions are not likely to occur during periods of natural gas combustion, or from the permit exempt combustion sources, daily VEOs are again sufficient to provide compliance assurance.

**Applicable Federal Requirement: 6 NYCRR 227.2 (b) (1)** (U-BOILER Process: 012) - Particulate Emissions Limit from Any Oil Fired Stationary Combustion Installation

6NYCRR Part 227.2 requires oil fired stationary combustion installations to comply with a 0.1 pounds per million Btu particulate matter emission limit. The facility's boilers use natural gas under typical operation, with No. 2 fuel oil as backup during periods of gas curtailment or maintenance in accordance with 40 CFR 63, Subpart JJJJJ (i.e., units designed to burn gas 1 subcategory). Since this PM requirement applies only to sources which combust fuel oil, it is reasonable to require monitoring upon request due to the limited use of No. 2 fuel. In addition, these sources are observed daily for visible emissions when combusting distillate fuel oil as well as natural gas. Any visible emissions would require the facility investigate the situation to ensure good combustion. Note, the Ames boiler can only fire natural gas and is not subject to this PM standard.



New York State Department of Environmental Conservation  
**Permit Review Report**

Permit ID: 5-5334-00006/00035  
Renewal Number: 3  
03/28/2017

**Applicable Federal Requirement: 6 NYCRR 212-1.5 (e) (2)** (Emission Unit: U-PAPER Process: OCC) - Formaldehyde

The facility operates an affected source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for Paper and Other Web Coating. The facility has elected to satisfy Part 212 requirements (applicable to A-rated contaminants from coating processes), for the respective air contaminant regulated under the NESHAP, by demonstrating that the coating processes is in compliance with the Federal regulation. In addition, the facility must provide an acceptable TIA demonstrating that the maximum offsite ambient air concentration is less than the AGC/SGC for High Toxicity Air Contaminants (HTACs) found in Section 212-2.2, Table 2.

Formaldehyde is a HTAC which is potentially emitted from coating operations and requires a TIA. Based on the results of this TIA the facility must limit Formaldehyde emissions to no greater than 0.8 pounds per hour and .67 tons per year, in order to maintain maximum offsite ambient air concentration to less than the AGC/SGC. Compliance with these limits are demonstrated through monitoring and recording formulations of coating/binders and production rates, which are used to calculate both the hourly and annual emission rates on a continuous and monthly basis, respectively. In addition, emission rates are verified through stack testing on an annual basis. Frequency of stack tests events may revert back to once-per-term of the facility's title V permit, after the facility demonstrates continuous compliance for three (3) consecutive years.

**Applicable Federal Requirement: 6 NYCRR 225-1.2 (h)** (Facility), **40CFR 60.48c (f) (1), NSPS Subpart Dc** (Emission Unit: U-BOILER Process: 012 Emission Source: HUBLR) – Fuel Oil Sulfur Content

The facility owns and operates a 16 mmBtu Ames boiler fired on natural gas and a 25 mmBtu Hurst boiler fired on natural gas with No. 2 fuel oil as backup. The 25 mmBtu Hurst boiler is subject to SO<sub>2</sub> emission standards in accordance with 40 CFR 60, New Source Performance Standards (NSPS), Subpart Dc. The facility has elected to demonstrate compliance with this standard based on the option to use fuel certifications indicating sulfur content of the fuel oil and prohibit the combustion of fuel oil with more than 5% sulfur content of by weight.

In addition, Subpart Dc requires the facility to maintain records of the fuel combusted monthly. On a semiannual basis, the owner or operator shall submit records of fuel supplier certifications and a signed statement that the records submitted represents all the fuel combusted during the reporting period.



New York State Department of Environmental Conservation  
**Permit Review Report**

**Permit ID: 5-5334-00006/00035**

**Renewal Number: 3**

**03/28/2017**

The Hurst boiler is also required to comply with a maximum allowable fuel sulfur content of .0015%, by weight, in accordance with 6 NYCRR Part 225-1. A comparison to this limit will be made on a per delivery basis in order to assure compliance with both rules. This monitoring frequency will prevent the facility from inadvertently combusting No. 2 fuel oil in excess of the sulfur limit. This limitation also makes the facility minor for Prevention of Significant Deterioration (PSD) applicability.

**Applicable Federal Requirement: 40CFR 63.3320(b)(3), Subpart JJJJ** (Emission Unit: U-PAPER Process: OCC)

This facility operates affected sources subject to 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for Paper and Other Web Coating. The facility has elected to comply with the Subpart JJJJ compliance option to control of organic HAPs to no more than 20 percent of the mass of coating solids, as applied. This subpart also specifies record keeping and reporting requirements.

**Applicable Federal Requirement: 40CFR 63, Subpart JJJJJJ** (Emission Unit: UBOILR)

The facility's major source status was re-designated as an area source in regards to the Area Source NESHAP, Subpart JJJJJJ. This was accomplished through process changes which lowered the facility's Potential to Emit (HAPs) below major source thresholds prior to the Major Source NESHAP, Subpart DDDDD, compliance date (January 31, 2016). As an area source, the facility's gas fired boilers (defined in §63.11237) are not subject to the Area Source Boilers NESHAP rule in accordance with 63.11195. The facility's boilers were converted to, and operated as, gas fired boilers since December 2012.