



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

**Permit ID: 6-2336-00028/00051**

**Renewal Number: 3**

**12/01/2017**

**Facility Identification Data**

Name: Neenah Northeast - Lowville

Address: 5492 BOSTWICK ST

LOWVILLE, NY 13367

**Owner/Firm**

Name: NEENAH NORTHEAST, LLC

Address: 3460 Preston Ridge Rd Ste 600

Alpharetta, GA 30005, USA

Owner Classification: Corporation/Partnership

**Permit Contacts**

Division of Environmental Permits:

Name: THOMAS G VOSS

Address: NYSDEC - REGION 6

317 WASHINGTON ST

WATERTOWN, NY 13601-3787

Phone:

Division of Air Resources:

Name: ROBERT A JACOBS

Address: NYSDEC - REGION 6

317 WASHINGTON ST

WATERTOWN, NY 13601

Phone:3157852513

Air Permitting Contact:

Name: JONATHAN ROSE

Address: NEENAH NORTHEAST LLC

5492 BOSTWICK ST

LOWVILLE, NY 13367

Phone:3153764861

**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.

**Attainment Status**



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Neenah Northeast - Lowville is located in the town of LOWVILLE in the county of LEWIS. 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.)

<b>Criteria Pollutant</b>	<b>Attainment Status</b>
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:**

The facility manufactures products for books & folders, utilizing RACT compliant coating machines and one print machine utilizing both solvent based and aqueous inks, which are applied to a paper, leather or textile substrate. Other sources at the facility include two boilers fueled with natural gas, coating mixing & handling areas, and solvent storage tanks.

**Permit Structure and Description of Operations**

The Title V permit for Neenah Northeast - Lowville 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 that is not included in the above categories.

Neenah Northeast - Lowville is defined by the following emission unit(s):

Emission unit 000002 - Facility Coaters - Aqueous Coater 2AQ (emission points 00033, 00034, 00035 and 00036); Aqueous Coater 8AQ (emission points 00037, 00038, 00039 and 00040); Aqueous Coater 11



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(emission point 00024).

Aqueous coaters are two and three station coaters, front and back, paper and other substrates, water Base Coaters and Dryers.

One station Aqueous Printer/Coater 4AQ (emission point 00041), front and/or back paper or other substrates and associated dryers.

This unit also includes emission point 00042, 00043, 00044, and 00045 which ventilate the 55-gallon drum staging areas located at each coater.

Emission unit 000002 is associated with the following emission points (EP):

00024, 00033, 00034, 00035, 00036, 00037, 00038, 00039, 00040, 00041, 00042, 00043, 00044, 00045

Process: 021 is located at Building MAIN - This process includes 1 operational coater at the plant. Inside coater 11; coating is applied to a paper or other substrate and then dried to create a rigid or semi-rigid binder for books and folders.

Process: 022 is located at Building MAIN - The first coating head applies an aqueous latex based acrylic coating to a paper substrate. The web then enters the first two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled and receives a topcoat. The web then enters the second two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled, and a water back up coat applied. The web then enters the second two zone dryer and is finally rewound.

Process: 024 is located at Building MAIN - The single station printer/coater will apply inks to paper and other substrates by utilizing various application methods such as Rotogravure, Knife and Stork (rotary silk screen) Printing. Once the print is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 026 is located at Building MAIN - The single station printer/coater will apply coatings to paper and other substrates. Once the coating is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 028 is located at Building MAIN - Process exhaust originating from 55 gallon drum staging area at emissions sources CR2AQ, CR8AQ, CTR11 and PR4AQ. Process 028 total throughput values are based on coater throughputs. (All emissions from these exhausts will be captured in the monthly coating usage)

Emission unit 000003 - Waterbased coating make-up room Schold's Mixer. Emission point 00016. Water-based coating make-up room. Emission point 00031 associated with room.

Emission unit 000003 is associated with the following emission points (EP):

00016, 00031

Process: 031 is located at Building MAIN - Designated areas in the plant are used for the blending and mixing of solvent based and water based coatings.

Emission unit 000005 - This emission unit includes Printer/Coater 3AQ, previously Coater #5, (emission #1 (emission point 00052), Printer #2, mixing and dispensing operations, (emission points 00054 & 00055) and wastewater treatment operations (emission points 00056 & 00057).



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Emission unit 000005 is associated with the following emission points (EP):  
00048, 00049, 00050, 00052, 00054, 00055, 00056

Process: 030 is located at Building MAIN - This process includes Printer/Coater 3AQ (previously Coater #5), the Tandem Coater, Printer #1 and Printer #2, print heads and associated floor sweeps that utilize multiple coating stations to apply coatings to paper or other substrates. Once the coatings are applied, the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Process: 032 is located at Building MAIN - Wash down water from aqueous coating and printing lines is treated by pH adjustment to precipitate metals, which are removed using two rotary vacuum drum filters prior to discharge.

Process: 033 is located at Building MAIN - This process includes the dispensing of coating and ink solutions into 55-gallon drums in the facility's color mix room. Raw materials and previously mixed formulations are added to the drums utilizing automatic and manual dispensing systems. Prior to dispensing, raw materials are combined and mixed into solution to match formulations. The raw materials are stored utilizing: larger storage tanks, tote bins, drums and pails. All of the equipment used prior to dispensing already exists or is exempt from permitting. After dispensing, the solutions are transported for use at the coating and printing equipment. One dispenser is also located in the printer area.

Process: 034 is located at Building MAIN - This process includes Printer/Coater 3AQ (previously Coater #5), Printer #1, Printer #2, print heads and associated floor sweeps that utilize multiple stations to apply inks to paper and other substrates by using knife and rotogravure printing. Once the print is applied the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Emission unit 000001 - Facility Boilers - North American Model 3350 - Emission Point 00001 and ORR & Sembower Inc. - Emission Point 00002.

Emission unit 000001 is associated with the following emission points (EP):  
00001, 00002

Process: 012 is located at Building MAIN - Boilers burning natural gas. Two boilers (BLR01 and BLR02) are located in the plant. Both boilers were retrofitted to burn natural gas in 12/97. Process 012 thruput values are based on published boiler capacities.

**Title V/Major Source Status**

Neenah Northeast - Lowville is subject to Title V requirements. This determination is based on the following information:

The facility is a Title V major for emissions of Total Hap (57.5 TPY), VOCs (95.3 TPY), Carbitol (47 TPY).

**Program Applicability**

The following chart summarizes the applicability of Neenah Northeast - Lowville with regards to the principal air pollution regulatory programs:

**Regulatory Program**

**Applicability**



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PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	NO
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.

**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.



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**RACT** Reasonably Available Control Technology (6 NYCRR Parts 212-3, 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**

2672	PAPER COATED AND LAMINATED, NEC
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.

**SCC Code**

**Description**

1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
3-01-020-17	10-100 MMBtu/Hr CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PRINTING INK MANUFACTURE
4-02-013-01	PREMIX/PREASSEMBLY: DRUMS SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing
4-02-013-04	SURFACE COATING OPERATIONS



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4-02-820-02	SURFACE COATING OPERATIONS - PAPER COATING Coating Storage SURFACE COATING OPERATIONS
4-05-005-01	SURFACE COATING OPERATIONS - WASTEWATER, AGGREGATE WASTEWATER: PROCESS EQUIPMENT DRAINS PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754

**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	1000			
000872-50-4	1-METHYL-2-PYRROLIDONE		16.1		
000107-98-2	2-PROPANOL, 1-METHOXY		4.5		
000079-10-7	2-PROPENOIC ACID		0.4		
000108-05-4	ACETIC ACID ETHENYL ESTER		1.2		
007664-41-7	AMMONIA		36.4		
000124-38-9	CARBON DIOXIDE				3314
0NY750-00-0	CARBON DIOXIDE		30166		
000630-08-0	EQUIVALENTS CARBON MONOXIDE		22		2.3
000111-90-0	ETHANOL, 2-(2-ETHOXYETHOXY)		47		3.3
000112-34-5	ETHANOL, 2-(2-BUTOXYETHOXY)		0.4		
000111-76-2	ETHANOL, 2-BUTOXY-		0.3		



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000050-00-0	FORMALDEHYDE	1306		
007439-92-1	LEAD	0.26		
000057-55-6	METHYLETHYL GLYCOL		0.7	
000121-44-8	N,N-DIETHYL ETHANAMINE		6	
064742-53-6	NAPHTHA (PETROLEUM) HYDROTREATED LIGHT		9	
008030-30-6	NAPHTHA		2	
0NY210-00-0	OXIDES OF NITROGEN		25.1	2.8
0NY075-00-0	PARTICULATES		1.9	0.2
0NY075-00-5	PM-10		1.9	0.2
025265-71-8	PROPANOL, OXYBIS		7.3	
000103-11-7	PROPENOIC ACID, 2- ETHYLHEXYL ESTER		0.9	
002530-83-8	SILANE, TRIMET HOXY[3- (OXIRANYLMETH OXY)PROPYL]-		39	
000100-42-5	STYRENE		0.1	
007446-09-5	SULFUR DIOXIDE	400		34
0NY100-00-0	TOTAL HAP		58	3.9
0NY998-00-0	VOC	190000		9.9

**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.





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- 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 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;



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- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

**Item J: Reopening for Cause - 6 NYCRR 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.

**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,



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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: 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



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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**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Regulation</b>	<b>Condition</b>	<b>Short Description</b>
FACILITY	ECL 19-0301	96	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63- DDDDD.7495 (b)	53	ICI Boiler Major Source NESHAP - Compliance Date for Existing Sources
FACILITY	40CFR 63- DDDDD.7495 (d)	54	ICI Boiler Major Source NESHAP - Notification Requirements
0-00001	40CFR 63- DDDDD.7500 (a) (	76	ICI Boiler Major Source NESHAP - Emission Limits and Management Practices
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FACILITY	40CFR 63- DDDDD.7530 (f)	55	ICI Boiler Major Source NESHAP - Notification of Compliance Status
0-00001	40CFR 63- DDDDD.7550 (c)	80	ICI Boiler Major Source NESHAP - Compliance Reports
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0-00003/-/031	40CFR 63-	90	Miscellaneous Organic



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FACILITY	40CFR 63-JJJJ.3330(a)	59	Compliance date for existing affected sources.
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FACILITY	40CFR 63-JJJJ.3400(e)	69	Paper and Other Web Coating NESHAP - Reporting - Notification of Compliance Status report
FACILITY	40CFR 63-JJJJ.3410(a)	70	Paper and Other Web Coating NESHAP - Record keeping requirements.
FACILITY	40CFR 63-KK.820(b)	39	Printing and Publishing NESHAP - exemption for research and laboratory equipment
FACILITY	40CFR 63-KK.821(a)(2)	40	Printing and Publishing NESHAP-designation of affected sources
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0-00002/-/024	40CFR 63-KK.823	87	Printing and Publishing NESHAP-standard: general
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FACILITY	40CFR 63-KK.825(b)	43	Printing and Publishing NESHAP-standard: product and packing rotogravure and wide-web flexographic printing
FACILITY	40CFR 63-KK.826(b)	44	Printing and Publishing NESHAP-compliance dates
FACILITY	40CFR 63-KK.827(b)(2)	45	Performance Test Methods - Printing & Publishing MACT
FACILITY	40CFR 63-KK.827(c)(3)	46	Printing and publishing NESHAP-performance test standards
FACILITY	40CFR 63-KK.829(a)	47	Printing and Publishing NESHAP-Recordkeeping
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FACILITY	40CFR 68	19	Chemical accident prevention provisions
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FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	10	Maintenance of equipment.
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FACILITY	6NYCRR 201-3.2(a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3(a)	14	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 71, 72	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)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4(e)	6	Compliance Certification
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FACILITY	6NYCRR 201-7	73	Federally Enforceable Emissions Caps
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FACILITY	6NYCRR 202-2.5	8	Emission Statements - Applicability
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FACILITY	6NYCRR 211.2	98	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 212-1.6(a)	24	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-2.3(b)	99	Limiting of Opacity State Air Program Non-Criteria air contaminants subject Table 4
FACILITY	6NYCRR 212-2.4(b)	25	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	9	Open Fires - Prohibitions
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0-00001	6NYCRR 227-1.3(a)	74	Smoke Emission Limitations.
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FACILITY	6NYCRR 228-1.1(a)(3)	26	Once in always in
FACILITY	6NYCRR 228-1.1(b)(9)	27	55 gallons- or 400 pounds VOC
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FACILITY	6NYCRR 228-1.3(a)	28	Surface Coating General Requirements- Opacity
FACILITY	6NYCRR 228-1.3(c)	29	Surface Coating General Requirements- Prohibitions
0-00005/-/030	6NYCRR 228-1.4(d)(3)	94	VOC limits for Paper Film & Foil coatings
FACILITY	6NYCRR 228-1.6(a)	30	Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6(c)	31	Surface coating access for sampling
FACILITY	6NYCRR 228-1.6(h)	32	Records reporting and maintaining
0-00002/-/024	6NYCRR 234.3(a)(1)(i)	84	Control requirements - Ink
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FACILITY	6NYCRR 234.3(f)	35	Control requirements - RACT demonstration
0-00002/-/024	6NYCRR 234.4(b)	86	Testing and monitoring - test methods
FACILITY	6NYCRR 234.6	36	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 234.7	37	Recordkeeping requirements
FACILITY	6NYCRR 234.8	38	Opacity

**Applicability Discussion:**

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





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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.

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



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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 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



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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**

In addition to Title V, Neenah Northeast - Lowville has been determined to be subject to the following regulations:

40 CFR 63.3300

40 CFR 63.3320 (b) (2)

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 4% of the mass of the coating materials as organic HAP for existing sources and



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1.6% 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 63.3320 (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 63.3330 (a)

This condition requires compliance by the compliance date and a performance test must be completed.

40 CFR 63.3330 (b)

A new effected source is required to show compliance upon start-up. A performance test must be completed within the time limits of 63.7(a)(2).

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.

40 CFR 63.3360 (d)

If the facility decides to choose the VOC content as a surrogate to show compliance with the HAP content, the as-purchased VOC content must be determined one of 3 ways. Method 24, Formulation Data, or as-applied content.

40 CFR 63.3370 (b)

Compliant coatings as-applied must be no more than 0.04 mass fraction organic HAP or 0.2 kg organic HAP per kilogram for existing sources. For new sources, the as-applied coatings must be no more than 0.016 mass fraction organic HAP or 0.08 kg organic HAP per KG coating solids on an as-purchased basis.

40 CFR 63.3370 (c)

If compliance is shown by meeting the "as applied" coating limits, there is a choice of four procedures for showing compliance.

40 CFR 63.3370 (c) (5)



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The HAP content limit can be met as-applied or on a monthly average basis.

40 CFR 63.3400 (b)

This condition requires that the facility submit an initial notification no later than one year before the facility needs to be in compliance with this subpart. The notification will include basic information about the facility and will be submitted to EPA Region 2 and the NYSDEC. A permit application may be submitted instead of an initial notification in certain cases.

40 CFR 63.3400 (c) (1)

This condition requires that the facility submit semi-annual compliance reports in order to let NYSDEC know whether the facility has been meeting the emission limits contained in this subpart. This condition spells out the dates that the reports are to be submitted by.

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 63.3400 (e)

A notice of compliance status is required to be submitted .

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 63.7495 (b)

This regulation requires industrial, commercial or institutional boilers located at facilities that are major sources of hazardous air pollutants to comply with 40 CFR 63 Subpart DDDDD by January 31, 2016.

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) (3)



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

40 CFR 63.7530 (d)

This section requires that the facility owner or operator submit a signed notice of compliance status that an initial tune-up of the unit was completed.

40 CFR 63.7530 (e)

An energy assesment is required with the submission of the Notification of Compliance status.

40 CFR 63.7530 (f)

This condition states the owner or operator must submit the notification of compliance status in the initial compliance demonstration.

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR 63.7550 (d)

This condition states the requirements for reporting deviations at facilities not using a continuous monitoring system

40 CFR 63.7555 (a)

This condition states what records must be kept

40 CFR 63.7560

This condition states in what form the records must be kept

40 CFR 63.8000 (a)

The limits apply at all times, except during start-up, shut down or Malfunction.

40 CFR 63.8000 (b)



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If you use a combustion control device, you must determine if there are halogens in the waste stream.

40 CFR 63.8005 (a)

This condition requires that each applicable work practice and emission limit the facility is subject to must be complied with.

40 CFR 63.8055

This condition outlines how to comply with a weight percent HAP limit in coatings.

40 CFR 63.8095

This condition states which parts of the general provisions apply.

40 CFR 63.820 (b)

This condition states this subpart does not apply to research or lab equipment.

40 CFR 63.821 (a) (2)

This condition states which types of equipment are subject to this subpart.

40 CFR 63.821 (a) (3)

This condition states which stand-alone equipment may be included as an affected source.

40 CFR 63.821 (c)

Any affected source may not be eligible to use the provisions of paragraph (b) of this section if it does not meet the requirements of paragraphs (b)(1) or (b)(2) of this section.

40 CFR 63.823

Table 1 of Subpart KK - National Emission Standards for the Printing and Publishing Industry, provides cross references to the General Provisions of 40 CFR 63Subpart A.

40 CFR 63.825 (b)

This condition outlines which limits the facility can comply with under this subpart for the affected sources. .

40 CFR 63.826 (b)

This paragraph specifies the compliance date for a facility with a new affected source subject to the provisions of 40 CFR 63, Subpart KK.



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40 CFR 63.827 (b) (2)

This condition outlines how to determine the HAP content of the inks, coatings, varnish, adhesive, solvent or other material.

40 CFR 63.827 (c) (3)

This condition says the facility can determine the weight fraction of vocs in the coatings, inks, etc, by using the formulation data.

40 CFR 63.829 (a)

This condition explains which recordkeeping provisions apply to the affected sources.

40 CFR 63.829 (b) (1)

This condition outlines what required compliance data must be maintained monthly.

40 CFR 63.830 (a)

This condition outlines which reporting requirements apply.

40 CFR 63.830 (b) (1)

This regulation requires that each owner or operator of an affected source subject to this subpart shall submit the reports specified below to the Administrator:

An initial notification required in § 63.9(b).

(i) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in § 63.826(a).

(ii) Initial notifications for new and reconstructed sources shall be submitted as required by § 63.9(b).

(iii) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under § 63.9(b), provided the same information is contained in the permit application as required by § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(iv) Permit applications shall be submitted by the same due dates as those specified for the initial notification.

40 CFR 63.830 (b) (3)

This paragraph states the requirements for a Notification of Compliance Status.





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40 CFR 63.830 (b) (6)

This paragraph states the requirements for a semiannual compliance summary report.

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 212-1.6 (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 212-2.3 (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 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 217-3.3

This condition outlines the exemptions from the diesel idling provisions of this part.

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.



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6 NYCRR 227-1.6

This condition states compliance issues must be corrected at a combustion installation or it may not be allowed to operate.

6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.1 (b) (9)

This condition allows the use of up to 55 gallons (or 400 lbs of VOC) per year of coatings that are not subject to the requirements of Part 228.

6 NYCRR 228-1.10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

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 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

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



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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.

6 NYCRR 234.3 (a) (1) (i)

For packaging rotogravure, publication rotogravure or flexographic printing processes that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

6 NYCRR 234.3 (e) (1) (i) ('a')

This regulation requires that for screen printing processes that uses ink, coating or adhesive containing VOC can use, as a strategy to control VOC a maximum permitted amount of 3.3 pounds of VOC per gallon of ink, coating or adhesives.

6 NYCRR 234.3 (f)

This regulation sets forth the requirements for a RACT demonstration for printing processes that have a lesser degree of control than that specified in Part 234.3.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject of the requirements of Part 234.



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6 NYCRR 234.6

This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7

This regulation sets forth the record keeping requirements for facilities subject of the requirements of Part 234.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

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 72000 lbs of VOC annually from emission unit 00005.

**Compliance Certification**

**Summary of monitoring activities at Neenah Northeast - Lowville:**

<b>Location Facility/EU/EP/Process/ES</b>	<b>Cond No.</b>	<b>Type of Monitoring</b>
FACILITY 0-00001	53	record keeping/maintenance procedures
	76	record keeping/maintenance procedures



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0-00001	78	record keeping/maintenance procedures
0-00001	79	record keeping/maintenance procedures
0-00001	80	record keeping/maintenance procedures
0-00001	81	record keeping/maintenance procedures
0-00001	82	record keeping/maintenance procedures
0-00001	83	record keeping/maintenance procedures
0-00003/-/031	90	record keeping/maintenance procedures
0-00003/-/031	91	monitoring of process or control device parameters as surrogate
FACILITY	57	work practice involving specific operations
FACILITY	58	work practice involving specific operations
FACILITY	61	record keeping/maintenance procedures
FACILITY	62	record keeping/maintenance procedures
FACILITY	63	work practice involving specific operations
FACILITY	64	record keeping/maintenance procedures
FACILITY	65	work practice involving specific operations
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	43	record keeping/maintenance procedures
FACILITY	45	work practice involving specific operations
FACILITY	46	record keeping/maintenance procedures
FACILITY	48	record keeping/maintenance procedures
FACILITY	50	record keeping/maintenance procedures
FACILITY	51	record keeping/maintenance procedures
FACILITY	52	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
0-00005	93	monitoring of process or control device parameters as surrogate
FACILITY	7	record keeping/maintenance procedures
FACILITY	24	monitoring of process or control device parameters as surrogate
FACILITY	99	monitoring of process or control device parameters as surrogate
FACILITY	25	intermittent emission testing
0-00001	74	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	33	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
0-00005/-/030	94	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
0-00002/-/024	84	work practice involving specific operations
0-00002/-/024	85	work practice involving specific operations
FACILITY	35	record keeping/maintenance procedures
0-00002/-/024	86	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	record keeping/maintenance procedures
FACILITY	38	monitoring of process or control device parameters as surrogate

**Basis for Monitoring**

1) 6 NYCRR Part 201-6.5(c)(3)(ii): This facility is a major source as defined in 6 NYCRR Part 201-2.



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Any facility that receives a Title V permit is required to make a semi-annual monitoring report.

2) 6 NYCRR Part 201-6.4(e): This facility is a major source as defined in 6 NYCRR Part 201-2. Any facility that receives a Title V permit is required to submit an annual compliance certification.

3) 6 NYCRR Part 201-7: This facility has a volatile organic compound (VOC) potential to emit (PTE) > 50 tons per year (tpy) making it a major source as defined in 6 NYCRR Part 231-2.1. Emission unit 0-00005 was installed in March 2003 but the facility accepted a VOC emission cap, for the emission unit, to less than 40 tpy in order to avoid the new source review (NSR) requirements of 6 NYCRR Part 231-2.

In 1982 the facility installed a boiler capable of firing #6 fuel oil. The facility has accepted a limit on the heat input of BLR01, a sulfur content of 1.0% for #6 fuel oil burned in BLR01, and is also restricted from firing #6 fuel oil in BLR02. These limits were taken in order to continue to avoid becoming a major source of sulfur dioxide under Federal Prevention of Significant Deterioration Regulations (40 CFR 52.21). The facility has since removed the ability to fire oil and is not subject to sulfur limits within the permit.

This facility emits formaldehyde which has been given an A rating in accordance with the provisions of 6 NYCRR Part 212. All sources regulated under 6 NYCRR Part 212 must operate in a manner as not to exceed the ambient guideline concentrations contained in NYSDEC Program Policy DAR-1 - Guidelines for the Control of Toxic Ambient Air Contaminants. The facility has accepted an annual emission limit of formaldehyde at 1306 pounds as part of a T-BACT analysis submitted for this renewal. This emission level ensures that the facility will not exceed unacceptable impacts in the area.

4) 6 NYCRR Part 202-2.1: Any facility issued a Title V permit must submit an annual emission statement by April 15th every year.

5) 6 NYCRR Part 212-2.4(b)(1) & 212-1.6: Emission sources not covered or exempted from any other rule are considered process sources per 6 NYCRR Part 212. For this facility these include processes 028 of emission unit 0-00002, process 031 of emission unit 0-00003, and processes 033 & 034 of emission unit 0-00005. All process sources regulated under 6 NYCRR Part 212 must operate in a manner as not to exceed the particulate emission rate and opacity limits contained in that rule.

6) 6 NYCRR Part 227-1.3(a): Emission unit 0-00001, emission sources BLR01 & BLR02 meet the definition of stationary combustion installation in 6 NYCRR Part 227-1. All sources required to comply with that rule must meet the opacity limit contained in the rule.

7) 6 NYCRR Part 228-1.1(a)(3), (b)(9); 228-1.3(a); 228-1.6(a), (c) and (h); 228-1.10, 228-1.4: This facility has a VOC PTE > 10 tpy and coats paper at emission unit 0-00002, processes 021 & 026 and emission unit 0-00005, process 030. The facility also prepares and handles surface coatings at various processes in emission units 0-00002, 0-00003 & 0-00005. Therefore, the VOC RACT requirements and all other emission limits, monitoring, recordkeeping and reporting requirements of 6 NYCRR Part 228 apply to these emission units' paper coating operations.

8) 6 NYCRR Part 228-1.3(c): This facility can consider certain surface coatings as low-use coatings as long as the combined facility-wide usage is 55 gallons or less during any 12 month period. The facility must maintain records to demonstrate compliance with this option.

9) 6 NYCRR Part 234: This facility has a VOC PTE > 50 tpy and applies ink to substrates at emission unit 0-00002, process 024 and emission unit 0-00005, process 034. Therefore, the VOC RACT



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requirements and all other limits, monitoring, record keeping and reporting requirements of 6 NYCRR Part 234 apply to these emission units' printing operations.

10) 40 CFR 63.825(b); 63.827(b)(2) & (c)(3); 63.829(b)(1) and 63.830(b)(1), (b)(3) & (b)(6): This facility is a major source of HAP that includes affected sources (emission unit 0-00002, process 024 & emission unit 0-00005, process 034) as defined by 40 CFR Part 63, Subpart KK. Therefore, these processes must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule that apply to sources using compliant inks as their compliance option.

11) 40 CFR Part 63.3320(b)(2) & (b)(3); 63.3360(c) & (d); 63.3370(b), (c), (c)(5), (d) & (l); 63.3400(b), (c)(1), (c)(2) & (e) and 63.3410(a): This facility is a major source of hazardous air pollutants (HAP) that includes affected sources (emission unit 0-00002, processes 021, 022 & 026 and emission unit 0-00005, process 030) as defined by 40 CFR Part 63, Subpart JJJJ. Therefore, these processes must comply with the HAP control, monitoring, record keeping and reporting requirements of the rule that apply to sources using compliant coatings as their compliance option. Emission unit 0-00002, process 026 and emission unit 0-00005, process 030 must already be in compliance. The compliance deadline for emission unit 0-00002, processes 021 & 022 is December 5, 2005.

12) 40 CFR 63.8000(a), 8005(a), 8055, 8095: This facility will continue to manufacture coatings for its own facilities located in other parts of the country. Therefore, it is subject to the requirements of these regulation citations, and it has elected to comply with the alternative limit.

13) 40 CFR 63 Subpart DDDDD: The facility is a major source of HAPs and is subject to the major source boiler MACT. The boilers only fire natural gas, so there are no oil emission limits in the permit.