



Department of
Environmental
Conservation

SOURCE-SPECIFIC STATE IMPLEMENTATION PLAN REVISION

REASONABLY AVAILABLE CONTROL TECHNOLOGY

FINCH PAPER, LLC

Permit ID: 5-5205-00005/00059

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DIVISION OF AIR RESOURCES
Bureau of Air Quality Planning

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Acronyms and Abbreviations

CAA	Federal Clean Air Act
DAR	DEC Division of Air Resources
DEC	New York State Department of Environmental Conservation
EPA	United States Environmental Protection Agency
NAAQS	National Ambient Air Quality Standards
NYCRR	New York Codes, Rules, and Regulations
NO _x	Oxides of Nitrogen
NYCRR	New York Codes, Rules, and Regulations
PEMS	Predictive Emissions Monitoring System
RACT	Reasonably Available Control Technology
SIP	State Implementation Plan
SSSR	Source Specific SIP Revision
VOCs	Volatile Organic Compounds

Introduction

The United States Environmental Protection Agency (EPA) defines Reasonably Available Control Technology (RACT) as the lowest emission limitation that a particular source is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility.

Title 6 of the New York Codes, Rules, and Regulations (NYCRR) contains several regulations that define Reasonably Available Control Technology (RACT) for certain categories of stationary sources in New York. These regulations seek emissions reductions of nitrogen oxides (NO_x) and/or volatile organic compounds (VOCs) to help attain and/or maintain the 8-hour ozone National Ambient Air Quality Standards (NAAQS).

Depending upon the relevant RACT regulation, a source that is required to implement RACT must meet a presumptive RACT limit, meet an alternate limit determined from an approved technical analysis if reaching a presumptive RACT limit is technically or economically infeasible, or meet an approved case-by-case RACT limit for sources which do not have a presumptive RACT limit established in regulation. Individual source specific RACT determinations that are included in a facility's operating permit must be submitted to EPA as a revision to the New York State Implementation Plan (SIP) in order to satisfy the NO_x and/or VOC RACT requirements under sections 182 and 184 of the Clean Air Act (CAA).

The New York State Department of Environmental Conservation's (DEC's) DAR-20 guidance, titled "Economic and Technical Analysis for Reasonably Available Control Technology (RACT)," provides procedures for the economic and technical feasibility analysis that needs to be used to evaluate source-specific RACT determinations and to determine appropriate RACT emission limits. This analysis must also be completed at each renewal of the emission source owner's permit. The re-evaluation must contain the latest control technologies and strategies available for review and allow for an inflation-adjusted economic threshold.

Source-specific RACT Determination and RACT Analysis

The Air Title V Facility Permit for Finch Paper LLC issued on December 20, 2021, and modified on January 12, 2022¹, contains a permit condition (Permit Condition 1-1) that establishes a NO_x emission limit that varies from the presumptive RACT limit for large boilers, which is 0.015 pounds per million British thermal units pursuant to 6 NYCRR 227-2.4 . Compliance will be determined using a predictive emissions monitoring system (PEMS) where NO_x emissions will be calculated daily based on boiler steam rates and emission rate curves developed for each boiler.

The permit also contains permit conditions that establish RACT for a wood waste boiler (Permit Condition 47) and recovery boilers (Permit Condition 60) for which there are no presumptive RACT limits.

The permit conditions also allow the facility to determine compliance with the alternate NO_x emission limits with averaging methods (30-day, 24-hour block) that differ from those imposed by 6 NYCRR 227-2.6 (1-hr).

The technical analyses used by DEC to determine the case-by-case RACT limits is included in this Source Specific SIP Revision (SSSR) as Appendix A.

¹ See “Air Title V Facility Permit and Permit Review Report”

Additional Considerations

DEC also used the following information in making its RACT variance determination and to demonstrate that the approved monitoring scheme, as included in the permit issued on December 20, 2017, reduces NO_x emissions:

- Boiler load and NO_x calculation sheet for March 2019.
- September 27, 2017, Inspection Detail for Finch Paper, LLC.
- Deviation detail for Certification Form Data.

These documents are included in this SSSR as Appendix B.

Air Title V Facility Permit and Permit Review Report

The Air Title V Facility Permit issued on December 20, 2021, for this facility that includes the RACT variance permit conditions is available at https://www.dec.ny.gov/dardata/boss/afs/permits/552050000500059_r4_1.pdf .

The Permit Review Report for this facility is available at https://www.dec.ny.gov/dardata/boss/afs/permits/prr_552050000500059_r4_1.pdf .

