

## **Appendix B: Additional Considerations**

	Deviation Num	Begin Date	End Date	Written Notif Date
ceedance	1	08/13/2017	09/13/2017	10/30/2017
ceedance	1	07/14/2017	08/12/2017	10/30/2017
ceedance	1	06/13/2017	07/13/2017	10/30/2017

- OK
- Close
- Print
- Help

Contact

**Deviation detail for Certification Form Data**

Deviation Type Code: **1-Emissions Exceedar** Deviation Num: **1**

(mm/dd/yyyy) (mm/dd/yyyy) (mm/dd/yyyy)

Deviation Begin Date: **08/13/2017** Deviation End Date: **09/13/2017** Written Notif Date: **10/30/2017**

**Deviation description:**

During a validation meeting on August 28th it was discovered that the formula used to determine compliance was incorrect. The error caused the NOx lbs. to be bias low. The 30 day average from August 13th, 2017 through September 13th, 2017 was 0.230 which exceeded the limit of 0.225 lbs/MBTU. Expand

**Cause of deviation:**

Incorrect calculation was set up but was discovered on 8/28/17. Expand

**Corrective action to resolve deviation:**

The calculation error was corrected and the boiler operation was adjusted and the subsequent NOx 30 day block averages have all been less than 0.225 lb/MMBTU. Expand

Close

OK

Close

Help

11/02/20
11/05/20
11/03/200

Time Stamp	Oxygen	CO (ppm)	NOx (ppm)	NOx (lb/mmbtu) As sampled	NOx (lb/mmbtu) Calculated	BFT-281-302.PV	BFT-381-303.PV	BFT-481-304.PV	BFT-581-305.PV	BFT-6003-308.PV	BFT-6003-309.PV	BFT-1220-310.PV
4/1/19 8:16	11.49	4.4	89.7	0.207	0.190	31	28	16	23	102	130	106
3/31/19 10:49	11.16	6.8	70.2	0.157	0.193	31	31	14	22	111	129	104
3/30/19 9:20	11.23	9	76.9	0.173	0.190	32	32	23	25	106	143	97
3/29/19 14:12	10.93	19	96.5	0.210	0.208	39	39	31	31	112	143	90
3/28/19 9:45	11.61	4.6	92.7	0.217	0.200	31	28	33	33	109	144	104
3/27/19 8:15	11.28	6.4	106.5	0.241	0.209	41	41	30	30	113	142	109
3/26/19 8:08	11.15	31.5	128.2	0.286	0.237	31	23	50	50	98	142	107
3/25/19 9:36	11.50	5.5	109.9	0.254	0.231	51	50	36	37	115	141	86
3/24/19 10:12	10.54	17.8	115.6	0.243	0.222	44	44	36	36	112	143	94
3/23/19 10:48	12.60	17.4	90.5	0.237	0.203	31	30	34	34	108	142	101
3/22/19 10:11	10.50	48.1	104.8	0.219	0.259	47	46	17	53	109	137	107
3/21/19 8:15	13.85	5.6	55.3	0.170	0.198	31	23	17	31	107	129	107
3/20/19 10:06	12.02	6.9	94.7	0.232	0.220	48	47	30	31	112	141	85
3/19/19 8:42	12.10	12.4	88.2	0.218	0.227	49	50	18	22	110	141	107
3/18/19 7:19	12.45	5.6	97	0.249	0.243	37	37	64	42	105	144	114
3/17/19 8:31	12.53	3.9	95.7	0.248	0.312	87	87	14	42	97	131	114
3/16/19 9:00	13.44	1.4	82.1	0.239	0.289	31	23	98	42	84	140	113
3/15/19 8:31	12.23	28	81.5	0.204	0.203	37	37	18	23	99	140	124
3/14/19 7:21	13.67	1.9	67.9	0.204	0.245	31	0	49	51	111	143	125
3/13/19 7:15	12.12	2.9	117.8	0.292	0.260	38	0	56	55	111	145	126
3/12/19 6:59	11.20	5	130.1	0.291	0.287	63	63	63	63	112	143	4
3/11/19 9:11	12.87	1.8	80.6	0.218	0.191	31	23	29	29	104	141	112
3/10/19 8:44	11.89	2.3	99.1	0.239	0.270	53	52	59	59	73	116	97
3/9/19 10:37	11.76	1.7	114.3	0.272	0.270	86	0	40	39	95	138	111
3/8/19 9:27	12.49	1.4	106.3	0.275	0.261	53	0	54	54	124	140	125
3/7/19 8:56	13.18	4.8	72.6	0.204	0.213	58	0	25	25	119	140	118
3/6/19 9:34	12.97	1.3	95.8	0.263	0.290	32	0	66	66	107	138	114
3/5/19 8:27	11.76	4.9	124.2	0.295	0.275	54	0	59	60	112	145	114
3/4/19 9:42	12.90	2	86.1	0.234	0.300	62	0	68	68	114	117	114
3/3/19 8:13	13.13	1.2	90.3	0.253	0.230	30	0	44	45	101	113	114
3/2/19 9:26	14.55	8.1	47.1	0.161	0.181	30	0	14	23	111	114	112
3/1/19 10:01	12.45	2.4	87.1	0.224	0.218	52	23	36	36	0	141	113



**Compliance Contact** SANDRA L LEBARRON  
 FINCH PAPER LLC1 GLEN ST  
 GLENS FALLS, NY 12801

<b>Inspector(s)</b>	<b>Primary</b>	<b>Reason(s)</b>
MICHAEL R SUNDBERG	<input checked="" type="checkbox"/>	Routine Inspection

**Comment**  
 Started the annual inspection on June 21st while waiting for the PM and mercury stack test. The wastewater plant was operating normally with no significant odors. There was approximately 0 opacity from the boilers. Sulfur burner, bleach plant and pulp mill control parameters were in compliance. On August 5, 2016, I returned to review records with Janna Fredericks. The records are now stored electronically, including the leak inspection reports which are hand written and then scanned into the system. They have a daily report which tracks the permit requirements. This now includes the boiler MACT requirements. Much of the time was spent reviewing how they track compliance with Power Boiler NOx RACT. They had an error in the NOx calculation formula but now have corrected it and their system, while labor intensive, is in conformance with the RACT Plan. They would like to get a NOx monitor.

**COMPLIANCE DETERMINATIONS:**

<b>Facility Level</b> <input type="checkbox"/>	<b>EU</b> 3-20000	<b>EP</b> 00012	<b>Process</b>	<b>ES</b>	<b>Program</b> STATE	<b>User ID</b> mrsundbe
<b>Permit ID</b>	5-5205-00005/00059 <b>Ren</b> 3	<b>Regulation</b>	6NYCRR 211.1		<b>Compliance Status</b> In Compliance	<b>HPV/Reason</b> <input type="checkbox"/>
<b>Condition #</b>	71	<b>Short Desc</b>	General Prohibitions - air pollution prohibited		<b>Period</b>	09/22/2017 10:00 AM
<b>CAS code</b>	<b>Contaminant</b>					

<b>Facility Level</b> <input type="checkbox"/>	<b>EU</b> 4-00000	<b>EP</b>	<b>Process</b> 401	<b>ES</b> 00402	<b>Program</b> STATE	<b>User ID</b> mrsundbe
<b>Permit ID</b>	5-5205-00005/00059 <b>Ren</b> 3	<b>Regulation</b>	6NYCRR 211.1		<b>Compliance Status</b> In Compliance	<b>HPV/Reason</b> <input type="checkbox"/>
<b>Condition #</b>	73	<b>Short Desc</b>	General Prohibitions - air pollution prohibited		<b>Period</b>	09/22/2017 10:00 AM
<b>CAS code</b>	<b>Contaminant</b>					

<b>Facility Level</b> <input type="checkbox"/>	<b>EU</b> 3-20000	<b>EP</b> 00012	<b>Process</b>	<b>ES</b>	<b>Program</b> SIP	<b>User ID</b> mrsundbe
<b>Permit ID</b>	5-5205-00005/00059 <b>Ren</b> 3	<b>Regulation</b>	6NYCRR 212-3.1(c)(3)		<b>Compliance Status</b> In Compliance	<b>HPV/Reason</b> <input type="checkbox"/>
<b>Condition #</b>	54	<b>Short Desc</b>	RACT compliance plans for NOx emission points		<b>Period</b>	09/22/2017 10:00 AM
<b>CAS code</b>	<b>Contaminant</b>					