

Facility DEC ID: 2640300107

**PERMIT**  
**Under the Environmental Conservation Law (ECL)**

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 2-6403-00107/00017  
Mod 0 Effective Date: 12/18/2017 Expiration Date: 12/17/2027  
Mod 1 Effective Date: 11/06/2018 Expiration Date: 12/17/2027  
Mod 2 Effective Date: 02/07/2023 Expiration Date: 12/17/2027

Permit Issued To: PRATT PAPER (NY) INC  
4435 VICTORY BLVD  
STATEN ISLAND, NY 10314

Contact: MUNEER AHMAD  
PRATT PAPER (NY), INC.  
4435 VICTORY BLVD  
STATEN ISLAND, NY 10314  
(718) 370-1114

Facility: PRATT PAPER (NY), INC  
4435 VICTORY BLVD  
STATEN ISLAND, NY 10314

Contact: TIMOTHY R. TARANTINO  
PRATT PAPER (NY), INC  
4435 VICTORY BLVD  
STATEN ISLAND, NY 10314  
(718) 354-8535

Description:

Pratt Paper (NY), Inc. is a state-of-the-art waste paper recycling facility. The facility consists of an existing paper machine that processes pulp into sheets of paper and includes the application of various dyes, one existing 249 MMbtu/hr. boiler firing natural gas, and three existing 14 MMbtu/hr. natural gas fired space heaters and a proposed wastewater treatment facility.

The facility is limiting its NO<sub>x</sub> and HAP emissions to less than the major threshold and is capping out of the applicable requirements, 6NYCRR Subpart 201-6, 6NYCRR Subpart 227-2 for NO<sub>x</sub> and NESHAPS for HAPS and is required to have a State Facility Permit under 6NYCRR Subpart 201-5. In addition, the facility is subject to 6NYCRR Part 212 for non-criteria contaminants.

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By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified and any Special Conditions included as part of this permit.

Permit Administrator:       STEPHEN A WATTS  
                                    47-40 21ST ST  
                                    LONG ISLAND CITY, NY 11101-5401

Authorized Signature: \_\_\_\_\_ Date: \_\_\_ / \_\_\_ / \_\_\_\_\_

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### Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

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**DEC GENERAL CONDITIONS**

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- 5 3 Applications for permit renewals, modifications and transfers
- 6 4 Permit modifications, suspensions or revocations by the Department

**Facility Level**

- 6 5 Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS

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**DEC GENERAL CONDITIONS**  
**\*\*\*\* General Provisions \*\*\*\***  
**GENERAL CONDITIONS - Apply to ALL Authorized Permits.**

**Condition 1: Facility Inspection by the Department**  
**Applicable State Requirement: ECL 19-0305**

**Item 1.1:**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

**Item 1.2:**

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

**Item 1.3:**

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**Condition 2: Relationship of this Permit to Other Department Orders and Determinations**  
**Applicable State Requirement: ECL 3-0301 (2) (m)**

**Item 2.1:**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**Condition 3: Applications for permit renewals, modifications and transfers**  
**Applicable State Requirement: 6 NYCRR 621.11**

**Item 3.1:**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

**Item 3.2:**

The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

**Item 3.3**

Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

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**Condition 4: Permit modifications, suspensions or revocations by the Department**  
**Applicable State Requirement: 6 NYCRR 621.13**

**Item 4.1:**

The Department reserves the right to exercise all available authority to modify, suspend, or revoke this permit in accordance with 6NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**\*\*\*\* Facility Level \*\*\*\***

**Condition 5: Submission of application for permit modification or renewal - REGION 2 HEADQUARTERS**  
**Applicable State Requirement: 6 NYCRR 621.6 (a)**

**Item 5.1:**

Submission of applications for permit modification or renewal are to be submitted to:  
NYSDEC Regional Permit Administrator  
Region 2 Headquarters  
Division of Environmental Permits  
1 Hunters Point Plaza, 4740 21st Street  
Long Island City, NY 11101-5407  
(718) 482-4997

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**Permit Under the Environmental Conservation Law (ECL)**

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

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4435 VICTORY BLVD  
STATEN ISLAND, NY 10314

Facility: PRATT PAPER (NY), INC  
4435 VICTORY BLVD  
STATEN ISLAND, NY 10314

Authorized Activity By Standard Industrial Classification Code:  
2631 - PAPERBOARD MILLS  
2653 - CORRUGATED AND SOLID FIBER BOX  
5093 - SCRAP AND WASTE MATERIALS

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Permit Expiration Date: 12/17/2027

Mod 1 Permit Effective Date: 11/06/2018

Permit Expiration Date: 12/17/2027

Mod 2 Permit Effective Date: 02/07/2023

Permit Expiration Date: 12/17/2027

**PAGE LOCATION OF CONDITIONS**

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**FEDERALLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 7 \*2 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 8 \*3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 10 \*4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 11 \*5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 12 22 6 NYCRR 211.2: Visible Emissions Limited
- 13 7 6 NYCRR 227-1.3 (a): Compliance Demonstration

**Emission Unit Level**

- 14 2-1 6 NYCRR Subpart 201-7: Process Permissible Emissions

**EU=U-00003,Proc=NG2,ES=B0004**

- 14 8 40CFR 60.44b(k), NSPS Subpart Db: Oxides of nitrogen standard exemption.

**EU=U-00004**

- 15 9 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 15 1-5 6 NYCRR 212-2.3 (b): Compliance Demonstration

**EU=U-OOCOR**

- 17 14 6 NYCRR 234.3 (a) (1) (i): Compliance Demonstration
- 17 15 6 NYCRR 234.6: Compliance Demonstration
- 18 16 6 NYCRR 234.7: Compliance Demonstration

**EU=U-WWTP1**

- 19 2-2 6 NYCRR 212-2.3 (a): Compliance Demonstration
- 20 2-3 6 NYCRR 212-2.3 (b): Compliance Demonstration

**STATE ONLY ENFORCEABLE CONDITIONS**

**Facility Level**

- 22 17 ECL 19-0301: Contaminant List
- 23 18 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 23 2-4 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 24 19 6 NYCRR Subpart 201-5: Emission Unit Definition
- 27 20 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 28 2-5 6 NYCRR 201-5.3 (c): CLCPA Applicability
- 28 21 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 28 6 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

- 29 23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 31 24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

**EU=U-00004**

- 35 25 6 NYCRR 212-2.1 (a): Compliance Demonstration

**EU=U-WWTP1**

- 35 2-6 6 NYCRR 212-1.1 (a) (1): Applicability - Issuance of new or modified permit or Registration



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NOTE: \* preceding the condition number indicates capping.

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**FEDERALLY ENFORCEABLE CONDITIONS**

Mod 2/FINAL

\*\*\*\* Facility Level \*\*\*\*

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Sealing - 6 NYCRR 200.5**

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

No person shall operate any air contamination source sealed by the Commissioner in accordance with this section unless a modification has been made which enables such source to comply with all requirements applicable to such modification.

Unless authorized by the Commissioner, no person shall remove or alter any seal affixed to any contamination source in accordance with this section.

**Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6**

Notwithstanding the provisions of 6 NYCRR Chapter III, Subchapter A, no person shall allow or permit any air contamination source to emit air contaminants in quantities which alone or in combination with emissions from other air contamination sources would contravene any applicable ambient air quality standard and/or cause air pollution. In such cases where contravention occurs or may occur, the Commissioner shall specify the degree and/or method of emission control required.

**Item C: Maintenance of Equipment - 6 NYCRR 200.7**

Any person who owns or operates an air contamination source which is equipped with an emission control device shall operate such device and keep it in a satisfactory state of maintenance and repair in accordance with ordinary and necessary practices, standards and procedures, inclusive of manufacturer's specifications,

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required to operate such device effectively.

**Item D: Unpermitted Emission Sources - 6 NYCRR 201-1.2**

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

**Item E: Recycling and Salvage - 6 NYCRR 201-1.7**

Where practical, any person who owns or operates an air contamination source shall recycle or salvage air contaminants collected in an air cleaning device according to the requirements of 6 NYCRR.

**Item F: Prohibition of Reintroduction of Collected Contaminants to the Air - 6 NYCRR 201-1.8**

No person shall unnecessarily remove, handle, or cause to be handled, collected air contaminants from an air cleaning device for recycling, salvage or disposal in a manner that would reintroduce them to the outdoor atmosphere.

**Item G: Proof of Eligibility for Sources Defined as Exempt Activities - 6 NYCRR 201-3.2 (a)**

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

**Item H: Proof of Eligibility for Sources Defined as Trivial**

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**Activities - 6 NYCRR 201-3.3 (a)**

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source 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 which contains emission sources or units subject to 6 NYCRR Subpart 201-3, 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.

**Item I: Required Emission Tests - 6 NYCRR 202-1.1**

An acceptable report of measured emissions shall be submitted, as may be required by the Commissioner, to ascertain compliance or noncompliance with any air pollution code, rule, or regulation. Failure to submit a report acceptable to the Commissioner within the time stated shall be sufficient reason for the Commissioner to suspend or deny an operating permit. Notification and acceptable procedures are specified in 6 NYCRR Subpart 202-1.

**Item J: Open Fires Prohibitions - 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.

**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)**

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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.

**FEDERAL APPLICABLE REQUIREMENTS**  
**The following conditions are federally enforceable.**

**Condition 2: Capping Monitoring Condition**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 2.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6  
6 NYCRR Subpart 227-2

**Item 2.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 2.3:**

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.

**Item 2.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 2.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part

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201 and of the Act.

**Item 2.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY210-00-0 OXIDES OF NITROGEN

**Item 2.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual NOx emissions shall be limited to 22.5 tpy for any consecutive 12-month period. Pratt Paper (NY), Inc. shall calculate the facility wide NOx emissions utilizing the fuel consumption and emission factors acceptable to the Department and calculate on a monthly and total 12 month rolling NOx emissions.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

**Condition 3: Capping Monitoring Condition**

**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7****Item 3.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6

6 NYCRR 231-2.2

**Item 3.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 3.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a

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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.

**Item 3.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 3.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 3.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY998-00-0 VOC

**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes  
Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The total facility-wide emissions of Volatile Organic Compounds (VOC) shall be limited to 24.5 tons per year for any consecutive 12-month period.

The facility must maintain records in a format acceptable to the Department that verify the facility's VOC emission. Upon request, these records must be submitted to the Department.

Records to verify compliance with the permit limit shall be maintained at the facility, which shall include monthly recycled paper production and quantity of VOC containing materials used, and the VOC content of the VOC containing materials and shall calculate the facility wide VOC emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

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Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2018.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 4: Capping Monitoring Condition**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement: 6 NYCRR Subpart 201-7**

**Item 4.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

6 NYCRR Subpart 201-6  
 40 CFR Part 63, Subpart S

**Item 4.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 4.3:**

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.

**Item 4.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 4.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 4.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 0NY100-00-0 TOTAL HAP

**Item 4.7:**

Compliance Demonstration shall include the following monitoring:



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Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide total annual Hazardous Air Pollutants (HAP) emissions shall be limited to 22.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide total HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Averaging Method: 12 MONTH AVERAGE - ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

**Condition 5: Capping Monitoring Condition**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 5.1:**

Under the authority of 6 NYCRR Part 201-7, this condition contains an emission cap for the purpose of limiting emissions from the facility, emission unit or process to avoid being subject to the following applicable requirement(s) that the facility, emission unit or process would otherwise be subject to:

40 CFR Part 63, Subpart S

**Item 5.2:**

Operation of this facility shall take place in accordance with the approved criteria, emission limits, terms, conditions and standards in this permit.

**Item 5.3:**

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

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**Item 5.4:**

On an annual basis, unless otherwise specified below, beginning one year after the granting of an emissions cap, the responsible official shall provide a certification to the Department that the facility has operated all emission units within the limits imposed by the emission cap. This certification shall include a brief summary of the emissions subject to the cap for that time period and a comparison to the threshold levels that would require compliance with an applicable requirement.

**Item 5.5:**

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

**Item 5.6:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

**Item 5.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility wide of any single Hazardous Air Pollutant (HAP) emissions shall be limited to 9.5 tons per year (tpy) for any consecutive 12-month period.

The owner/operator shall establish emission factors from all HAP emitting sources, based on site-specific performance test data, engineering calculations, manufacturer's guarantees, or AP-42. Using the most accurate emission factors available, and actual monthly usage/production, the owner/operator shall calculate the facility wide single HAP emissions on a monthly and total for any consecutive 12-month period.

Facility shall maintain records verifying the emissions calculations.

Monitoring Frequency: MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

**Condition 22: Visible Emissions Limited**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement:6 NYCRR 211.2**

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**Item 22.1:**

Except as permitted by a specific part of this Subchapter and for open fires for which a restricted burning permit has been issued, no person shall cause or allow any air contamination source to emit any material having an opacity equal to or greater than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement: 6 NYCRR 227-1.3 (a)**

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
 DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20 percent opacity (six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. In addition, the Department reserves the right to perform or require the performance of a Method 9 opacity evaluation at any time during facility operation.

The permittee will conduct observations of visible emissions from the emission unit, process, etc. to which this condition applies at the monitoring frequency stated below while the process is in operation. The permittee will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard.

The permittee shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the standard continue, the permittee will conduct a Method 9 assessment within the next operating day of the sources associated with the potential noncompliance to determine the degree of opacity and will notify the NYSDEC if the Method 9 test indicates that the opacity standard is not met.

Records of visible emissions observations (or any follow-up Method 9 tests), investigations and corrective actions will be kept on-site. Should the Department determine that permittee's record keeping format is

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inadequate to demonstrate compliance with this condition, it shall provide written notice to the permittee stating the inadequacies, and permittee shall have 90 days to revise its prospective record keeping format in a manner acceptable to the Department.

Parameter Monitored: OPACITY  
 Upper Permit Limit: 20 percent  
 Monitoring Frequency: ANNUALLY  
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2018.  
 Subsequent reports are due every 12 calendar month(s).

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 2-1: Process Permissible Emissions**  
 Effective between the dates of 02/07/2023 and 12/17/2027

**Applicable Federal Requirement:6 NYCRR Subpart 201-7**

**Item 2-1.1:**  
 The sum of emissions from the regulated process cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

|                |                                  |          |                        |
|----------------|----------------------------------|----------|------------------------|
| Emission Unit: | U-00003                          | Process: | NG2                    |
|                | CAS No: 0NY210-00-0 (From Mod 2) |          |                        |
|                | Name: OXIDES OF NITROGEN         |          |                        |
|                | PTE(s): 49.8 pounds per hour     |          |                        |
|                |                                  |          | 33,155 pounds per year |

**Condition 8: Oxides of nitrogen standard exemption.**  
 Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable Federal Requirement:40CFR 60.44b(k), NSPS Subpart Db**

**Item 8.1:**  
 This Condition applies to Emission Unit: U-00003  
 Process: NG2 Emission Source: B0004

**Item 8.2:**  
 Affected facilities which meet the criteria in paragraphs (j)(1), (j)(2), and (j)(3) and are less than or equal to 73 MW in heat input capacity are exempt from the oxides of nitrogen standards of section 40 CFR 60-Db.44b(k).

**Condition 9: Compliance Demonstration**

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Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable Federal Requirement:6 NYCRR 212-1.6 (a)**

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL  
DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No facility owner or operator shall 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.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING  
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 1-5: Compliance Demonstration**

Effective between the dates of 11/06/2018 and 12/17/2027

**Applicable Federal Requirement:6 NYCRR 212-2.3 (b)**

**Item 1-5.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

**Item 1-5.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Speciated VOC contaminants:  
lbs/hr lbs/yr GC Ca  
Environmental

Rating

Light petroleum distillate (CAS# 008002-05-9)

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|  |       |      |      |
|--|-------|------|------|
| 0.25   | 2169  | 100  | 1.8  |
| B  |       |      |      |
| Dipropylene glycol methyl ether (CAS# 3459-94-8)     |       |      |      |
| 2.14   | 18769 | 1400 | 7.3  |
| B  |       |      |      |
| Triethanolamine (CAS # 00102-71-6)                   |       |      |      |
| 1.54   | 13490 | 12   | 11.1 |
| B  |       |      |      |
| 2,2 - Dibromo-3-nitropropionamide ((CAS# 10222-01-2) |       |      |      |
| 0.08   | 560   | 17   | 0.6  |
| B  |       |      |      |
| Butyl Acrylate (CAS# 00141-32-2)                     |       |      |      |
| 0.03   | 44    | 26   | 0.2  |
| B  |       |      |      |

Where:

lb/hr is actual emissions

AGC is Ambient Guideline Concentration, ug/cubic meter,

Ca is impact at property line in ug/cubic meter.

This analysis is conservative by assuming all emissions are discharges through one of the Emission Unit's six identical emissions points.

Facility owner or operator shall not allow emissions of the air contaminants listed above to violate the requirements specified in Subdivision 212.23(b), Table 4 - Degree of Air Cleaning Required for Non-Criteria Contaminants for the environmental rating assigned to the contaminant by the department.

The listed contaminants have been given an Environmental rating of B for the process emission sources identified above. Emissions of each contaminant with the actual emission rate as listed above have demonstrated at the property line the ambient impacts are below the Annual Guideline Concentration (AGC).

Facility must maintain records to demonstrate that none of the contaminants have had an increased actual emission rate in such a way as to contravene the AGC values. Any 1000 pounds per year increase in the actual emission rate of a contaminant will require a reevaluation of ambient impacts of that contaminant to demonstrate ambient impacts are below the AGC at the fence line of the facility.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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**Condition 14: Compliance Demonstration**

Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable Federal Requirement: 6 NYCRR 234.3 (a) (1) (i)**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

**Item 14.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

A packaging rotogravure, publication rotogravure, or flexographic printing process that uses ink, coating or adhesive containing VOC shall not operate if it: is located in a severe ozone non-attainment area; has an annual potential to emit VOC of 25 tons per year or more; or is located in a facility that has an annual potential to emit VOC of 50 tons per year or more, unless the printing process uses an ink, coating or adhesive with a low VOC content equal to or less than 0.8 kilograms of VOC per kilogram of solids as applied (0.8 kg VOC/ kg solids as applied).

VOC content limits can be met by averaging the VOC content of materials used on a single press (i.e., within a line).

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: INKS, SOLVENTS AND ADHESIVES

Parameter Monitored: VOC

Upper Permit Limit: 0.8 kilograms VOC per kilogram solids applied

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 15: Compliance Demonstration**

Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable Federal Requirement: 6 NYCRR 234.6**

**Item 15.1:**

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The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable Federal Requirement:6 NYCRR 234.7**

**Item 16.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-OOCOR

Regulated Contaminant(s):  
CAS No: 0NY998-00-0    VOC

**Item 16.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES



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Monitoring Description:

Purchase, use, and production records of ink, coating, adhesive, VOCs, solvent, fountain solution and cleaning material must be maintained in a format acceptable to the Department, and upon request, submitted to the Department. Any other information required to determine compliance with this Part must be provided to the Department in an acceptable format. Records must be maintained at the facility for five years.

The results of an analysis or other procedure used to establish compliance with this Part must be provided to the Department. Department representatives shall be permitted, during reasonable business hours, to obtain ink, coating, adhesive, cleaning material and fountain solution samples to determine compliance with this Part.

The owner or operator of a graphic art facility which is not subject to the control requirements of this Part because its annual potential to emit VOC or its total actual VOC emissions, whichever applies is below the applicability criteria, must maintain records in a format acceptable to the Department that verify the facility's annual potential to emit VOC or its total actual VOC emissions. Upon request, these records must be submitted to the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-2: Compliance Demonstration**  
**Effective between the dates of 02/07/2023 and 12/17/2027**

**Applicable Federal Requirement:6 NYCRR 212-2.3 (a)**

**Item 2-2.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-WWTP1

Regulated Contaminant(s):  
 CAS No: 007783-06-4 HYDROGEN SULFIDE

**Item 2-2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

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Monitor scrubber (OCTRL) inlet and outlet H<sub>2</sub>S concentrations with periodic data recording performed electronically and/or manually. Adequate data must be maintained to calculate average H<sub>2</sub>S concentrations and destruction efficiency.

Parameter Monitored: DESTRUCTION EFFICIENCY  
Lower Permit Limit: 90 percent reduction by weight  
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION  
Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-3: Compliance Demonstration**  
**Effective between the dates of 02/07/2023 and 12/17/2027**

**Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)**

**Item 2-3.1:**  
The Compliance Demonstration activity will be performed for:

Emission Unit: U-WWTP1

**Item 2-3.2:**  
Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

The facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants for the environmental rating assigned to the contaminant by the department.

A process emission source emitting an air contaminant and having an emission rate potential (ERP) of less than 0.1 pound per hour and an Environmental Rating of A must meet the annual and short term guideline concentrations for the air contaminant at the fence line of the facility and be less than the PB trigger mass emission limit.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
The initial report is due 1/30/2024.  
Subsequent reports are due every 12 calendar month(s).

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**STATE ONLY ENFORCEABLE CONDITIONS**

**\*\*\*\* Facility Level \*\*\*\***

**NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS**

**This section contains terms and conditions which are not federally enforceable. Permittees may also have other obligations under regulations of general applicability**

**Item A: Emergency Defense - 6 NYCRR 201-1.5**

An emergency, as defined in 6 NYCRR 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 demonstrate, 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 facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the 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 any 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 malfunction provision contained in any applicable requirement.

**Item B: Public Access to Recordkeeping for Facilities With State Facility Permits - 6 NYCRR 201-1.10 (a)**

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance

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with 6 NYCRR Part 616 - Public Access to Records.  
Facility owners and/or operators must submit the records  
required to comply with the request within sixty working  
days of written notification by the Department.

Item C: **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.

**STATE ONLY APPLICABLE REQUIREMENTS**

**The following conditions are state only enforceable.**

**Condition 17: Contaminant List**

**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement: ECL 19-0301**

**Item 17.1:**

Emissions of the following contaminants are subject to contaminant specific requirements in  
this permit (emission limits, control requirements or compliance monitoring conditions).

CAS No: 007783-06-4  
Name: HYDROGEN SULFIDE

CAS No: 0NY100-00-0  
Name: TOTAL HAP

CAS No: 0NY210-00-0  
Name: OXIDES OF NITROGEN

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CAS No: 0NY998-00-0

Name: VOC

**Condition 18: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement:6 NYCRR 201-1.4**

**Item 18.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.

(c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.

(d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 2-4: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 02/07/2023 and 12/17/2027**

**Applicable State Requirement:6 NYCRR 201-1.4**

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**Item 2-4.1:**

(a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.

(b) The facility owner or operator shall compile and maintain records of all equipment maintenance and start-up/shutdown activities when they are expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when required by a permit condition or upon request by the department. Such reports shall state whether an exceedance occurred and if it was unavoidable, include the time, frequency and duration of the exceedance, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous monitoring and quarterly reporting requirements need not submit additional reports of exceedances to the department.

(c) In the event that air contaminant emissions exceed any applicable emission standard due to a malfunction, the facility owner or operator shall notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. In addition, the facility owner or operator shall compile and maintain a record of all malfunctions. Such records shall be maintained at the facility for a period of at least five years and must be made available to the department upon request. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, the air contaminants emitted, and the resulting emission rates and/or opacity.

(d) The department may also require the facility owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.

(e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

**Condition 19: Emission Unit Definition****Effective between the dates of 12/18/2017 and 12/17/2027****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 19.1(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00003

Emission Unit Description:

Rentech Boiler with maximum heat input of 249 MMbtu/hr  
burning natural gas and when available Renewable Natural  
gas (RNG) produced by the facility's wastewater

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pretreatment plant (U-WWTP1) following anaerobic digestion and desulfurization.

RNG heating values are expected to range between 500 and 592 British thermal units per standard cubic foot (Btu/scf). The Rentech boiler will be equipped with fully metered cross limited combustion control, meaning that fuel input (RNG and natural gas) to the boiler will be continuously measured by two independent fuel flow meters. Individual flows for each fuel (Natural Gas, RNG) will be monitored, summed for total fuel input, and recorded on a daily basis. Using the heat contents of each fuel, the control system will calculate the fuel input to the Rentech boiler.

Building(s): MAIN

**Item 19.2(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00004

Emission Unit Description:

Paper machine where pulp is processed into sheets of paper. The process includes the application of various dyes and chemicals.

Building(s): MAIN

**Item 19.3(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00007

Emission Unit Description:

Three 14 MMBtu/hr. natural gas fired space heaters.

Building(s): MAIN

**Item 19.4(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-00010

Emission Unit Description:

One 500 HP (20.4 MMBtu/hr) natural gas and renewable natural gas (RNG), Clever Brooks fired boiler used for the corrugating process. RNG to be produced by the facility's waste water treatment plant.

RNG heating values are expected to range between 500 and 592 British thermal units per standard cubic foot (Btu/scf). The boiler will be equipped with fully metered cross limited combustion control, meaning that fuel input (RNG and natural gas) to the boiler will be continuously measured by two independent fuel flow meters. Individual flows for each fuel (Natural Gas, RNG) will be monitored, summed for total fuel input, and recorded on a daily basis. Using the heat contents of each fuel, the control system will calculate the fuel input to the (Clever

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Brooks) boiler.

Building(s): MAIN

**Item 19.5(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-OOCOR

Emission Unit Description:

This emission unit is for the corrugating operation, which includes the corrugator where paper is transformed into corrugated sheets, and the flexographic operation, which converts corrugated sheets into boxes, including flexographic printing (using water based inks). The corrugated sheet is made from paper (liner and medium), steam, corn starch (glue/adhesive), and various chemicals used in the starch making. The corrugating operation generates some waste (paper trimmings and side trimming). The paper waste/trimmings are collected through a pneumatic system and carried through an enclosed system and filter designed to achieve 99.99% particulate removal. The waste then goes to the bailer for recycling. This process includes cornstarch, water based flexographic inks, and water based glues. VOC/HAP emissions are exhausted through a roof vent is currently not operating. Particulate emissions from the in-clone are released as fugitives from the building.

Building(s): MAIN

**Item 19.6(From Mod 2):**

The facility is authorized to perform regulated processes under this permit for:

Emission Unit: U-WWTP1

Emission Unit Description:

This Unit includes the following wastewater pre-treatment processes and their associated equipment. Emissions from these processes depend on the concentrations of pollutants of concern in the WWTP's influent.

- Equalization tank;
- Wastewater cooling heat exchanger;
- Conditioning tank;
- Anaerobic reactor;
- Sulfothane system and secondary treatment (biogas desulfurization);
- Biogas enclosed backup flare;
- Biogas compressor and dryer;
- Anaerobic sludge tank;
- Flash aeration tank with aeration blowers and submersible aerator;
- Odor Control System
- Dissolved air floatation (DAF);
- Chemical dosing stations; and,
- Vent gas injection to aeration.



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Biogas is generated in the WWTP when organic compounds containing carbon, hydrogen, and oxygen are consumed by bacteria in the absence of oxygen, producing carbon dioxide and methane. The biogas is typically made up of 50-80% methane, 20-50% carbon dioxide, and traces of gases such as hydrogen, carbon monoxide, and nitrogen. The biogas produced by the anaerobic digester is directed to a biogas scrubber (S-SCRUB) for hydrogen sulfide (H<sub>2</sub>S) removal and subsequently combusted in either the boiler (U-00003), or corrugator boiler (U-00010), or in the biogas backup flare (S-FLARE1). The process boiler (U-00003) also combusts natural gas as its main fuel and will combust the biogas as a supplemental fuel, when possible.

Vent gases from the WWTP's equalization tank, conditioning tank, anaerobic reactor, and sulfur settling tank are collected and routed to an odor control system (C-OCTRL) where the gases are scrubbed and then vented to atmosphere.

The sulfur sludge generated in the desulfurization system (S-SCRUB) will be disposed of off-site or sent to the Flash aeration tank (if total suspended solids are within the sewer permit levels).

Once the pre-treatment process is complete, most of the industrial wastewater is discharged to the sanitary sewer, where it is received by NYC DEP's municipal wastewater treatment plant, while a portion is returned to the mill for process use.

Building(s): FLARE  
TANK1  
TANK2  
TANK3  
TANK4  
TANK5  
TANK6

**Condition 20: Renewal deadlines for state facility permits**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement: 6 NYCRR 201-5.2 (c)**

**Item 20.1:**

The owner or operator of a facility having an issued state facility 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.

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**Condition 2-5: CLCPA Applicability**

Effective between the dates of 02/07/2023 and 12/17/2027

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 2-5.1:**

Pursuant to The New York State Climate Leadership and Community Protection Act (CLCPA) and Article 75 of the Environmental Conservation Law, emission sources shall comply with regulations to be promulgated by the Department to ensure that by 2030 statewide greenhouse gas emissions are reduced by 40% of 1990 levels, and by 2050 statewide greenhouse gas emissions are reduced by 85% of 1990 levels.

**Condition 21: Compliance Demonstration**

Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable State Requirement:6 NYCRR 201-5.3 (c)**

**Item 21.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 21.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

Division of Air Resources  
 NYS Dept. of Environmental Conservation  
 Region 2  
 47-40 21st St.  
 Long Island City, NY 11101

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2018.

Subsequent reports are due every 12 calendar month(s).

**Condition 6: Air pollution prohibited**

Effective between the dates of 12/18/2017 and 12/17/2027

**Applicable State Requirement:6 NYCRR 211.1**

**Item 6.1:**

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.

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Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

**\*\*\*\* Emission Unit Level \*\*\*\***

**Condition 23: Emission Point Definition By Emission Unit  
Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 23.1(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00003

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 00007 |                    |                |  |
| Height (ft.): 76      | Length (in.): 4    | Width (in.): 4 |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: B0004 |                    |                |  |
| Height (ft.): 130     | Diameter (in.): 66 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

**Item 23.2(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00004

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 00004 |                    |                |  |
| Height (ft.): 73      | Diameter (in.): 51 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 100I4 |                    |                |  |
| Height (ft.): 73      | Diameter (in.): 51 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 200I4 |                    |                |  |
| Height (ft.): 73      | Diameter (in.): 51 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 300I4 |                    |                |  |
| Height (ft.): 73      | Diameter (in.): 51 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

|                       |                    |                |  |
|-----------------------|--------------------|----------------|--|
| Emission Point: 400I4 |                    |                |  |
| Height (ft.): 73      | Diameter (in.): 51 |                |  |
| NYTMN (km.): 4493.5   | NYTME (km.): 567.5 | Building: MAIN |  |

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Emission Point: 50014  
 Height (ft.): 73 Diameter (in.): 51  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

**Item 23.3(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00007

Emission Point: 00008  
 Height (ft.): 76 Length (in.): 4 Width (in.): 4  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Emission Point: 00009  
 Height (ft.): 65 Length (in.): 4 Width (in.): 4  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Emission Point: 0007A  
 Height (ft.): 40 Diameter (in.): 14  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Emission Point: 0007B  
 Height (ft.): 41 Diameter (in.): 14  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Emission Point: 0007C  
 Height (ft.): 47 Diameter (in.): 14  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

**Item 23.4(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-00010

Emission Point: 00010  
 Height (ft.): 70 Diameter (in.): 24  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

**Item 23.5(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-OOCOR

Emission Point: OOCOR  
 Height (ft.): 36 Length (in.): 6 Width (in.): 6  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

Emission Point: OSILO  
 Height (ft.): 41 Diameter (in.): 12  
 NYTMN (km.): 4493.5 NYTME (km.): 567.5 Building: MAIN

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**Item 23.6(From Mod 2):**

The following emission points are included in this permit for the cited Emission Unit:

Emission Unit: U-WWTP1

Emission Point: AERAT

Height (ft.): 31 Diameter (in.): 489  
 NYTMN (km.): 4493.318 NYTME (km.): 567.548 Building: TANK5

Emission Point: FLARE

Height (ft.): 73 Diameter (in.): 40  
 NYTMN (km.): 4493.32 NYTME (km.): 567.568 Building: TANK5

Emission Point: OROR1

Height (ft.): 29 Diameter (in.): 24  
 NYTMN (km.): 4493.3 NYTME (km.): 567.5 Building: TANK3

**Condition 24: Process Definition By Emission Unit**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement:6 NYCRR Subpart 201-5**

**Item 24.1(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00003

Process: NG2 Source Classification Code: 1-03-006-01  
 Process Description: Firing Natural Gas in 249 mmbtu/hr new boiler.

Emission Source/Control: B0004 - Combustion  
 Design Capacity: 249 million Btu per hour

Emission Source/Control: B0005 - Control  
 Control Type: LOW NOx BURNER

**Item 24.2(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00003

Process: RNG Source Classification Code: 1-03-006-02  
 Process Description:

Rentech boiler burning of scrubbed digester renewable  
 natural gas.

Emission Source/Control: B0004 - Combustion  
 Design Capacity: 249 million Btu per hour

Emission Source/Control: B0005 - Control  
 Control Type: LOW NOx BURNER

**Item 24.3(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

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Emission Unit: U-00004  
 Process: 004 Source Classification Code: 3-07-888-01  
 Process Description:  
 The process includes the application of various dyes and chemicals.

Emission Source/Control: 00004 - Process

**Item 24.4(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00007  
 Process: 007 Source Classification Code: 1-05-001-06  
 Process Description: Natural gas for space heaters

Emission Source/Control: 00007 - Combustion

Emission Source/Control: 00008 - Combustion

Emission Source/Control: 00009 - Combustion

**Item 24.5(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00010  
 Process: GAS Source Classification Code: 1-03-006-02  
 Process Description:  
 One 500 hp (20.4 MMBtu/hr) Cleaver Brooks boiler firing natural gas for the production of steam for the corrugator process and building heat.

Emission Source/Control: OOBLR - Combustion  
 Design Capacity: 500 horsepower (boiler)

**Item 24.6(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-00010  
 Process: RNF Source Classification Code: 1-03-006-02  
 Process Description:  
 Renewable natural gas (RNF) with or without supplemental natural gas for the 500 Hp boiler.

Emission Source/Control: OOBLR - Combustion  
 Design Capacity: 500 horsepower (boiler)

**Item 24.7(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-OOCOR  
 Process: COR Source Classification Code: 4-05-003-01

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107

**Process Description:**

The corrugator transforms rolls of paper into corrugated sheets for use by the flexographic operation in making corrugated boxes and to outside customers. The corrugated sheets are produced from the paper received from the paper machine. At the beginning of the process, paper rolls are loaded on the corrugator at the unwind end of the machine.

The paper travels over a heated drum with steam showers to condition the paper, to be formed into the desired flute by corrugating rolls. As the paper comes out of the corrugating roll, it passes over a glue roll that applies cornstarch as an adhesive on the tips of the flutes, then the top liner is applied to the paper. The web then travels on top of the bridge and comes down through a double backer where starch is applied to the other side of the paper, then the bottom liner is put on the sheet. The board is now traveling through a hot plate section. The hot plates heat sets the starch and the board is bonded when existing the hot plate section. The board then goes through the slitter scorer where the board is custom cut and scored. Then the board goes into the cut off knife and is cut to the correct length. Finished corrugated sheets are either moved to the flexographic operation to make boxes or sent to off-site customers. The flexographic operation converts corrugated sheets into boxes. The corrugated sheet is placed in the machine and pulled through the print stations where one ink color at a time is applied. Then, depending on the type of box, the corrugated sheet is either die cut or slotted, and scored. Some of the machines can also glue the boxes together (using water based glue). At that point the finished box travels on the stacker to be stacked, sent down to the bander line to be added, and is shipped out to the customer. The entire flexographic operation is composed of water based inks and water based glues. The corrugating and flexographic (converting) process is process COR.

Emission Source/Control: INCL0 - Control  
Control Type: FABRIC FILTER

Emission Source/Control: SFILT - Control  
Control Type: FABRIC FILTER

Emission Source/Control: CORRU - Process

Emission Source/Control: OSILO - Process

**Item 24.8(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-OOCOR

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107

Process: FLE Source Classification Code: 4-05-003-01  
 Process Description: Flexographic printing with water based inks.

Emission Source/Control: FLEXO - Process

**Item 24.9(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-WWTP1  
 Process: DGF Source Classification Code: 5-01-007-89  
 Process Description:  
 Enclosed flare burning desulfurized biogas. The backup flare has a design maximum rated heat input rating equal to 28.0 mmBtu/hr.

Emission Source/Control: FLARE - Combustion  
 Design Capacity: 28 million British thermal units

**Item 24.10(From Mod 2):**

This permit authorizes the following regulated processes for the cited Emission Unit:

Emission Unit: U-WWTP1  
 Process: WWT Source Classification Code: 5-01-007-81  
 Process Description:  
 Anaerobic Reactor (Emission Source: RCTOR):

The wastewater treatment plant (WWTP) process includes the treatment of industrial wastewater from the wastepaper recycling process via anaerobic digestion. The WWTP will be designed to treat up to 1 million gallons of wastewater per day from the facility. The WWTP (Process: WWT) includes operation of the following equipment and components: equalization tank; wastewater cooling heat exchanger; conditioning tank; anaerobic reactor; sulfothane system and secondary treatment (biogas desulfurization); biogas compressor and dryer; anaerobic sludge tank; flash aeration tank with aeration blowers and submersible aerator; odor control system; dissolved air floatation (DAF); chemical dosing stations; and, vent gas injection to aeration.

Emission Source/Control: OCTRL - Control  
 Control Type: GAS SCRUBBER (GENERAL, NOT CLASSIFIED)

Emission Source/Control: AERAT - Process  
 Design Capacity: 800 cubic feet per minute (standard conditions)

Emission Source/Control: CONDT - Process  
 Design Capacity: 1,000 gallons

Emission Source/Control: EQUAL - Process



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Design Capacity: 1,000 gallons

Emission Source/Control: RCTOR - Process  
Design Capacity: 692,360 gallons

Emission Source/Control: SCRUB - Process  
Design Capacity: 505 cubic feet per minute (standard conditions)

**Condition 25: Compliance Demonstration**  
**Effective between the dates of 12/18/2017 and 12/17/2027**

**Applicable State Requirement:6 NYCRR 212-2.1 (a)**

**Item 25.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: U-00004

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
Monitoring Description:

For an air contaminant listed in Section 212-2.2 Table 2 – High Toxicity Air Contaminant List, of this Part, the facility owner or operator shall demonstrate compliance with the air cleaning requirements for the HTAC as specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants.

For an HTAC assigned an Environmental Rating of A and has an Emission Rate Potential (ERP) of less than 0.1 pound per hour and annual mass emissions of a persistent and bioaccumulative compound less than the PB Trigger, the owner or operator is required to meet the short term and annual guideline concentration at the fence line of the facility.

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 2-6: Applicability - Issuance of new or modified permit or Registration**  
**Effective between the dates of 02/07/2023 and 12/17/2027**

**Applicable State Requirement:6 NYCRR 212-1.1 (a) (1)**

**Item 2-6.1:**

This Condition applies to Emission Unit: U-WWTP1

Permit ID: 2-6403-00107/00017

Facility DEC ID: 2640300107

**Item 2-6.2:**

Part 212 applies to process emission sources and/or emission points associated with a process operation, unless excepted from the provision of this Part pursuant to Section 212-1.4 of this Subpart:

(1) upon issuance of a new or modified permit or registration for a facility containing process emission sources and/or emission points.

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**Facility DEC ID: 2640300107**