

Facility DEC ID: 410200007

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 4-1020-00007/00009
Mod 0 Effective Date: 08/16/2013 Expiration Date: 08/15/2023
Mod 1 Effective Date: 03/24/2023 Expiration Date: 08/15/2023
SAPA Extended Begin Date: 08/16/2023

Permit Issued To: SWM Holdings US LLC
PO Box 10
Ancram, NY 12502-0010

Contact: PAUL GAUDETTE
PO BOX 10
ANCRAM, NY 12502-0010
(518) 329-5148

Facility: Ancram Mill - SWM Holdings US LLC
2424 St Rte 82
Ancram, NY 12502

Description:

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: PATRICIA M GABRIEL
NYSDEC - REGION 4
1130 N WESTCOTT RD
SCHENECTADY, NY 12306-2014

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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- 4 2 Relationship of this Permit to Other Department Orders and Determinations
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- 5 4 Permit modifications, suspensions or revocations by the Department

Facility Level

- 5 5 Submission of application for permit modification or renewal-REGION 4 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 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:

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 1-1.2:

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

Item 1-1.3

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 4 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 4 Headquarters
Division of Environmental Permits
1130 North Westcott Rd.
Schenectady, NY 12306-2014
(518) 357-2069

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: SWM Holdings US LLC
PO Box 10
Ancram, NY 12502-0010

Facility: Ancram Mill - SWM Holdings US LLC
2424 St Rte 82
Ancram, NY 12502

Authorized Activity By Standard Industrial Classification Code:
None Listed On Application

Mod 0 Permit Effective Date: 08/16/2013

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Mod 1 Permit Effective Date: 03/24/2023

Permit Expiration Date: 08/15/2023

SAPA Extended Begin Date: 08/16/2023

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- 22 19 6 NYCRR 201-7.1: Emission Unit Permissible Emissions

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- 22 20 6 NYCRR 212.4 (c): Compliance Demonstration

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- 23 21 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 24 22 6 NYCRR 228-1.10: Compliance Demonstration

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- 34 31 6 NYCRR 227-1.2 (a) (2): Compliance Demonstration

NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 1/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 1: Facility Permissible Emissions
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Applicaton Specific Data

Condition 2: Capping Monitoring Condition
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

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

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

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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 201 and of the Act.

Item 2.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 2.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
 Monitoring Type: MONITORING OF PROCESS OR CONTROL
 DEVICE PARAMETERS AS SURROGATE
 Monitoring Description:
 Cap emissions of individual HAP facility wide to 8.0 tons
 (16,000 pounds) per year by limiting the amount of solvent
 based coating products used in the paper machines.
 Monthly inventories of coatings used will be conducted at
 the facility, and will assume that 100% of the HAPS
 contained within the coatings used will be emitted during
 paper production. Records verifying the HAPS used shall
 be maintained on site. Records older than five years may
 be discarded.

Process Material: COATING
 Parameter Monitored: SOLVENT
 Upper Permit Limit: 8 tons per year
 Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2014.
 Subsequent reports are due every 6 calendar month(s).

Condition 3: Capping Monitoring Condition
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

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:

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6 NYCRR Subpart 201-6

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 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: 0NY100-00-0 TOTAL HAP

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Cap emissions of hap facility wide to 20.0 tons (40,000 pounds) per year by limiting the amount of solvent based coating products used in the paper machines. Monthly inventories of coatings used will be conducted at the facility, and will assume that 100% of the haps contained within the coatings used will be emitted during paper production. Records verifying the haps used shall be maintained on site. Records older than five years may be discarded.

Process Material: COATING
 Parameter Monitored: SOLVENT
 Upper Permit Limit: 20 tons per year

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Monitoring Frequency: MONTHLY
 Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2014.
 Subsequent reports are due every 12 calendar month(s).

Condition 4: Capping Monitoring Condition
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 201-7.1

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

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: 007446-09-5 SULFUR DIOXIDE

Item 4.7:

Compliance Demonstration shall include the following monitoring:

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Facility DEC ID: 4102000007

Capping: Yes

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

Monitoring Description:

Cap emissions of sulfur dioxide facility-wide to 80.0
tons (160,000 lbs.) per year by limiting the amount of #6
fuel oil burned in the boiler system.

Parameter Monitored: FUEL OIL

Upper Permit Limit: 80 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 5: Capping Monitoring Condition
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 201-7.1

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:

6 NYCRR Subpart 201-6

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.

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:

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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: 0NY998-00-0 VOC

Item 5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility wide emissions of VOC are capped to a limit of 40.0 tons (80,000 pounds) per year by limiting the amount of solvent based coating products used in the paper machines. Monthly inventories of product used will be conducted at the facility, and will assume that 100% of the volatile components within the products will be emitted during paper production. Records verifying the VOC content of the coatings used will be maintained on site. Records older than five years may be discarded.

Process Material: COATING

Parameter Monitored: SOLVENT

Upper Permit Limit: 40 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 6: Capping Monitoring Condition

Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1**Item 6.1:**

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

Item 6.2:

Operation of this facility shall take place in accordance with the approved criteria, emission

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limits, terms, conditions and standards in this permit.

Item 6.3:

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 6.4:

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 6.5:

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 6.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 6.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

Facility wide emissions of oxides of nitrogen from
combusting # 6 oil shall be capped at 80.0 tons (160,000
pounds) per year by limiting the amount of #6 fuel oil
burned in the boiler system.

Parameter Monitored: FUEL OIL

Upper Permit Limit: 80 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

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

Condition 28: Visible Emissions Limited
Effective between the dates of 08/16/2013 and Permit Expiration Date

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Facility DEC ID: 4102000007

Applicable Federal Requirement:6 NYCRR 211.2

Item 28.1:

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 8: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 225-1.2 (b)

Item 8.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: B-OILER

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of any stationary combustion installation that fires oil are limited to the firing of oil with a sulfur content of 1.50% sulfur through June 30, 2014.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.50 percent by weight

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 9: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Applicable Federal Requirement:6 NYCRR 225-1.2 (e)

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of any stationary combustion installation that fires residual oil are limited to the purchase of residual oil with a sulfur content of 0.50% sulfur on or after July 1, 2014 and to the firing of residual oil with a sulfur content of 0.50% on or after July 1, 2016.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.50 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 10: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 225-1.2 (g)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Owners and/or operators of a stationary combustion installation that fires distillate oil other than number two heating oil are limited to the purchase of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2014. Compliance with this limit will be based on vendor certifications.

Data collected pursuant to this Subpart must be tabulated and summarized in a form acceptable to the Department, and must be retained for at least five years. The owner of a Title V facility must furnish to the Department such records and summaries, on a semiannual calendar basis, within 30 days after the end of the semiannual period. All other facility owners or distributors must submit these records and summaries upon request of the Department.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.0015 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 11: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 227-1.3

Item 11.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: B-OILER
 Process: 101

Emission Unit: B-OILER
 Process: 102

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

Operators of oil-fired boilers which are not exempt from permitting and where a continuous opacity monitor is not utilized for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack for each boiler which is operating on

Permit ID: 4-1020-00007/00009

Facility DEC ID: 410200007

oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).

2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

Inclement weather conditions shall be recorded for those days when observations are prohibited. This logbook must be retained at the facility for five (5) years after the date of the last entry.

3) If the operator observes any visible emissions (other than steam - see below) two consecutive days firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence.

The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Monitoring Frequency: DAILY

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 12: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Applicable Federal Requirement:6 NYCRR 228-1.7

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

The maximum permitted pounds of VOC per gallon (minus
water and excluded VOC) of coating at application, for
paper coating lines is 2.9

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING LINES

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 2.9 pounds per gallon

Monitoring Frequency: PER DELIVERY

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 13: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.42c(d), NSPS Subpart Dc

Item 13.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: B-OILER
Process: 101

Emission Unit: B-OILER
Process: 102

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

On or after the date on which the initial performance
test is completed or required to be completed under
section 60.8 of this part, no owner or operator of an
affected facility that combusts oil shall combust oil with

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Facility DEC ID: 4102000007

a sulfur content in excess of 0.5 percent by weight.

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: FUEL OIL
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.50 percent by weight
 Monitoring Frequency: PER DELIVERY
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2014.
 Subsequent reports are due every 6 calendar month(s).

Condition 14: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(c), NSPS Subpart Dc

Item 14.1:

The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

Emission Unit: B-OILER
 Process: 101

Emission Unit: B-OILER
 Process: 102

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each coal-fired, oil-fired, or wood-fired affected facility subject to the opacity limits under 40 CFR 60.43c(c) shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

Subsequent reports are due every 6 calendar month(s).

Condition 15: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(d), NSPS Subpart Dc

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:

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Facility DEC ID: 4102000007

The Compliance Demonstration applies to:

Emission Unit: B-OILER
Process: 101

Emission Unit: B-OILER
Process: 102

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall submit semi-annual reports to the Administrator.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

Subsequent reports are due every 6 calendar month(s).

Condition 16: Compliance Demonstration

Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement: 40CFR 60.48c(f)(2), NSPS Subpart Dc

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: B-OILER
Process: 101

Emission Unit: B-OILER
Process: 102

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The compliance certification shall include the following:

The owner and/or operator of the affected facility shall maintain records containing the following data:

- i) The name of the residual oil supplier;

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ii) the location from which the oil sample was drawn for analysis of the sulfur content. It shall be specifically stated whether the oil was sampled as delivered to the affected facility, or whether the sample was drawn from oil storage at the oil supplier's oil refiner's facility, or other location;

iii) the sulfur content of the oil from which the shipment came (or of the shipment itself); and,

iv) the method used to determine the sulfur content of the oil.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2014.

Subsequent reports are due every 6 calendar month(s).

Condition 17: Alternative recordkeeping
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:40CFR 60.48c(g)(2), NSPS Subpart Dc

Item 17.1:

This Condition applies to:

Emission Unit: BOILER
Process: 103

Emission Unit: BOILER
Process: 104

Item 17.2:

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO₂ standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

Condition 18: Applicability
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 18.1:

Facilities that have reciprocating internal combustion engines must comply with applicable portions of 40 CFR 63 subpart ZZZZ.

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Facility DEC ID: 4102000007

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

Condition 19: Emission Unit Permissible Emissions
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 201-7.1

Item 19.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited

shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: B-OILER

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 0.56 pounds per hour

4,947 pounds per year

Emission Unit: O-THERS

CAS No: 0NY998000 (From Mod 0)

Name: VOC

PTE(s): 4.4 pounds per hour

38,250 pounds per year

CAS No: 0NY100000 (From Mod 0)

Name: TOTAL HAP

PTE(s): 0.6 pounds per hour

5,284 pounds per year

Condition 20: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 212.4 (c)

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: B-HOUSE

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

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Facility DEC ID: 4102000007

In the instances where determination of permissible emission rate using process weight is not applicable (see Table 5) and for an environmental rating of B or C, emissions of solid particulates are limited to less than 0.050 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

The applicable testing shall be determined and submitted for review.

The compliance testing will be conducted at the discretion of the Department and, within acceptable time frame to valid monitoring or limiting requirements.

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.050 grains per dscf
 Reference Test Method: EPA Method 5
 Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT
 Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 21: Compliance Demonstration
 Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement: 6 NYCRR 228-1.3 (b) (1)

Item 21.1:
 The Compliance Demonstration activity will be performed for:

Emission Unit: O-THERS

Item 21.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

The owner or operator of an emission source subject to 6 NYCRR Part 228-1 must maintain the following records in a format acceptable to the department for a period of at least five years:

1. A certification from the coating supplier or manufacturer which lists the parameters used to determine the actual VOC content of each as applied coating used at the facility.
2. Purchase, usage and/or production records of each coating material, including solvents.
3. Records identifying each air cleaning device that has

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an overall removal efficiency of at least 90 percent.

4. Records verifying each parameter used to calculate the overall removal efficiency, as described in Equation 2 of Section 228-1.5(c), if applicable.

5. Any additional information required to determine compliance with Part 228-1.

Upon request, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must submit a copy of the records kept in accordance with this condition to the department within 90 days of receipt of the request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 22: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable Federal Requirement:6 NYCRR 228-1.10

Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: O-THERS

Item 22.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Within the work area(s) associated with a coating line, the owner or operator of a facility subject to this Part must:

- (a) use closed, non-leaking containers to store or dispose of cloth or other absorbent applicators impregnated with VOC solvents that are used for surface preparation, cleanup or coating removal;
- (b) store in closed, non-leaking containers spent or fresh VOC solvents to be used for surface preparation, cleanup or coating removal;
- (c) not use VOC solvents to cleanup spray equipment unless equipment is used to collect the cleaning compounds and to minimize VOC evaporation;
- (d) not use open containers to store or dispense surface coatings and/or inks unless production, sampling,

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maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purpose of applying a coating material to a substrate. These devices may include, but are not limited to: spray guns, flow coaters, dip tanks, rollers, knife coaters, and extrusion coaters;

(e) not use open containers to store or dispose of spent surface coatings, or spent VOC solvents;

(f) minimize spills during the handling and transfer of coatings and VOC solvents; and

(g) beginning on January 1, 2005, clean spray guns used to apply mobile equipment repair and refinishing or color-matched coatings by one of the following:

(1) an enclosed spray gun cleaning system that is kept closed when not in use;

(2) non-atomized discharge of VOC solvent into a paint waste container that is kept closed when not in use;

(3) disassembling and cleaning of the spray gun in a vat that is kept closed when not in use; or

(4) atomized spray into a paint waste container that is fitted with a device designed to capture atomized VOC solvent emissions.

Open containers, if found, shall be covered and such deviations shall be noted in a log maintained in the operating area. The log shall include the following information:

- date and time of observation
- description of observed deviation from this permit condition
- corrective measures taken, if necessary

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Permit ID: 4-1020-00007/00009

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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

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

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 23: Contaminant List

Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement: ECL 19-0301

Item 23.1:

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

CAS No: 007446-09-5
Name: SULFUR DIOXIDE

CAS No: 0NY075-00-0
Name: PARTICULATES

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

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

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

CAS No: 0NY998-00-0
Name: VOC

Condition 24: Malfunctions and start-up/shutdown activities
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement: 6 NYCRR 201-1.4

Item 24.1:

(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 25: Emission Unit Definition
Effective between the dates of 08/16/2013 and Permit Expiration Date

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 25.1(From Mod 0):**

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

Emission Unit: B-HOUSE

Emission Unit Description:

EMISSION UNIT BHOUSE WILL CONSIST OF AN EXISTING TOBACCO STEMS PROCESSING AND EMISSION CONTROL SYSTEM. TOBACCO STEMS MILLED BY A HAMMERMILL AND PASS INTO A CYCLONE SEPARATOR. THE EXHAUST (FINES) FROM THE SEPARATOR ENTER THE BAGHOUSE FILTER, WITH THE EXH AUST FROM THE BAGHOUSE EMITTED TO THE ATMOSPHERE. SOLIDS RECOVERED FROM THE PROCESS ARE SENT TO THE PROCESS AS RAW MATERIALS. THIS EMISSION UNIT HAS ONE (1) PROCESS (201), ONE (1) EMISSION POINT (00002), ONE (1) EMISSION SOURCE (010), AND TWO (2) EMISSION CONTROL DEVICES (011 AND 012) ASSOCIATED WITH IT.

Building(s): MAIN

Item 25.2(From Mod 0):

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

Emission Unit: B-OILER

Emission Unit Description:

Emission Unit B-OILER will consists of two dual fuel (No. 6 and natural gas) boilers operated under the State Facility Permit. Boiler # 5 is a York Shipley Model SPH 800-6-17366 historically permitted as Unit A of Emission Point 00001. The boiler has a maximum heat input of 32.70 mmBTU/hr. The unit is equipped with a Wheelabrator Tublar Mechanical Dust Collector to control particulate emissions. Boiler #6 is a Cleaver-Brooks fire tube boiler with a maximum heat input of 33.48 mmBTU/hr. No emission control is provided on Boiler #6. This emission unit has four processes (101, 102, 103, 104), one Emission Point (00001), two Emission sources (001, 002), and one Emission Control Device (003) associated with it.

Building(s): BOILERHS

Item 25.3(From Mod 0):

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

Emission Unit: O-THERS

Emission Unit Description:

EMISSION UINIT O-THERS WILL CONSIST OF THE NUMBER 20 AND 21 PAPER MACHINES. THE UNITS EACH UTILIZE PAPER COATING PRODUCTS WHICH CONTAIN VOLATILE ORGANIC COMPOUNDS AND HAZARDOUS AIR POLLUTANTS. EMISSIONS FROM

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

THE MACHINES VENT INTO THE MAIN FACILITY BUILDING, AND ARE EXHAUSTED THROUGH GENERAL BUILDING VENTILATION FANS LOCATED IN WALLS AND CEILING. NO EMISSION POINTS ARE ASSOCIATED WITH THIS EMISSION UNIT. THE EMISSION UNIT HAS ONE (1) PROCESS (401), AND TWO EMISSION SOURCES (012 AND 013) ASSOCIATED WITH IT.

Building(s): MAIN

Condition 26: Renewal deadlines for state facility permits
Effective between the dates of 08/16/2013 and Permit Expiration Date

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

Item 26.1:

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.

Condition 27: Compliance Demonstration
Effective between the dates of 08/16/2013 and Permit Expiration Date

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

Item 27.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 27.2:

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 4
1130 N. Westcott Rd.
Schenectady, NY 12306

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 7: Air pollution prohibited
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR 211.1

Permit ID: 4-1020-00007/00009

Facility DEC ID: 410200007

Item 7.1:

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. 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 29: Emission Point Definition By Emission Unit
Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 29.1(From Mod 0):

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

Emission Unit: B-HOUSE

Emission Point: 00002

Height (ft.): 31

Diameter (in.): 8

NYTMN (km.): 4656.

NYTME (km.): 613.

Building: MAIN

Item 29.2(From Mod 0):

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

Emission Unit: B-OILER

Emission Point: 00001

Height (ft.): 96

Diameter (in.): 36

NYTMN (km.): 4656.

NYTME (km.): 613.

Building: BOILERHS

Condition 30: Process Definition By Emission Unit

Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1(From Mod 0):

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

Emission Unit: B-HOUSE

Process: 201

Process Description:

TOBACCO PROCESSING EMISSION CONTROL:
 TOBACCO STEMS ARE MILLED BY A HAMMERMILL.
 MILLED MATERIAL TO CYCLONE SEPARATOR.
 EXHAUST (FINES) FROM SEPARATOR TO BAGHOUSE

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

FILTER. EXHAUST FROM BAGHOUSE TO
ATMOSPHERE. SOLIDS TO MANUFACTURING
PROCESS AS RAW MATERIAL.

Emission Source/Control: 00011 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 00012 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00010 - Process

Item 30.2(From Mod 0):

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

Emission Unit: B-OILER
Process: 101 Source Classification Code: 1-02-004-02

Process Description:
EXISTING YORK SHIPLEY MODEL SPH 800 6
17366 NO. 6 FUEL OIL FIRED (PRIMARY) BOILER
WITH 32.7 MILLION BTU PER HOUR HEAT INPUT.
THE BOILER IS EQUIPPED WITH A WHEELABRATOR
TUBULAR MECHANICAL DUST COLLECTOR TO
CONTROL PARTICULATE EMISSIONS.

Emission Source/Control: 00001 - Combustion
Design Capacity: 32.7 million Btu per hour

Emission Source/Control: 00003 - Control
Control Type: GRAVITY COLLECTOR

Item 30.3(From Mod 0):

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

Emission Unit: B-OILER
Process: 102 Source Classification Code: 1-02-004-02

Process Description:
CLEAVER BROOKS FIRE TUBE BOILER INSTALLED
AT THE FACILITY IN DECEMBER 2001,
REPLACINNG TITUSVILLE SCOTCH MARINE BOILER.
THE UNIT IS UTILIZED AS A BACKUP BOILER,
IS FIRED BY NO. 6 FUEL OIL AND HAS A HEAT
INPUT CAPACITY OF 33.48 MILLION BTU PER
HOUR. NO EMIS ION CONTROL DEVICE IS
PROVIDED FOR THE UNIT, WHICH EXHAUSTS
THROUGH THE EXISTING DUCTWORK AND EMISSION
POINT FORMERLY USED BY THE TITUSVILLE
BACKUP UNIT.

Emission Source/Control: 00002 - Combustion
Design Capacity: 33.48 million Btu per hour

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Item 30.4(From Mod 0):

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

Emission Unit: B-OILER
 Process: 103 Source Classification Code: 1-02-006-02
 Process Description:
 York Shipley (SPH 800-6-17366) boiler with 32.70 MMBTU per hour input combusting natural gas. The boiler is known as Boiler Number 5, and is equipped with a Wheelabrator Tubular Mechanical Dust Collector to control particulate emissions.

Emission Source/Control: 00001 - Combustion
 Design Capacity: 32.7 million Btu per hour

Emission Source/Control: 00003 - Control
 Control Type: GRAVITY COLLECTOR

Item 30.5(From Mod 0):

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

Emission Unit: B-OILER
 Process: 104 Source Classification Code: 1-02-006-02
 Process Description:
 Cleaver-Brooks fire tube boiler with a 33.48 MMBTU/hr input combusting natural gas. The boiler is known as Boiler Number 6, and is not equipped with particulate control equipment

Emission Source/Control: 00002 - Combustion
 Design Capacity: 33.48 million Btu per hour

Item 30.6(From Mod 0):

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

Emission Unit: O-THERS
 Process: 401
 Process Description:
 PAPER MACHINES NUMBER 20 AND 21 USE SOLVENT BASED PAPER COATINGS AND DYE. THESE ACTIVITIES CAUSE VOC AND HAP EMISSIONS TO THE MAIN FACILITY BUILDING, WHICH ARE SUBSEQUENTLY EXHAUSTED THROUGH WALL AND CEILING FANS, AS NO SPECIFIC EMISSION POINTS ARE PRESENTED FOR THESE MACHINES.

Emission Source/Control: 00013 - Process

Emission Source/Control: 00014 - Process

Condition 31: Compliance Demonstration

Permit ID: 4-1020-00007/00009

Facility DEC ID: 4102000007

Effective between the dates of 08/16/2013 and Permit Expiration Date

Applicable State Requirement: 6 NYCRR 227-1.2 (a) (2)

Item 31.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: B-OILER

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 31.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emission limit for a boiler or combination of boilers (connected to the same emission point) with a maximum heat input exceeding 50 mmBtu per hour but no greater than 250 mmBtu per hour firing oil, other than distillate oil.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.20 pounds per million Btus

Reference Test Method: Method 5 / Method 17

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Permit ID: 4-1020-00007/00009

Facility DEC ID: 410200007