

Facility DEC ID: 5415400003

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility  
Permit ID: 5-4154-00003/00019  
Mod 0 Effective Date: 03/20/2019 Expiration Date: 03/19/2029  
Mod 1 Effective Date: 02/16/2024 Expiration Date: 03/19/2029

Permit Issued To: Fedrigoni Waterford Real Estate Holdings LLC  
465 Saratoga St  
Cohoes, NY 12047

Contact: MICHELLE A CARPENTER  
Fedrigoni Waterford Real Estate Holdings, LLC  
465 SARATOGA ST  
COHOES, NY 12047-0497  
(518) 233-6378

Facility: Fedrigoni Waterford Real Estate Holdings, LLC  
1 Oconnor Dr  
Waterford, NY 12188

Description:

WATERFORD IS A NON-INTEGRATED MILL WHICH HAS THE CAPACITY TO PRODUCE approximately 203 TONS PER DAY (TPD) OF FINE WRITING AND PUBLICATION PAPERS (NON-INTEGRATED MILLS UTILIZE PAPER PULP WHICH IS EITHER RECOVERED OR PULPED AND BLEACHED OFFSITE). THE 203 TPD IS BELIEVED TO BE THE CURRENT, COMBINED DESIGN CAPACITY FOR THE TWO (2) PAPER MACHINES AT THIS MILL. NO SIGNIFICANT PRODUCTION CAPACITY INCREASE ABOVE THIS LEVEL CAN BE ACHIEVED WITHOUT EXTENSIVE MODIFICATIONS TO THE PAPER MACHINES AND SUPPORTING MILL INFRASTRUCTURE. FURTHER, NO SIGNIFICANT PROCESS CHANGES ARE PRESENTLY ANTICIPATED (I.E. - SUCH AS ON OR OFF MACHINE COATING OPERATIONS IN ADDITION TO THE ONGOING SIZING OPERATION, ETC.) AT THIS MILL. THEREFORE, THE PROCESSES, AS DESCRIBED IN OTHER PORTIONS OF THIS PERMIT APPLICATION, ARE BELIEVED TO BE AN ACCURATE REFLECTION OF THE "STATUS QUO" AT THIS MILL. THE MILL IS BASICALLY COMPRISED OF THE FOLLOWING OPERATIONS WHICH HAVE BEEN COMBINED INTO "EMITTING UNITS": 1) PAPER MAKING; INCLUDES STOCK PREPARATION, SHEET FORMING AND DRYING, AND SIZING; 2) PAPER CONVERTING; 3) STEAM GENERATION; 4) WASTEWATER TREATMENT; 5) SHIPPING,

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RECEIVING, AND WAREHOUSING; AND 6) MISCELLANEOUS SUPPORT OPERATIONS INCLUDING A MACHINE SHOP AND FIRE SUPPRESSION SYSTEM. OF THESE, THE EMITTING UNITS 1 THROUGH 3 INCLUSIVE AND 6 ARE COMPRISED OF OPERATIONS WHICH EMIT REGULATED AIR CONTAMINANTS.

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:            BETH A MAGEE  
   NYSDEC - WARRENSBURG SUBOFFICE  
   232 GOLF COURSE RD  
   WARRENSBURG, NY 12885-1172

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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**Facility Level**

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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.

**Condition 4: Permit modifications, suspensions or revocations by the Department**

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**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 5  
SUBOFFICE - WARRENSBURG**

**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 5 Sub-office  
Division of Environmental Permits  
232 Golf Course Road  
Warrensburg, NY 12885-1172  
(518) 623-1281

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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: Fedrigoni Waterford Real Estate Holdings LLC  
465 Saratoga St  
Cohoes, NY 12047

Facility: Fedrigoni Waterford Real Estate Holdings, LLC  
1 Oconnor Dr  
Waterford, NY 12188

Authorized Activity By Standard Industrial Classification Code:  
2621 - PAPER MILLS EXC BUILDING PAPER

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Permit Expiration Date: 03/19/2029

Mod 1 Permit Effective Date: 02/16/2024

Permit Expiration Date: 03/19/2029

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- 12 8 6 NYCRR 201-7.1 (a): Emission Unit Permissible Emissions

**EU=P-NYW01**

- 12 9 6 NYCRR 227-1.3 (a): Compliance Demonstration
- 13 10 40CFR 60.42c(d), NSPS Subpart Dc: Fuel Sulfur Limitation
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- 15 12 40CFR 60.43c(d), NSPS Subpart Dc: Enforceability of particulate matter and opacity standards.
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**EU=P-NYW02**

- 17 16 6 NYCRR 212-1.6 (a): Compliance Demonstration
- 18 17 6 NYCRR 212-2.4 (a): Compliance Demonstration

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- 23 1-1 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
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- 27 23 6 NYCRR 211.1: Air pollution prohibited
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- 30 29 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 31 30 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

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, required to operate such device effectively.

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

The owner and/or operator of an emission source or unit

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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)**

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

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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: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement: 6 NYCRR 201-6.4 (e)**

**Item 1.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 1.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

- i. Compliance certifications shall contain:
  - the identification of each term or condition of the permit that is the basis of the certification;
  - the compliance status;
  - whether compliance was continuous or intermittent;
  - the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
  - such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
  - such additional requirements as may be specified elsewhere in this permit related to compliance certification.
  
- ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions

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of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually. Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit anniversary date, unless another quarter has been acceptable by the Department.

iv. All annual compliance certifications may be submitted electronically or physically. Electronic reports shall be submitted using the Department’s Air Compliance and Emissions Electronic-Reporting system (ACE). If the facility owner or operator elects to send physical copies instead, two copies shall be sent to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office) and one copy shall be sent to the Administrator (or his or her representative). The mailing addresses for the above referenced persons are:

Chief – Air Compliance Branch  
 USEPA Region 2 DECA/ACB  
 290 Broadway, 21st Floor  
 New York, NY 10007

The address for the RAPCE is as follows:

Regional Air Pollution Control Engineer  
 Region 5 Suboffice  
 232 Golf Course Road  
 Warrensburg, NY 12885-1172

The address for the BQA is as follows:

NYSDEC  
 Bureau of Quality Assurance  
 625 Broadway  
 Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 1/30/2020.  
 Subsequent reports are due on the same day each year

**Condition 2: Facility Permissible Emissions**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:6 NYCRR 201-7.1 (a)**

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**Item 2.1:**

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

CAS No: 0NY210-00-0 (From Mod 1) PTE: 127,280 pounds  
 per year  
 Name: OXIDES OF NITROGEN

**Condition 3: Capping Monitoring Condition  
 Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:6 NYCRR 201-7.1 (a)**

**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

**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: 0NY210-00-0 OXIDES OF NITROGEN

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**Item 3.7:**

Compliance Demonstration shall include the following monitoring:

Capping: Yes

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Combustion of No. 2 fuel oil at this facility will be limited to 2,675,000 gallons in any 12 month period (annual max, rolled monthly).

This facility fuel limitation will also effectively cap NOx out of Title V applicability and 227-2 (NOx RACT requirements) and SO2 out of Title V applicability.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: NUMBER 2 OIL

Upper Permit Limit: 2675000 gallons

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 1/30/2020.

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

**Condition 4: Visible Emissions Limited**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:6 NYCRR 211.2**

**Item 4.1:**

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 5: Determination of Environmental Rating**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-1.3**

**Item 5.1:**

In accordance with the applicability requirements of Section 212-1.1 of this Part, the department will assign an environmental rating for each air contaminant emitted from each process emission source or emission point in accordance with Subdivisions (a) through (e) of this Section. The factors in Subdivisions (a) through (d) will be considered in making a determination of the environmental rating to be applied to an air contaminant pursuant to subdivision (e), Table 1 - Environmental Rating Criteria.

(a) Toxic and other properties and emission rate potential of the air contaminant;

(b) location of the process emission source or emission point(s) for the air contaminant with

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respect to residences or other sensitive environmental receptors, taking into account the area's anticipated growth;

(c) emission dispersion characteristics at or near the process emission source or emission point(s), taking into account the physical location of the process emission source or emission point(s) relative to the surrounding buildings and terrain; and

(d) the projected maximum cumulative impact of an air contaminant taking into account emissions from all process emission sources at the facility under review and the pre-existing ambient concentration of the air contaminant under review.

**Condition 6: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 007446-09-5      SULFUR DIOXIDE

**Item 6.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall record and maintain records of the amount of fuels combusted during each calendar month in the source, provided that the facility only burns very low sulfur fuel oil or other liquid or gaseous fuels with a potential sulfur dioxide (SO<sub>2</sub>) emissions rate of 0.32 lb/MMBtu (140 ng/J) heat input or less.

Monitoring Frequency: MONTHLY  
 Averaging Method: CALENDAR MONTH TOTAL  
 Reporting Requirements: SEMI-ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 The initial report is due 7/30/2019.  
 Subsequent reports are due every 6 calendar month(s).

**Condition 7: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 8: Emission Unit Permissible Emissions**  
Effective between the dates of 03/20/2019 and 03/19/2029

**Applicable Federal Requirement:6 NYCRR 201-7.1 (a)**

**Item 8.1:**

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: P-NYW01

CAS No: 0NY210000 (From Mod 0)

Name: OXIDES OF NITROGEN

PTE(s): 14.53 pounds per hour

127,280 pounds per year

**Condition 9: Compliance Demonstration**  
Effective between the dates of 03/20/2019 and 03/19/2029

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

**Item 9.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

**Item 9.2:**

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-six-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.

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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 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

Reference Test Method: EPA Method 9

Monitoring Frequency: ANNUALLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Fuel Sulfur Limitation****Effective between the dates of 03/20/2019 and 03/19/2029****Applicable Federal Requirement:40CFR 60.42c(d), NSPS Subpart Dc****Item 10.1:**

This Condition applies to Emission Unit: P-NYW01

**Item 10.2:**

The permittee shall not fire fuel oil which exceeds 0.50 percent sulfur by weight.

**Condition 11: Compliance Demonstration****Effective between the dates of 03/20/2019 and 03/19/2029****Applicable Federal Requirement:40CFR 60.43c(c), NSPS Subpart Dc**

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

**Item 11.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

**Item 11.2:**

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

On and after the date on which the initial performance test is completed or required to be completed under §60.8 of this part, whichever date comes first, no owner or operator of an affected facility that combusts coal, wood or oil and has a heat input capacity of 30 million BTU per hour or greater shall cause to be discharged into the atmosphere from an affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity.

Operators of air contamination sources that 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(s) or vent(s) 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:
  - weather condition
  - was a plume observed?

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, then the 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

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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.

Parameter Monitored: OPACITY

Upper Permit Limit: 27 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6 MINUTE AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

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

**Condition 12: Enforceability of particulate matter and opacity standards.**

Effective between the dates of 03/20/2019 and 03/19/2029

Applicable Federal Requirement:40CFR 60.43c(d), NSPS Subpart Dc

**Item 12.1:**

This Condition applies to Emission Unit: P-NYW01

**Item 12.2:**

The particulate matter and opacity standards of section 40 CFR 60-Dc.43c apply at all times, except during periods of startup, shutdown, and malfunction.

**Condition 13: Compliance Demonstration**

Effective between the dates of 03/20/2019 and 03/19/2029

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

**Item 13.1:**

The Compliance Demonstration activity will be performed for:

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 13.2:**

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.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

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

**Condition 14: Compliance Demonstration**

**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:40CFR 60.48c(e)(11), NSPS Subpart Dc**

**Item 14.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 14.2:**

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 keep records as required under §60.48c(d) including the following information.

If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under paragraph §60.48c(f)(1)(2) or (3). In addition to records of fuel supplier certification, the semi-annual report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the period.

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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 7/30/2019.

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

**Condition 15: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:40CFR 60.48c(f)(1), NSPS Subpart Dc**

**Item 15.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW01

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

**Item 15.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Fuel supplier certification shall include the following information for distillate oil:

- i) The name of the oil supplier, and
- ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c. 60-Dc 41c defines distillate oil as fuel that complies with the specifications for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, A standard Specification for Fuel Oils.
- iii) The sulfur content or maximum sulfur content of the oil.

Monitoring Frequency: PER DELIVERY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2019.

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

**Condition 16: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 16.1:**

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW02

**Item 16.2:**

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 17: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable Federal Requirement:6 NYCRR 212-2.4 (a)**

**Item 17.1:**

The Compliance Demonstration activity will be performed for:

Emission Unit: P-NYW02

Regulated Contaminant(s):

CAS No: 0NY075-00-5 PM-10

**Item 17.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department prior to July 1, 1973 are restricted as follows: No facility owner or operator shall cause or allow emissions of particulate that exceed 0.15 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where the determination of the permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of Subdivisions 212-2.5 (a) and (b) of this Part.

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Facility DEC ID: 541540003

Parameter Monitored: PM-10

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST  
METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY



Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

**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 with 6 NYCRR Part 616 - Public Access to Records.

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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 18: Contaminant List**

**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 18.1:**

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

CAS No: 000050-00-0  
Name: FORMALDEHYDE

CAS No: 000075-07-0  
Name: ACETALDEHYDE

CAS No: 000107-02-8  
Name: ACROLEIN

CAS No: 000127-18-4  
Name: PERCHLOROETHYLENE

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

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

CAS No: 0NY075-00-5  
Name: PM-10

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

**Condition 19: Malfunctions and start-up/shutdown activities**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 19.1:**

- (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

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listed above must be adhered to in such circumstances.

**Condition 1-1: Malfunctions and Start-up/Shutdown Activities**  
**Effective between the dates of 02/16/2024 and 03/19/2029**

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

**Item 1-1.1:**

(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 20: Emission Unit Definition**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

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**Item 20.1(From Mod 0):**

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

Emission Unit: P-NYW01

Emission Unit Description:

FOR THE PURPOSE OF THIS PERMIT APPLICATION, THIS EMISSION UNIT HAS BEEN DEFINED AS THE BOILER HOUSE AND ANCILLARY INSTALLATIONS INCLUDING, BUT NOT LIMITED TO THE NO. 2 FUEL OIL ABOVE GROUND STORAGE TANK (AST). THE BOILER HOUSE, WHICH WAS STARTED UP IN 1997 REPLACING THREE, OLDER COMBUSTION UNITS, GENERATES STEAM FOR MILL OPERATIONS AND HEATING. MILL PROCESSES WHICH USE STEAM PRODUCED ON-SITE INCLUDE:

- 1) REPULPING IN THE STOCK PREPARATION AREA;
- 2) THE DRYER CANS IN THE MAIN AND AFTER DRYER SECTION OF THE PAPER MACHINES; AND 3) FACILITY HEATING REQUIREMENTS IN SELECTED LOCATIONS. THE REPLACEMENT ALSO ENABLED THE MILL TO COMPLY WITH 6NYCRR PART 227-2 (I.E. - NO<sub>x</sub> RACT). ADDITIONALLY, A SEPARATE, NEW STACK WAS ERECTED AS PART OF THE BOILER HOUSE CONSTRUCTION PROJECT WHICH REPLACED THREE STACKS ASSOCIATED WITH THE OLD BOILERS. THE RETIREMENT OF THESE THREE EMISSION POINTS ENABLED MOHAWK FINE PAPER INC. TO CREATE EMISSION REDUCTION CREDITS (ERCS) FOR BOTH NO<sub>x</sub> AND VOCs IN ACCORDANCE WITH 6 NYCRR PART 231. THE NEW BOILER HOUSE CONTAINS TWO BABCOCK & WILCOX PACKAGE BOILERS EACH WITH A DESIGN HEAT INPUT OF 85.3 MMBTU/HR. EACH BOILER UTILIZES A SINGLE COHEN MODEL 460 CPF/LN 24 LOW NO<sub>x</sub> BURNER FIRED PRIMARILY ON NATURAL GAS. NO. 2 FUEL OIL IS USED AS A BACK-UP FUEL AND IS STORED ON SITE IN A 20,000 GALLON NO. 2 FUEL OIL AST. MOHAWK FINE PAPER INC. HAS REQUESTED AND RECEIVED FEDERALLY ENFORCEABLE OPERATING CONDITIONS WHICH LIMIT THE BOILER HOUSE'S POTENTIAL-TO-EMIT (PTE) BELOW THE TITLE V APPLICABILITY THRESHOLDS AS DELINEATED IN 6NYCRR PART 201-6. THE ESSENCE OF THESE OPERATING CONDITIONS (SEE NOTE 2) REQUIRE THE BOILER HOUSE TO MAINTAIN RECORDS AND PERFORM REPORTING TO DEMONSTRATE THAT FOR ANY CONSECUTIVE TWELVE-MONTH PERIOD. NO MORE THAN 2,675,000 GALLONS OF NO. 2 FUEL (I.E. - WITH A SULFUR CONTENT LESS THAN OR EQUAL TO 0.0015%) CAN BE COMBUSTED. THESE FEDERALLY ENFORCEABLE CONDITIONS ARE, AS OF THE DATE OF THIS FACILITY WIDE PERMIT

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Facility DEC ID: 541540003

APPLICATION, BELIEVED TO BE SUFFICIENT TO ADDRESS BOTH THE DEGREE OF OPERATIONAL FLEXIBILITY AND ALTERNATE OPERATING SCENARIOS NECESSARY TO ACCOMMODATE PRODUCTION AT THE MILL. THEREFORE THE EMISSIONS ESTIMATES, AS DELINEATED HEREIN, ARE BELIEVED TO BE REPRESENTATIVE OF THE STATUS QUO FOR THIS EMITTING UNIT FOR SOME TIME TO COME. (NOTE 1) A REQUEST FOR MODIFICATIONS, WHICH INCLUDED FEDERALLY ENFORCEABLE OPERATING CONDITIONS, TO THE ORIGINAL PERMIT ASSOCIATED WITH THIS EMISSION POINT (DESIGNATED AS EP-00005) WAS PREVIOUSLY SUBMITTED TO AND APPROVED BY REGION 5 AIR POLLUTION CONTROL ENGINEER.

Building(s): BH-01

**Item 20.2(From Mod 0):**

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

Emission Unit: P-NYW02

Emission Unit Description:

THE PAPER MACHINES AT THE WATERFORD MILL PRODUCE FINE WRITING AND PUBLICATION PAPERS. THESE PAPERS ARE PRODUCED FROM KRAFT (CHEMICAL) AND POST CONSUMER MARKET PULPS BOTH OF WHICH ARE PURCHASED FROM OFF-SITE MANUFACTURERS. THE PAPER MACHINES EACH HAVE FOUR DISTINCT SECTIONS: 1) THE WET END (FORMING SECTION), 2) A SET OF DRYERS (MAIN DRYING SECTION), 3) ON MACHINE SIZING APPLICATION (SIZING SECTION), AND 4) A SET OF AFTER DRYERS (SECONDARY DRYING SECTION). THE SIZE PRESSES ON EACH MACHINE SEPARATE THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES. THE PRESS IS ACTUALLY A SET OF ROLLERS WHICH APPLIES PRIMARILY STARCH BASED AQUEOUS MIXTURE TO THE PAPER WEB TO ENHANCE ITS PRINTABILITY. THE EMISSION POINTS ASSOCIATED WITH THESE MACHINES HAVE BEEN COMBINED INTO A SINGLE EMISSION UNIT BECAUSE: 1) BOTH MACHINES PRODUCE CHEMICALLY AND PHYSICALLY SIMILAR PAPER(S); AND 2) THE WET END SECTIONS OF BOTH MACHINES SHARE A COMMON PRIMARY EMISSION POINT. ESTIMATES OF EMISSIONS: EMISSIONS FOR THE VARIOUS PROCESSES (F01, D01, & D02) ASSOCIATED WITH THIS EMISSION UNIT WERE ESTIMATED USING EMISSION FACTORS DEVELOPED BY THE NATIONAL COUNCIL ON AIR AND STREAM IMPROVEMENT (NCASI). SPECIFICALLY, EMISSION FACTORS WERE TAKEN FROM: NCASI TECHNICAL BULLETIN NO. 681

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Facility DEC ID: 5415400003

(10/94 ED.) PART VII - "PULP DRYERS AND PAPER MACHINES AT INTEGRATED CHEMICAL PULP MILLS," SECTION C - "MILL K PROCESS DESCRIPTION AND TEST PROGRAM." THE TESTING IMPLEMENTED BY NCASI WAS FOR EMISSIONS OF SELECTED HAPS AND OTHER AIR CONTAMINANTS AT SPECIFIC MILL SITES WHICH VOLUNTEERED INTO THE PROGRAM. MILL "K" IS DESCRIBED AS "...PRODUCING COATED FREESHEET PUBLICATION PAPERS...USING A COMBINATION OF SOFTWOOD AND HARDWOOD PULPS...." MILL "K'S" PAPER MAKING PROCESS IS THEREFORE VERY SIMILAR TO PAPER MAKING OPERATIONS AT MOHAWK'S WATERFORD MILL. NO ADDITIONAL STUDIES HAVE BEEN CONDUCTED BY NCASI SINCE OCTOBER, 1994.

Building(s): PMB01

**Condition 21: Renewal deadlines for state facility permits**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 21.1:**

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 22: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

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

**Item 22.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 22.2:**

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 5  
 232 Golf Course Rd.  
 Warrensburg, NY 12885

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Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 23: Air pollution prohibited**  
Effective between the dates of 03/20/2019 and 03/19/2029

**Applicable State Requirement:6 NYCRR 211.1****Item 23.1:**

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.

**Condition 24: Compliance Demonstration**  
Effective between the dates of 03/20/2019 and 03/19/2029

**Applicable State Requirement:6 NYCRR 212-2.2****Item 24.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000127-18-4 PERCHLOROETHYLENE

**Item 24.2:**

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 limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000127-18-4) Perchloroethylene = 1000 pounds per year

The source owner shall keep records necessary to document that emissions of this contaminant remain below the limit noted above.

Monitoring Frequency: ANNUALLY

Averaging Method: ANNUAL TOTAL

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 25: Compliance Demonstration**  
Effective between the dates of 03/20/2019 and 03/19/2029



Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 25.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 000107-02-8      ACROLEIN

**Item 25.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES  
 Monitoring Description:

The facility owner or operator shall limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit of Acrolien listed as below.

(000107-02-8) Acrolein = 47.42 pounds per year

The source owner shall keep records necessary to document that emissions of this contaminant remain below the limit noted above.

Monitoring Frequency: ANNUALLY  
 Averaging Method: ANNUAL TOTAL  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 26: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 26.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 000050-00-0      FORMALDEHYDE

**Item 26.2:**

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 limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000050-00-0) Formaldehyde = 100 pounds per year

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

The source owner shall keep records necessary to document that emissions of this contaminant remain below the limit noted above.

Monitoring Frequency: ANNUALLY  
 Averaging Method: ANNUAL TOTAL  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 27: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable State Requirement:6 NYCRR 212-2.2**

**Item 27.1:**  
 The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
 CAS No: 000075-07-0 ACETALDEHYDE

**Item 27.2:**  
 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 limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit listed for the individual HTAC.

(000075-07-0) Acetaldehyde = 1000 pounds per year

The source owner shall keep records necessary to document that emissions of this contaminant remain below the limit noted above.

Monitoring Frequency: ANNUALLY  
 Averaging Method: ANNUAL TOTAL  
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 28: Compliance Demonstration**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**Applicable State Requirement:6 NYCRR 225-1.2 (h)**

**Item 28.1:**  
 The Compliance Demonstration activity will be performed for the Facility.

**Item 28.2:**  
 Compliance Demonstration shall include the following monitoring:

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners and/or operators of a stationary combustion installations that fire distillate oil are limited to the firing of distillate oil with 0.0015 percent sulfur by weight or less on or after July 1, 2016. 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

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

**Condition 29: Emission Point Definition By Emission Unit**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**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: P-NYW01

Emission Point: CBN01

Height (ft.): 110 Diameter (in.): 72  
 NYTMN (km.): 4737.978 NYTME (km.): 607.039 Building: BH-01

**Item 29.2(From Mod 0):**

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

Emission Unit: P-NYW02

Emission Point: PMN01

Height (ft.): 4 Diameter (in.): 48

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

NYTMN (km.): 4737.978    NYTME (km.): 607.039    Building: PMB01

Emission Point: PMN02  
 Height (ft.): 55                      Diameter (in.): 60  
 NYTMN (km.): 4737.978    NYTME (km.): 607.039    Building: PMB01

Emission Point: PMN03  
 Height (ft.): 55                      Diameter (in.): 60  
 NYTMN (km.): 4737.978    NYTME (km.): 607.039    Building: PMB01

**Condition 30:    Process Definition By Emission Unit**  
**Effective between the dates of 03/20/2019 and 03/19/2029**

**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: P-NYW01  
 Process: C01                              Source Classification Code: 1-02-006-01  
 Process Description:  
     THIS "PROCESS" COMBUSTS NATURAL GAS TO  
     PRODUCE STEAM WHICH IS USED IN THE  
     PAPERMAKING PROCESS.

Emission Source/Control: BLR01 - Combustion  
 Design Capacity: 85.3 million Btu per hour

Emission Source/Control: BLR02 - Combustion  
 Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB01 - Control  
 Control Type: LOW NOx BURNER

Emission Source/Control: LNB02 - Control  
 Control Type: LOW NOx BURNER

**Item 30.2(From Mod 0):**

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

Emission Unit: P-NYW01  
 Process: C02                              Source Classification Code: 1-02-005-02  
 Process Description:  
     THIS "PROCESS" IS CAPABLE OF COMBUSTING  
     NO. 2 FUEL OIL AS A BACK-UP FUEL IN THE  
     EVENT OF AN INTERRUPTION IN THE SUPPLY OF  
     NATURAL GAS TO PRODUCE STEAM WHICH IS USED  
     IN THE PAPERMAKING PROCESS.

Emission Source/Control: BLR01 - Combustion  
 Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB01 - Control

Permit ID: 5-4154-00003/00019

Facility DEC ID: 541540003

Control Type: LOW NO<sub>x</sub> BURNER**Item 30.3(From Mod 0):**

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

Emission Unit: P-NYW01

Process: C03

Source Classification Code: 1-02-005-02

Process Description:

THIS "PROCESS" IS CAPABLE OF COMBUSTING NO. 2 FUEL OIL AS A BACK-UP FUEL IN THE EVENT OF AN INTERRUPTION IN THE SUPPLY OF NATURAL GAS TO PRODUCE STEAM WHICH IS USED IN THE PAPERMAKING PROCESS.

Emission Source/Control: BLR02 - Combustion

Design Capacity: 85.3 million Btu per hour

Emission Source/Control: LNB02 - Control

Control Type: LOW NO<sub>x</sub> BURNER**Item 30.4(From Mod 0):**

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

Emission Unit: P-NYW02

Process: D01

Source Classification Code: 3-07-004-06

Process Description:

MAIN SECTION DRYERS AND AFTER SECTION DRYERS (NO. 1 PAPER MACHINE): IN THE MAIN SECTION DRYERS OF THE NO. 1 PAPER MACHINE THE PAPER WEB COMES IN DIRECT CONTACT WITH A LARGE NUMBER OF STEAM HEATED, STEEL CYLINDERS KNOWN AS DRYER CANS. AS THE PAPER WEB PASSES THROUGH THE DRYER SECTION, HEAT ENERGY FROM THE DRYER CANS IS TRANSFERRED TO THE WATER IN THE PAPER WEB. THE WATER IS HEATED AND FLASHED OFF FROM THE PAPER WEB AND EXHAUSTED THROUGH A SINGLE, DISCRETE EMISSION POINT (P-MN02). AS PREVIOUSLY MENTIONED, THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES ARE SEPARATED BY A SIZE PRESS. SIZING SOLUTION IS APPLIED WITH A SET OF ROLLERS AND PRIMARILY PROVIDES THE PAPER SHEET WITH RESISTANCE TO PENETRATION BY AQUEOUS SOLUTIONS (I.Ed. - INKS, ET C.). IT CAN ALSO PROVIDE BETTER PHYSICAL PROPERTIES AND IMPROVE CERTAIN SURFACE CHARACTERISTICS WHICH EFFECT PRINTABILITY. THE SIZING SOLUTIONS USED AT THE WATERFORD MILL ARE PRIMARILY STARCH BASED AQUEOUS MIXTURES, FORMULATIONS WILL VARY WITH THE PRODUCTS PRODUCED. THE SIZING SOLUTION ACTS BOTH TO FILL VOIDS IN AND SEAL THE PAPER SHEET

Permit ID: 5-4154-00003/00019

Facility DEC ID: 5415400003

SURFACE. SUBSEQUENT TO APPLICATION OF THE SIZING SOLUTION BY THE PRESS ROLLERS, THE PAPER WEB TRAVELS THROUGH THE AFTER SECTION DRYERS. HERE THE WEB COMES IN DIRECT CONTACT WITH A SECOND SET OF DRYER CANS WHERE HEAT ENERGY IS USED TO FLASH OFF WATER CONTAINED IN THE PREVIOUSLY APPLIED SIZING SOLUTION. THESE EMISSIONS ARE EXHAUSTED THROUGH THE SAME POINT AS THE EMISSIONS FROM THE MAIN SECTION DRYERS ON THIS MACHINE (P-MN02). THE DRYING OF THE SIZED WEB IS BELIEVED NOT TO CONTRIBUTE VOCs OR OTHER REGULATED AIR CONTAMINANTS TO THIS EMISSION POINT BECAUSE: 1) THE SIZING SOLUTION IS AQUEOUS BASED AND CONTAINS ONLY TRACE AMOUNTS OF VOCs AND 2) THE SIZING SOLUTION SEALS THE WEB MITIGATING ANY FURTHER RELEASE OF VOCs FROM THE PAPER. THE MAIN AND AFTER SECTION DRYERS ARE SEPARATED BY A SIZE PRESS.

Emission Source/Control: DSPM1 - Process  
Design Capacity: 51,996 tons per year

**Item 30.5(From Mod 0):**

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

Emission Unit: P-NYW02

Process: D02

Source Classification Code: 3-07-004-06

Process Description:

MAIN SECTION DRYERS AND AFTER SECTION DRYERS (NO. 2 PAPER MACHINE): IN THE MAIN SECTION DRYERS OF THE NO. 2 PAPER MACHINE THE PAPER WEB COMES IN DIRECT CONTACT WITH A SECTION DRYER CANS. AS THE PAPER WEB PASSES THROUGH THIS SECTION OF THE MACHINE, HEAT ENERGY IS TRANSFERRED TO WATER IN THE PAPER WEB. THE WATER IS HEATED AND FLASHED OFF AND EXHAUSTED THROUGH A SINGLE, DISCRETE EMISSION POINT (PMN-03) FOR THIS SECTION OF DRYERS. THE MAIN AND AFTER SECTION DRYERS ON BOTH MACHINES ARE SEPARATED BY A SIZE PRESS. SIZING SOLUTION IS APPLIED WITH A SET OF ROLLERS AND PRIMARILY PROVIDES THE PAPER SHEET WITH RESISTANCE TO PENETRATION BY AQUEOUS SOLUTIONS (I.E. - INKS, ETC.). IT CAN ALSO PROVIDE BETTER PHYSICAL PROPERTIES AND IMPROVE CERTAIN SURFACE CHARACTERISTICS WHICH EFFECT PRINTABILITY. THE SIZING SOLUTIONS USED AT THE WATERFORD MILL ARE PRIMARILY STARCH BASED AQUEOUS MIXTURES, FORMULATIONS WILL VARY WITH THE PRODUCTS

Permit ID: 5-4154-00003/00019

Facility DEC ID: 541540003

PRODUCED. THE SIZING SOLUTION ACTS BOTH TO FILL VOIDS IN AND SEAL THE PAPER SHEET SURFACE. SUBSEQUENT TO APPLICATION OF THE SIZING SOLUTION BY THE PRESS ROLLERS, THE PAPER WEB TRAVELS THROUGH THE AFTER SECTION DRYERS. HERE THE WEB COMES IN DIRECT CONTACT WITH A SECOND SET OF DRYER CANS WHERE HEAT ENERGY IS USED TO FLASH OFF WATER CONTAINED IN THE PREVIOUSLY APPLIED SIZING SOLUTION. THESE EMISSIONS ARE EXHAUSTED THROUGH A DISCRETE POINT ON THIS MACHINE (PME12). THE DRYING OF THE SIZED WEB IS BELIEVED NOT TO CONTRIBUTE TO VOCS OR OTHER REGULATED AIR CONTAMINANTS TO THIS EMISSION POINT BECAUSE: 1) THE SIZING SOLUTION IS AQUEOUS BASED AND CONTAINS ONLY TRACE ORGANIC COMPONENTS DEPENDING ON THE COATING FORMULATION; AND 2) THE SIZING SOLUTION SEALS THE WEB MITIGATING ANY FURTHER RELEASE OF VOCS FROM THE PAPER. THE MAIN AND AFTER SECTION DRYERS ARE SEPARATED BY A SIZE PRESS.

Emission Source/Control: DSPM2 - Process  
Design Capacity: 22,099 tons per year

**Item 30.6(From Mod 0):**

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

Emission Unit: P-NYW02

Process: F01

Source Classification Code: 3-07-004-06

Process Description:

WET END (FORMING SECTION) (BOTH MACHINES):  
THE WET END OF A PAPER MACHINE IS WHERE THE PAPER WEB IS INITIALLY FORMED. THIS PORTION OF THE PAPER MACHINE USES GRAVITY AND MECHANICAL ENERGY TO PERFORM THE INITIAL WATER REMOVAL FROM THE PAPER WEB. THE WEB IS INITIALLY FORMED FROM "WHITE WATER" WHICH IS A SLURRY MIXTURE OF FIBER AND WATER. THIS SOLUTION, AT ITS POINT OF APPLICATION ON THE PAPER MACHINE, IS APPROXIMATELY 99.5 PERCENT WATER (I.E. 0.5% CONSISTENCY). THE WET ENDS OF THE PAPER MACHINES HAVE ONE COMMON DISCRETE EMISSION POINT (PMN-01) WHICH IS THE PRIMARY EXHAUST FOR VACUUM ROLLS ON BOTH PAPER MACHINES. WET END LOW VACUUM BLOWERS ALSO EXIST ON EACH MACHINE AND ARE SHOWN ON THE SITE MAPPING AS PME 18 AND PME 19.

Emission Source/Control: 0WEPM - Process  
Design Capacity: 74,095 tons per year

**Permit ID: 5-4154-00003/00019**

**Facility DEC ID: 5415400003**



**Permit ID: 5-4154-00003/00019**

**Facility DEC ID: 5415400003**