

Facility DEC ID: 5532600004

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 5-5326-00004/00056
Effective Date: 07/23/2024 Expiration Date: 07/22/2034

Permit Issued To: HOLLINGSWORTH & VOSE CO
112 WASHINGTON ST
EAST WALPOLE, MA 02032-1098

Contact: VIRGINIA L HAWRYSZ
HOLLINGSWORTH & VOSE CO
3235 CO RTE 113
GREENWICH, NY 12834
(518) 695-8175

Facility: HOLLINGSWORTH & VOSE-EASTON MILL
3235 CO RTE 113
GREENWICH, NY 12834

Description:

Hollingsworth & Vose Company's Easton Facility is a manufacturer of technical industrial papers and other non-woven fabrics located in the Town of Easton, Washington County. At this facility, various papers or fabrics are formed, coated/saturated and dried/cured using three different paper machines. In all cases, the process begins by spreading a slurry containing wood pulp and/or other fiber onto a former and removing the moisture to form a paper or fabric web. For some formulations, a coating is sprayed onto the web during this part of the process in order to facilitate operations that occur further down the line. All wood pulp and/or other fiber used in the process is purchased from outside suppliers.

From here, the process varies depending upon the product being made. In some cases, no further processing occurs. In most cases, coatings (i.e., binders) are applied and the web is dried again. Sometimes, additional coatings are applied. The paper machines also can cure certain coatings by using natural gas fired curing units. The finished product is rolled into large rolls which may be converted into smaller sizes prior to packaging and shipment.

Processes performed on the three paper machines are grouped together as Emission Unit U-PAPER, and are regulated under 6 NYCRR Part 212, 6 NYCRR Part 228, and 40 CFR 63 Subpart JJJJ. Emissions of formaldehyde has been limited in order to comply with requirements contained in Section 212-2.1. Monitoring and recordkeeping of product usage, formulations produced, and hours operated are required in order to demonstrate compliance with the formaldehyde annual cap. Also, coating processes must use compliant coatings as specified in Subdivision 228-1.4(d) and 63.3320(b)(3), as applicable. These limit the quantity of volatile organic compounds (VOCs) and Hazardous Air Pollutants (HAPs) which are emitted during coating operations. Total HAPs emissions are capped at 48,000 pounds per year, capping the facility out of the major source threshold, which would otherwise require a Title V Facility Permit. Since the facility is not a major source for HAPs, the facility is exempt from applicable requirements under 40 CFR 63 Subpart OOOO and Subpart DDDDD.

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For some of the coatings used, ingredients are first dispersed in a mixer (Emission Source MIXR1) before being charged to the coater head tank. This mixer is the only Emission Source in Emission Unit U-MIXRS and is regulated under 6 NYCRR Part 212. In many cases, coatings are mixed in other tanks which are exempt from permitting requirements.

Pulp from the broke (i.e., the wastepaper from the process) is recovered by first dissolving the material in the Broke Beater (ES BEATR) and then washing the resulting pulp slurry in the Broke Washer (ES WASHR). It is then re-used in the process. Emission Unit U-BROKE covers these emission sources, which are regulated under 6 NYCRR Part 212.

Steam heated can dryers are used to dry the paper or fabric web, with steam provided by two dual fueled (natural gas/No. 6 fuel oil) boilers having rated capabilities of 43.4 MMBTU/hr and 32.5 MMBTU/hr heat input (Emission Sources 00001 and 00002). For Paper Machine No. 10 (PM-10), drying is aided by a Thru-dryer, fired with natural gas. This dryer is exempt from permitting requirements. The two boilers are grouped together as Emission Unit U-BOILR. Particulates are regulated under 6 NYCRR Part 227. Emissions of Sulfur Dioxide (SO2) and Oxides of Nitrogen (NOx) from this facility have been capped at 95 tons per year (tpy) and 83 tpy, respectively. The cap on SO2 serves to cap the facility out of the major source threshold, which would otherwise require a Title V Facility Permit. The cap on NOx emissions serves to cap the combustion units out of Reasonably Available Control Technology (RACT) requirements contained in 6 NYCRR Subpart 227-2 for that containment. Monitoring, recordkeeping and reporting of fuel use are required to demonstrate compliance with these limits. Fuel use for the entire facility is monitored, thereby appropriately accounting for SO2 and NOx emissions from several exempt combustion units in the totals.

In addition to formaldehyde, HAPs, VOCs, SO2, and NOx, the facility is regulated for the following pollutants: Carbon Monoxide (CO), Particulates (PM), and Sulfuric Acid.

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

Facility Level

- 6 5 Submission of application for permit modification or renewal-REGION 5 SUBOFFICE - WARRENSBURG

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

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

Item 4.1:

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

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

****** Facility Level ******

Condition 5: Submission of application for permit modification or renewal-REGION 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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ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

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Permit Issued To: HOLLINGSWORTH & VOSE CO
112 WASHINGTON ST
EAST WALPOLE, MA 02032-1098

Facility: HOLLINGSWORTH & VOSE-EASTON MILL
3235 CO RTE 113
GREENWICH, NY 12834

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

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- 11 *4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 13 5 6 NYCRR 211.2: Visible Emissions Limited
- 13 6 6 NYCRR 212-2.3 (b): Compliance Demonstration
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- 18 12 6 NYCRR 225-1.6 (f): Compliance Demonstration
- 19 13 6 NYCRR 227-1.3 (c): Compliance Demonstration
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- 22 17 40CFR 60, NSPS Subpart A: Applicability of Subpart A General Provisions
- 22 18 40CFR 60, NSPS Subpart JJJJ: Applicability
- 22 19 40CFR 63.3320(b)(3), Subpart JJJJ: Compliance Demonstration
- 23 20 40CFR 63.3410(a), Subpart JJJJ: Compliance Demonstration
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EU=U-BOILR

- 24 22 6 NYCRR 227-1.4 (a): Compliance Demonstration

EU=U-PAPER

- 25 23 6 NYCRR 228-1.3 (a): Compliance Demonstration
- 27 24 40CFR 63.3400(c), Subpart JJJJ: Compliance Demonstration
- 28 25 6 NYCRR 228-1.3 (b) (1): Compliance Demonstration
- 29 26 6 NYCRR 228-1.6 (a): Compliance Demonstration

EU=U-PAPER,EP=008A1,Proc=AAA

- 30 27 6 NYCRR 212-1.5 (e) (2): Compliance Demonstration

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- 34 29 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 35 30 6 NYCRR Subpart 201-5: Emission Unit Definition
- 36 31 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
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NOTE: * preceding the condition number indicates capping.

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FEDERALLY ENFORCEABLE CONDITIONS

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 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 1.1:

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: 007446-09-5	PTE: 190,000 pounds per year
Name: SULFUR DIOXIDE	
CAS No: 0NY100-00-0	PTE: 48,000 pounds per year
Name: TOTAL HAP	
CAS No: 0NY210-00-0	PTE: 166,000 pounds per year
Name: OXIDES OF NITROGEN	

Condition 2: Capping Monitoring Condition
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 2.1:

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

- 6 NYCRR Subpart 201-6
- 40 CFR Part 63, Subpart DDDDD
- 40 CFR Part 63, Subpart OOOO

Item 2.2:

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

Item 2.3:

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

Item 2.4:

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

Item 2.5:

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

Monitoring Description:
 Emissions from all coating and solvent usage at the facility will be limited as follows:

Total HAPs less than or equal to 48,000 pounds per year. This limit applies during all consecutive 12-month periods. Monthly inventories must be conducted to determine coating and solvent usage on a 12-month total, rolled monthly, basis. Records of the HAP makeup of all coatings and solvents shall be maintained at the facility.

Calculations will assume that all HAPs used are emitted from the facility.

To maintain status as a Non-major Facility, the total HAPs are capped and must remain less than 48,000 pounds per

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year. The facility owner or operator shall maintain a copy of all data used to calculate monthly and rolling 12-month total emissions at the facility for a period of at least five years from the date of the record and shall make the records available to the Department upon request. In addition, the facility owner or operator shall prepare and submit an annual capping certification report summarizing the monthly and rolling 12-month total emissions of total HAPs. Each such report shall contain a summary of the data used when preparing it.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: TOTAL HAP

Upper Permit Limit: 48,000 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 3: Capping Monitoring Condition
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 3.1:

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

6 NYCRR Subpart 201-6

6 NYCRR Subpart 227-2

6 NYCRR Subpart 231-2

40 CFR 52.21

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

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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

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:

Facility-wide emissions of NO_x shall not exceed 83 tons per year (166,000 lbs/yr) as determined by summing monthly NO_x emissions during any consecutive 12-month period.

Records shall be maintained on-site which demonstrate compliance with the NO_x emission cap. These records shall include the mass emissions totaled over each month, the total mass emissions over each rolling twelve (12) month period, fuel use (both No. 6 fuel oil and natural gas) and emission factors used in calculating emissions. AP-42 or other approved emission factors shall be used to determine emissions from exempt sources.

Monthly fuel usage quantities shall be used to calculate corresponding monthly NO_x emissions according to the following formulas for the specific fuel burned:

Natural Gas:

$$\text{NO}_x \text{ (lbs/month)} = 0.0001 \text{ lbs/std. cu. ft.} \times \text{NG}$$

where NG is the amount of natural gas burned per month,
in standard cubic feet

No. 6 Fuel Oil:

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$$\text{NOx (lbs/month)} = 5\text{E-7 lbs/BTU} \times 153,300 \text{ BTU/gal} \times \text{FO}$$

where FO is the number of gallons of No. 6 fuel oil burned per month

The cap on NOx emissions serves to cap the combustion units out of Reasonably Available Control Technology (RACT) requirements contained in 6 NYCRR Subpart 227-2 for that contaminant.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 83 tons per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 4: Capping Monitoring Condition
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 4.1:

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

6 NYCRR Subpart 201-6
40 CFR 52.21

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.

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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:

Capping: Yes

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

Monitoring Description:

Facility-wide emissions of SO₂ shall not exceed 95 tons per year (190,000 lbs/yr) as determined by summing monthly SO₂ emissions during any consecutive 12-month period.

Records shall be maintained on-site which demonstrate compliance with the SO₂ emission cap. These records shall include the mass emissions totaled over each month, the total mass emissions over each rolling twelve (12) month period, fuel use (both No. 6 fuel oil and natural gas) and emission factors used in calculating emissions. AP-42 or other approved emission factors shall be used to determine emissions from exempt sources.

Monthly fuel usage quantities shall be used to calculate corresponding monthly SO₂ emissions according to the following formulas for the specific fuel burned:

Natural Gas:

$$\text{SO}_2 \text{ (lbs/month)} = 6\text{E-}7 \text{ lbs/std. cu. ft.} \times \text{NG}$$

where NG is the amount of natural gas burned per month, in standard cubic feet

No. 6 Fuel Oil:

$$\text{SO}_2 \text{ (lbs/month)} = .157\text{S lbs/gallon} \times \text{FO}$$

where FO is the gallons of No. 6 fuel oil burned per month; and

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S is the sulfur content of the No. 6 fuel oil burned, % (assumed to be 0.5% unless documentation shows otherwise)

Parameter Monitored: SULFUR DIOXIDE
Upper Permit Limit: 95 tons per year
Monitoring Frequency: MONTHLY
Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2025.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Visible Emissions Limited
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 211.2

Item 5.1:

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 6: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 6.1:

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

Emission Unit: U-PAPER
Process: 016

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Source owner shall limit the hourly emission rate of formaldehyde from all product formulations other than FH174 to a total of 0.31 lbs or less. An acceptable stack test was completed on December 15, 2021, which demonstrated a formulation emission rate of 0.31 lbs/hr.

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Another acceptable stack test shall be conducted once every five years to re-determine the formulation emission rate. A stack test protocol shall be submitted to the Department within sixty (60) days prior to the test in addition to notification of the time and date of the test. An acceptable report of the measured emissions shall be submitted within sixty (60) days of completion of each test.

When subsequent tests are performed, the latest demonstrated emission rate shall be used to determine formaldehyde emissions. This permit shall be modified to reflect these new numbers. The Department reserves the right to require additional stack testing at its discretion.

The formulations being run on each paper machine shall be monitored and recorded along with the time, date and duration of the run, in order to document that the hourly emission limit is not exceeded. This record shall include acceptable calculations of the formaldehyde emission for each hour that the facility is using a formaldehyde-containing coating other than FH174. The hourly emission rate must meet the applicable limit as stated above.

Parameter Monitored: FORMALDEHYDE
 Upper Permit Limit: 0.31 pounds per hour
 Reference Test Method: 323
 Monitoring Frequency: Once every five years
 Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 7: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 7.1:

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

Emission Unit: U-PAPER
 Process: 016 Emission Source: 0WET9
 Regulated Contaminant(s):
 CAS No: 000050-00-0 FORMALDEHYDE

Item 7.2:

Compliance Demonstration shall include the following monitoring:

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Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Source owner shall limit the hourly emission rate of formaldehyde from Product Formulation FH174 on Paper Machine 9 (PM-9) to a total of 1.71 lbs or less. An acceptable stack test was completed on October 25, 2023, which demonstrated a formulation emission rate of 1.71 lbs/hr. Another acceptable stack test shall be conducted once every five years to re-determine the formulation emission rate. A stack test protocol shall be submitted to the Department within sixty (60) days prior to the test in addition to notification of the time and date of the test. An acceptable report of the measured emissions shall be submitted within sixty (60) days of completion of each test.

When subsequent tests are performed, the latest demonstrated emission rate shall be used to determine formaldehyde emissions. This permit shall be modified to reflect these new numbers. The Department reserves the right to require additional stack testing at its discretion.

The FH174 formulations being run on PM-9 shall be monitored and recorded along with the time, date and duration of the run, in order to document that the hourly emission limit is not exceeded. This record shall include acceptable calculations of the formaldehyde emission rates from FH174 alone for each hour that the facility is operating. The hourly emission rate must meet the applicable limit as stated above.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 1.71 pounds per hour

Reference Test Method: 323

Monitoring Frequency: Once every five years

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 8: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 8.2:

Permit ID: 5-5326-00004/00056

Facility DEC ID: 5532600004

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Annual reports shall be submitted describing the total hours that the coating formulations were in operation. Formaldehyde emissions are based on an hourly emission rate for FH174 on Paper Machine 9 (PM-9) as demonstrated in the October 25, 2023 stack test or an hourly emission rate for all other formaldehyde-containing formulations as demonstrated in the December 15, 2021 stack test. Formaldehyde emissions are calculated based upon an emission rate potential (ERP) of 1.71 lbs/hr for the FH174 formulation and an ERP of 0.31 lbs/hr for all other formaldehyde-containing formulations. Emission calculations use the following formula:

$$[(\text{FH174 Hours of Operation} * (1.71 \text{ lbs/hr})) + ((\text{All Other Formulations Hours of Operation}) * (0.31 \text{ lbs/hr}))]$$

This condition assures compliance of 6 NYCRR Part 212 toxics.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 3800 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 9: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 6 NYCRR 212-2.4 (b)

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 9.2:

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 after July 1, 1973 are restricted as follows:

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No facility owner or operator shall cause or allow emissions of particulate that exceed 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis, except in instances where determination of permissible emission rate using process weight for a specific source category emitting solid particulate is based upon Table 5 and Table 6 of 6 NYCRR 212-2.5 (a) and (b).

Parameter Monitored: PARTICULATES
 Upper Permit Limit: 0.050 grains per dscf
 Reference Test Method: EPA Method 5
 Averaging Method: Arithmetic average of stack test runs
 Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 10: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

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:
 Owners or operators of emission sources that fire residual oil are limited to a 0.50 percent sulfur content by weight of the fuel. Compliance with the sulfur-in-fuel limitation is based on fuel vendor receipts. All fuel vendor receipts must be maintained on site or at a Department approved alternative location for a minimum of five years.

Note - Process sources and incinerators must comply with the above requirements on or after July 1, 2023.

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: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2025.
 Subsequent reports are due every 12 calendar month(s).

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Condition 11: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Owners or operators of emission sources that fire distillate oil are limited to a 0.0015 percent sulfur content by weight of the fuel. Compliance with the sulfur-in-fuel limitation is based on fuel vendor receipts. All fuel vendor receipts must be maintained on site or at a Department approved alternative location for a minimum of five years.

Note - Process sources and incinerators must comply with the above requirements on or after July 1, 2023.

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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 12: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 225-1.6 (f)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must maintain records of excess

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emissions. The owner or operator must submit a written report of the fuel sulfur content exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable sulfur-in-fuel limitation, measured emissions exceeding the applicable equivalent emission rate, and the nature and cause of such exceedances if known, for each calendar quarter, within 30 days after the end of any quarterly period in which an exceedance[s] takes place. These records must be kept on site or at a Department approved alternative location for a minimum of five years.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2024.

Subsequent reports are due every 3 calendar month(s).

Condition 13: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 227-1.3 (c)

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a stationary combustion installation must perform an annual tune-up on each emission source subject to 6 NYCRR Subpart 227-1. Records of the tune-up shall be maintained at the facility or at a Department approved alternative location for a minimum of five years. The records shall, at a minimum, include the date the tune-up(s) occurred and the details of the tune-up procedures for each emission source.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 14: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 228-1.3 (d)

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Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

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 an emission source subject to the requirements of 6 NYCRR Part 228 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, 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) Clean hand held spray guns 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

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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: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 15: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 228-1.4 (d) (3)

Item 15.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-PAPER
Process: 016

Emission Unit: U-PAPER
Process: 017

Emission Unit: U-PAPER
Process: AAA

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility applying coatings to paper film and foil may not use coatings with VOC contents, as applied, which exceed the limits specified in table D-2. The units in table D-2 are in terms of weight of VOC per weight of coating applied.

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Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: COATING
 Parameter Monitored: VOC CONTENT
 Upper Permit Limit: .08 kilograms VOC per kilogram as applied
 Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2025.
 Subsequent reports are due every 12 calendar month(s).

Condition 16: Surface coating access for sampling
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 228-1.6 (c)

Item 16.1:

Representatives of the department must be permitted on the facility owner's property, during reasonable business hours, to obtain coating samples for the purpose of determining compliance with the requirements of 6 NYCRR Part 228-1.

Condition 17: Applicability of Subpart A General Provisions
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:40CFR 60, NSPS Subpart A

Item 17.1:

This emission source is subject to the applicable general provisions of 40 CFR 60. The facility owner is responsible for complying with all applicable technical, administrative and reporting requirements.

Condition 18: Applicability
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ

Item 18.1:

Facilities that have stationary spark ignition internal combustion engines must comply with applicable portions of 40 CFR 60 Subpart JJJJ.

Condition 19: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:40CFR 63.3320(b)(3), Subpart JJJJ

Item 19.1:

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The Compliance Demonstration activity will be performed for the Facility.

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The facility must limit the organic HAP emissions to no more than 20% of the mass of coating solids applied for each month on and after the compliance date of December 5, 2005. Compliance shall be demonstrated using the provisions listed in §63.3370.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: COATING

Parameter Monitored: ORGANIC HAP CONTENT

Upper Permit Limit: 20 percent by weight

Averaging Method: CALENDAR MONTH TOTAL

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 20: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:40CFR 63.3410(a), Subpart JJJJ

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Each owner or operator of an affected source subject to this subpart must maintain the records specified in paragraphs (1) and (2), below, on a monthly basis in accordance with the requirements of Sec. 63.10(b)(1):

(1) Records specified in Sec. 63.10(b)(2) of all measurements needed to demonstrate compliance with this standard, including:

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- (i) Continuous emission monitor data in accordance with the requirements of Sec. 63.3350(d);
 - (ii) Control device and capture system operating parameter data in accordance with the requirements of Sec. 63.3350(c), (e), and (f);
 - (iii) Organic HAP content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(c);
 - (iv) Volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of Sec. 63.3360(d);
 - (v) Overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with the requirements of Sec. 63.3360(e) and (f);
 - (vi) Material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with the requirements of Sec. 63.3370(b), (c), and (d); and
 - (vii) Emission factor development calculations and HAP content for coating materials used to develop the emission factor as needed for Sec. 63.3360(g).
- (2) Records specified in Sec. 63.10(c) for each CMS operated by the owner or operator in accordance with the requirements of Sec. 63.3350(b).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 21: Applicability

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:40CFR 63, Subpart ZZZZ

Item 21.1:

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

**** Emission Unit Level ****

Condition 22: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 227-1.4 (a)

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Item 22.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-BOILR

Item 22.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No owner or operator of a stationary combustion installation subject to this Subpart shall operate an emission source which exhibits greater than 20 percent opacity (based on a six minute average), except for one 6 minute period per hour of not more than 27 percent opacity. The owner or operator will conduct a Method 9 test annually. A report of the results of the test will be submitted to the Department within 30 days of the completion of the Method 9 test. All records generated by the permittee must be maintained at the facility or at an alternative location approved by the Department for a minimum of five years.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: 40 CFR 60, Appendix A, Method 9

Monitoring Frequency: ANNUALLY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 23: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 6 NYCRR 228-1.3 (a)

Item 23.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 23.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: MONITORING OF PROCESS OR CONTROL

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DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations 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?

This logbook must be retained at the facility for five (5) years after the date of the last entry. If the operator observes any visible emissions (other than steam – see below) the permittee will immediately investigate any such occurrence and take corrective action, as necessary, to reduce or eliminate the emissions. If visible emissions persist after corrections are made, the permittee will immediately notify the department and may be required to conduct a Method 9 assessment within 24 hours to determine the degree of opacity.

Records of these observations, investigations and corrective actions will be kept on-site in a format acceptable to the department and the semiannual progress report and annual compliance certifications required of all permittees subject to Title V must include a summary of these instances.

**** 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: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

Permit ID: 5-5326-00004/00056

Facility DEC ID: 5532600004

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 24: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 40CFR 63.3400(c), Subpart JJJJ

Item 24.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Regulated Contaminant(s):

CAS No: 0NY100-00-0 TOTAL HAP

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility must submit a semiannual compliance report according to the following schedule:

The first compliance report is due no later than July 31 or January 31, whichever date follows the end of the calendar half immediately following the compliance date that is specified for the affected source in § 63.3330. Prior to the electronic template being available in CEDRI for one year, the report must be postmarked or delivered by the aforementioned dates. After the electronic template has been available in CEDRI for 1 year, the next full report must be submitted electronically as described in § 63.3400(h).

Each subsequent compliance report must be submitted electronically no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

The semiannual compliance report shall contain the following information:

- company name and address
- statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report
- date of report and beginning and ending dates of the reporting period
- if there were no deviations from any emission limitations (emission limit or operating limit) that apply

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to the facility, a statement that there were no deviations from the emission limitations during the reporting period, and that no continuous monitoring system was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted.

- for each deviation from an emission limitation (emission limit or operating limit) that applied to the facility and that occurs at an affected source where the facility is not using a continuous emission monitoring system to comply with the emission limitations, the compliance report must contain the total operating time of each affected source during the reporting period, information on the number, duration, and cause of deviations (including known causes), if applicable, and the corrective action taken, information on the number, duration, and cause for CPMS down time incidents, if applicable, other than down time associated with zero and span and other calibration checks.

- for each deviation from an emission limit occurring at an affected source where a CEMS is used, the information in §63.3370(c)(2)(vi)(A)-(J) shall be submitted.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 25: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 25.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-PAPER
Process: 016

Emission Unit: U-PAPER
Process: 017

Emission Unit: U-PAPER
Process: AAA

Item 25.2:

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

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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 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

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 26: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement: 6 NYCRR 228-1.6 (a)

Item 26.1:

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

Emission Unit: U-PAPER Process: 016	Emission Source: 0DRY9
Emission Unit: U-PAPER Process: 016	Emission Source: 0WET9
Emission Unit: U-PAPER Process: 016	Emission Source: DRY10
Emission Unit: U-PAPER Process: 0CC	Emission Source: WET10

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Emission Unit: U-PAPER

Process: AAA

Emission Source: 00PM8

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Upon request by the Department, the owner or operator of an emission source subject to 6 NYCRR Part 228-1 must determine the actual VOC content of an as applied coating by measuring the volatile content, water content, density, volume of solids, and weight of solids in accordance with EPA Reference Test Method 311 or Method 24, included in Appendix A of 40 CFR parts 63 and 60 respectively, to demonstrate compliance with the requirements of Part 228-1.

An alternate sampling method that has been approved by both the Department and the Administrator may be used when Method 311 and/or Method 24 are not appropriate.

Reference Test Method: EPA Reference Test Method 311 or 24

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 27: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable Federal Requirement:6 NYCRR 212-1.5 (e) (2)

Item 27.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-PAPER

Emission Point: 008A1

Process: AAA

Item 27.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A process emission source subject to the Federal National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 or Part 63 (see Table 1 of Section 200.9 of this Title) satisfies the requirements of this Part for the respective air contaminant regulated by the Federal standard if the facility owner or operator can demonstrate that the process emission source is in compliance with the relevant Federal regulation.

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Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2025.
Subsequent reports are due every 12 calendar month(s).

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STATE ONLY ENFORCEABLE CONDITIONS

****** Facility Level ******

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

An emergency, as defined in 6 NYCRR subpart 201-2, constitutes an affirmative defense to penalties sought in an enforcement action brought by the department for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;

(2) the equipment at the facility was being properly operated and maintained;

(3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

(b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

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

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

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

Item C: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 28: Contaminant List

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement:ECL 19-0301

Item 28.1:

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: 007446-09-5
 Name: SULFUR DIOXIDE

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

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CAS No: 0NY100-00-0

Name: TOTAL HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

Condition 29: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement: 6 NYCRR 201-1.4

Item 29.1:

(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.

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Condition 30: Emission Unit Definition

Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1:

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

Emission Unit: U-BOILR

Emission Unit Description:

Two (2) boilers with combined heat input capacity of 75.9 mmBtu/hr fired with either No. 6 fuel oil or natural gas.

Building(s): BOILERHOUS

Item 30.2:

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

Emission Unit: U-BROKE

Emission Unit Description:

Broke is processed for reuse in paper making operations. It is first broken down using caustic and steam heat in a beater type mixer (PR 003) vented to emission point 00024. Then washed in a process also using caustic and steam heat in a beater type mixer (PR 004) vented to emission point 00025.

Building(s): EASTON MIL

Item 30.3:

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

Emission Unit: U-MIXRS

Emission Unit Description:

Chemical mixing exhaust system - includes one mixing tank (ES MIXR1) used for mixing of ingredients such as clay and titanium dioxide with liquid ingredients and vented to Emission Point No. 009A7.

Building(s): EASTON MIL

Item 30.4:

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

Emission Unit: U-PAPER

Emission Unit Description:

Paper making operations on Paper Machine Nos. 8, 9 and 10. This includes forming, drying and coating/saturating of a paper or fabric web on each of the three machines. Paper Machine Nos. 8, 9 and 10 also have natural gas fired curing units to enhance sheet properties through additional drying.

Building(s): EASTON MIL

Condition 31: Renewal deadlines for state facility permits

Permit ID: 5-5326-00004/00056

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Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 31.1:

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 32: CLCPA Applicability

Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 32.1:

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

Condition 33: Compliance Demonstration

Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 33.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 33.2:

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

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 34: Air pollution prohibited

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Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement:6 NYCRR 211.1

Item 34.1:

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 35: Determination of Environmental Rating
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement:6 NYCRR 212-1.3

Item 35.1:

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 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 36: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 36.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 36.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For any air contaminant not listed on table 2, unless it is a solid particulate described in subdivision (c) of this section, the facility owner or operator shall not allow emissions of an air contaminant to violate the requirements specified in subdivision 212-2.3(a), table 3 – degree of air cleaning required for criteria air contaminants of this Subpart, or subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants of this Subpart, as applicable, for the environmental rating assigned to the contaminant by the department.

Monitoring Frequency: PER BATCH OF PRODUCT/RAW MATERIAL CHANGE

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2025.

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

Condition 37: Compliance Demonstration
Effective between the dates of 07/23/2024 and 07/22/2034

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

Item 37.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-PAPER

Process: 016

Emission Source: 010SC

Regulated Contaminant(s):

CAS No: 000050-00-0

FORMALDEHYDE

Item 37.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility owner or operator shall not allow emissions of the air contaminant(s) listed above to exceed the requirements specified in Subdivision 212-2.3(b), Table 4 – Degree of Air Cleaning Required for Non-Criteria Air Contaminants. Formaldehyde has been given an Environmental Rating of “A” for the associated process emission sources/emission point. The listed contaminant has been demonstrated to have an emission rate potential (ERP)

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between 0.1 - 1.0 pounds per hour which requires 90% control or Toxic - Best Available Control Technology (T-BACT).

In order to maintain compliance with 6 NYCRR Part 212 Table 4 or T-BACT requirements, operating parameters and work practices have been established in accordance with Part 212-1.5(d) for the process emission sources/emission point. Based on the T-BACT re-evaluation (Renewal 4 Application) use of reformulated coatings to lower formaldehyde content, continuing reformulation efforts for coatings not yet reformulated and maintaining Paper Machine No. 10's wet scrubber (ES 010SC) flow rate at no less than 120 gallons per minute when processing formulations containing formaldehyde is considered T-BACT.

Parameter Monitored: FLOW RATE
 Lower Permit Limit: 120 gallons per minute
 Monitoring Frequency: CONTINUOUS
 Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE AT ANY TIME
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2025.
 Subsequent reports are due every 12 calendar month(s).

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

Condition 38: Emission Point Definition By Emission Unit
Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 38.1:

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

Emission Unit: U-BOILR
 Emission Point: 00018
 Height (ft.): 115 Diameter (in.): 42
 NYTMN (km.): 4774.576 NYTME (km.): 616.473 Building: BOILERHOUS

Item 38.2:

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

Emission Unit: U-BROKE
 Emission Point: 00024
 Height (ft.): 20 Diameter (in.): 12

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NYTMN (km.): 4774.546 NYTME (km.): 616.459 Building: EASTON MIL

Emission Point: 00025

Height (ft.): 14

Diameter (in.): 16

NYTMN (km.): 4774.547 NYTME (km.): 616.45 Building: EASTON MIL

Item 38.3:

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

Emission Unit: U-MIXRS

Emission Point: 009A7

Height (ft.): 26

Diameter (in.): 12

NYTMN (km.): 4774.51 NYTME (km.): 616.396 Building: EASTON MIL

Item 38.4:

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

Emission Unit: U-PAPER

Emission Point: 008A1

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.432 NYTME (km.): 616.36 Building: NO. 14

Emission Point: 008A2

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.428 NYTME (km.): 616.356 Building: NO. 14

Emission Point: 008A3

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.423 NYTME (km.): 616.352 Building: NO. 14

Emission Point: 008A4

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.416 NYTME (km.): 616.347 Building: EASTON MIL

Emission Point: 008A5

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.411 NYTME (km.): 616.342 Building: EASTON MIL

Emission Point: 008A6

Height (ft.): 39

Diameter (in.): 49

NYTMN (km.): 4774.405 NYTME (km.): 616.338 Building: EASTON MIL

Emission Point: 009A1

Height (ft.): 37

Diameter (in.): 24

NYTMN (km.): 4774.516 NYTME (km.): 616.42 Building: EASTON MIL

Emission Point: 009A2

Height (ft.): 37

Diameter (in.): 24

NYTMN (km.): 4774.51 NYTME (km.): 616.415 Building: EASTON MIL

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Emission Point: 009A3
 Height (ft.): 37 Diameter (in.): 24
 NYTMN (km.): 4774.505 NYTME (km.): 616.41 Building: EASTON MIL

Emission Point: 010A1
 Height (ft.): 36 Length (in.): 22 Width (in.): 33
 NYTMN (km.): 4774.533 NYTME (km.): 616.402 Building: EASTON MIL

Emission Point: 010A2
 Height (ft.): 36 Length (in.): 22 Width (in.): 33
 NYTMN (km.): 4774.525 NYTME (km.): 616.394 Building: EASTON MIL

Emission Point: 010A3
 Height (ft.): 31 Length (in.): 18 Width (in.): 18
 NYTMN (km.): 4774.519 NYTME (km.): 616.397 Building: EASTON MIL

Emission Point: 09C10
 Height (ft.): 87 Diameter (in.): 60
 NYTMN (km.): 4774.498 NYTME (km.): 616.392 Building: EASTON MIL

Condition 39: Process Definition By Emission Unit
 Effective between the dates of 07/23/2024 and 07/22/2034

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 39.1:

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

Emission Unit: U-BOILR
 Process: 001 Source Classification Code: 1-02-004-02
 Process Description:
 Two large boilers whose combined heat input capacity is 75.9 MMBtu/hr; this process involves firing them with No. 6 fuel oil. Both boilers are subject to 40 CFR 60, Subpart Dc and 6 NYCRR Part 227.

Emission Source/Control: 00001 - Combustion
 Design Capacity: 43.4 million Btu per hour

Emission Source/Control: 00002 - Combustion
 Design Capacity: 32.5 million Btu per hour

Item 39.2:

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

Emission Unit: U-BOILR
 Process: 002 Source Classification Code: 1-02-006-02
 Process Description:
 Two large boilers whose combined heat input capacity is 75.9 MMBtu/hr; this process involves firing them with natural gas in accordance with 40 CFR 63, Subpart JJJJJJ.

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Natural gas boilers that burn liquid fuel for periodic testing of liquid fuel, maintenance, or operator training, not to exceed a combined total of 48 hours during any calendar year, are included in this definition. Natural gas boilers that burn liquid fuel during periods of gas curtailment or gas supply interruptions of any duration are also included in this definition.

Emission Source/Control: 00001 - Combustion
 Design Capacity: 43.4 million Btu per hour

Emission Source/Control: 00002 - Combustion
 Design Capacity: 32.5 million Btu per hour

Item 39.3:

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

Emission Unit: U-BROKE
 Process: 003 Source Classification Code: 3-07-999-99
 Process Description:
 Exhaust vent from broke beater. Caustic is added to broke and broke is steam heated. Vapors are vented to outside air.

Emission Source/Control: BEATR - Process

Item 39.4:

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

Emission Unit: U-BROKE
 Process: 004 Source Classification Code: 3-07-999-99
 Process Description:
 Exhaust vent from broke wash beater. Caustic is added to broke and broke is steam heated. The vapors are vented to the outside air.

Emission Source/Control: WASHR - Process

Item 39.5:

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

Emission Unit: U-MIXRS
 Process: 00A Source Classification Code: 4-02-013-03
 Process Description:
 Chemical mixing of ingredients such as clay and titanium dioxide.

Emission Source/Control: MIXR1 - Process

Item 39.6:

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

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Emission Unit: U-PAPER

Process: 016

Source Classification Code: 4-02-013-01

Process Description:

Various coatings/binders may be applied to the paper web at different points, depending upon the machine being used and the formulation being made. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units. Emissions from Paper Machine No. 10's "dry-end" (DRY10) are vented to wet scrubber (010CS) and exhausted through emission point 09C10.

Emission Source/Control: 010SC - Control

Control Type: WET SCRUBBER

Emission Source/Control: 0DRY9 - Process

Emission Source/Control: 0WET9 - Process

Emission Source/Control: DRY10 - Process

Item 39.7:

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

Emission Unit: U-PAPER

Process: 017

Source Classification Code: 4-02-013-01

Process Description:

Various coatings/binders may be applied to the web at different points, depending on the machine and the formulation being used. The coated/saturated sheet passes over steam dryer cans to drive off volatile material. Some coatings/binders may also be cured using natural gas fired heating units.

Emission Source/Control: 0DRY9 - Process

Emission Source/Control: 0WET9 - Process

Item 39.8:

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

Emission Unit: U-PAPER

Process: 0AA

Source Classification Code: 3-07-999-01

Process Description:

On No. 8 Paper Machine, a wet web of paper passes over steam heated can dryers. For some papers, sprays are applied (see Process ID AAA). For some papers, infrared curing is used to enhance paper properties. Exhausts are vented to 4 emission points on roof. In addition, 2 emission points may be added to this source as previously

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approved.

Emission Source/Control: 00PM8 - Process

Item 39.9:

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

Emission Unit: U-PAPER

Process: 0BB

Source Classification Code: 3-07-999-99

Process Description:

On Paper Machine No. 9 wet end, a wet web of paper is formed and passes over steam heated can dryers. For some papers, sprays are applied (see Process ID 016). The exhausts are vented to 3 emission points on roof.

Emission Source/Control: 0WET9 - Process

Item 39.10:

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

Emission Unit: U-PAPER

Process: 0CC

Source Classification Code: 3-07-999-99

Process Description:

On Paper Machine No. 10 a wet web of paper is formed and passes over steam heated can dryers and thru-dryer. The exhausts are vented to 3 emission points on roof.

Emission Source/Control: WET10 - Process

Item 39.11:

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

Emission Unit: U-PAPER

Process: AAA

Source Classification Code: 4-02-013-01

Process Description:

Coatings are sprayed onto the paper web on Paper Machine No. 8.

Emission Source/Control: 00PM8 - Process

Permit ID: 5-5326-00004/00056

Facility DEC ID: 5532600004