

Facility DEC ID: 6210900021

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

**IDENTIFICATION INFORMATION**

Permit Type: Air State Facility

Permit ID: 6-2109-00021/00006

Effective Date:

Expiration Date:

Permit Issued To:TWIN RIVERS PAPER COMPANY LLC

501 W Main St

Little Falls, NY 13365

Contact: RICHARD PETRIE  
Twin Rivers Paper Company  
501 W Main St  
Little Falls, NY 13365-1829  
(315) 266-1722

Facility: TWIN RIVERS PAPER COMPANY - MOHAWK VALLEY  
489 W MAIN ST  
Little Falls, NY 13365

Description:

The Department has received a request for renewal of a permit with an installation of a new boiler and has made a tentative determination pursuant to Article 19 (Air Pollution Control) of the Environmental Conservation Law, subject to public comment or other information, to approve a renewal Air State Facility Permit (ASF) to Twin Rivers Paper Company LLC. for their Mohawk Valley Papermill plant located at 489 West Main St., Little Falls, NY 13365. The primary Standard Industrial Classification (SIC) representative of this facility is 2621 (Paper Mills Exc Building Paper), the secondary SIC are 2631 (Paperboard Mill) and 2647 (Sanitary Paper Products). The facility engages in the production of multiple paper products.

The ASF permit allows the operation of emission unit 6-00001, which includes a 47.0 MMBtu/hr Bigelow boiler with the addition of a 32.8 MMBtu/hr Cleavers Brooks boiler as the main boiler while the previous boiler will be a backup, and emission unit 6-00002, which consist of a paper machine line with a wet end, vacuum pump system, dryer hood, and chemical area. The facility is classified as a natural minor with no caps required.

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The facility is also subjected to federal regulations 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60 JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, and 40 CFR 63 ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

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:                   **TODD J PHILLIPS**  
  **NYSDEC - UTICA SUBOFFICE**  
  **207 GENESEE ST**  
  **UTICA, NY 13501**

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

**Facility DEC ID: 6210900021****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 6 SUBOFFICE - UTICA

**Facility DEC ID: 6210900021****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 transferable 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.

**Facility DEC ID: 6210900021****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 6**  
**SUBOFFICE - UTICA**  
**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 6 Sub-office  
Division of Environmental Permits  
State Office Building, 207 Genesee Street  
Utica, NY 13501-2885  
(315) 793-2555

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## Permit Under the Environmental Conservation Law (ECL)

## ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

## IDENTIFICATION INFORMATION

Permit Issued To:TWIN RIVERS PAPER COMPANY LLC  
501 W Main St  
Little Falls, NY 13365

Facility: TWIN RIVERS PAPER COMPANY - MOHAWK VALLEY  
489 W MAIN ST  
Little Falls, NY 13365

Authorized Activity By Standard Industrial Classification Code:  
2621 - PAPER MILLS EXC BUILDING PAPER  
2631 - PAPERBOARD MILLS  
2647 - SANITARY PAPER PRODUCTS(1977)

Permit Effective Date: \_\_\_\_\_ Permit Expiration Date: \_\_\_\_\_

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- 15 13 ECL 19-0301: Contaminant List
- 15 14 6 NYCRR 201-1.4: Malfunctions and Start-up/Shutdown Activities
- 16 15 6 NYCRR Subpart 201-5: Emission Unit Definition
- 17 16 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 18 17 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 18 18 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 19 19 6 NYCRR 211.1: Air pollution prohibited

**Emission Unit Level**

- 19 20 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 20 21 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

## 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: Visible Emissions Limited  
Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 211.2**

**Item 1.1:**

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 2: Compliance Demonstration  
Effective for entire length of Permit**

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

**Item 2.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 2.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility owner or operator shall conduct a visible emissions observation of all emission points and emission sources specified by this condition once per day while the process is in operation.

- 1) Observe the stack for each emission source which is operating, once per day for visible emissions. This observation(s) must be conducted during daylight hours, but not during periods of adverse weather conditions (fog, rain, or snow).

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

- date and time of observation
- observer's name
- identity of the emission point
- weather conditions
- was a plume observed

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

3) If the operator observes any visible emissions (other than steam - see below) for two consecutive days, either a Method 9 or Method 22 analysis (based upon the source emitting the visible emissions) of the affected emission point(s) or emission source(s) must be conducted within two (2) business days of such occurrence. The results of either the Method 9 or Method 22 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing either the Method 9 or Method 22 analysis if the opacity standard has been contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

The facility owner or operator shall make any necessary corrections and verify that the excess visible emissions problem has been corrected.

All records kept pursuant to this condition must be provided to the Department upon request.

Reference Test Method: See Monitoring Description

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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**Condition 3:      Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)**

**Item 3.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 3.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility demonstrated compliance with Part 212 for emissions of air contaminants to the outdoor atmosphere from the process emission source once per permit term modeling, see Modeling Report dated May 24, 2024. Any future change(s) to the facility may result in additional modeling or further evaluation that shall be approved by the Department.

Any proposed product change that is expected to result in emissions of an air contaminant exceeding 100 pounds per year or that exceeds the Mass Emission Limit listed in part 212 from the facility shall be authorized through either a permit modification or advance notification, as outlined in 6 NYCRR 201-5.4. A proposed product change does not include use of a new product for research and development activities as defined in 6 NYCRR 201-2.1(b)(27). Research and development activities meeting the conditions outlined in 6 NYCRR 201-1.16 do not require a permit modification.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 4:      Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 212-2.1 (b)**

**Item 4.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 4.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall maintain adequate records of monthly material usage to demonstrate compliance for each air

contaminant subject to Part 212. These records shall be maintained by the facility for a period of five years. The facility shall submit these records to the Department upon request.

Monitoring Frequency: MONTHLY  
Reporting Requirements: ANNUALLY (CALENDAR)  
Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

**Condition 5: Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement:6 NYCRR 212-2.1 (b)**

**Item 5.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 068439-46-3      ETHOXYLATED C9-11 ALCOHOLS

**Item 5.2:**

Compliance Demonstration shall include the following monitoring:

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

#### Monitoring Description:

The facility emits multiple contaminants from raw materials containing proprietary compositions. The facility must limit emissions of these contaminants by limiting the emission of Oxylated Alcohols to 214 pounds during any 12 month period.

The facility shall maintain records of monthly material usage containing Oxylated Alcohol and quantify emissions each month. The most recent calculated monthly emissions of Oxylated Alcohol shall be added to the calculated values from the preceding 11 months to determine the 12 month rolling total.

These records shall be maintained for five years. The facility shall submit records of monthly material usage to the Department upon request.

Parameter Monitored: ETHOXYLATED C9-11 ALCOHOLS

Upper Permit Limit: 214 pounds per year

Monitoring Frequency: MONTHLY

#### Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

## Reporting Requirements: ANNUALLY (CALENDAR)

Reporting Requirements: FINRA 2017 (CME) Reports due 30 days after the reporting period.

Reports due 30 days after the reporting period.  
Subsequent reports are due every 12 calendar month(s).

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**Condition 6:      Compliance Demonstration**  
**Effective for entire length of Permit**

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

**Item 6.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):  
CAS No: 0NY075-00-0      PARTICULATES

**Item 6.2:**

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:

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 7:      Compliance Demonstration**  
**Effective for entire length of Permit**

**Applicable Federal Requirement: 6 NYCRR 226-1.3**

**Item 7.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 7.2:**

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Owners or operators conducting solvent cleaning processes must:

(a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than

20 percent of the waste solvent (by weight) can evaporate into the atmosphere;

(b) maintain equipment to minimize leaks and fugitive emissions;

(c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;

(d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning parts in a cold cleaning degreaser;

(e) create and maintain a record of solvent consumption for five years. This record must be retained for five years and made available to the department upon request;

(f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser and

(g) if using a cold cleaning degreaser that is subject to paragraph 6 NYCRR 226-1.4(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, bill of sale, a certificate covering multiple sales, manufacturers published information, or other appropriate documentation acceptable to the Department may be used to comply with this requirement:

(1) name and address of the solvent supplier;

(2) the type of solvent including the product or vendor identification number; and

(3) the VOC content of the cleaning solution in grams per liter (gm/l) to verify compliance.

#### Monitoring Frequency: PER DELIVERY

### Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 8: Compliance Demonstration**  
Effective for entire length of Permit

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

**Item 8.1:**

The Compliance Demonstration activity will be performed for the Facility.

**Item 8.2:**

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, at an Air State facility subject to this Subpart which is permitted to fire only natural gas, 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 upon the request of the Department. 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: UPON REQUEST OF REGULATORY AGENCY

### Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Averaging Method: 6 MINUTE AVERAGE (METHOD 5),  
Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

**Condition 9: Compliance Demonstration  
Effective for entire length of Permit**

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

### Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

**Item 9.2:**

Compliance Demonstration shall include the following monitoring:

#### Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

### Monitoring Description:

The owner and operator of each affected facility shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7 of this part. This notification shall include:

- (1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
- (2) If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under 40 CFR 60.42c., or 40 CFR 60.43c.
- (3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel

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fired.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 10: Alternative recordkeeping  
Effective for entire length of Permit**

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

**Item 10.1:**

As an alternative to meeting the requirements of 40 CFR 60.48c(g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub>standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

**Condition 11: Applicability  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 60, NSPS Subpart JJJJ**

**Item 11.1:**

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

**Condition 12: Applicability  
Effective for entire length of Permit**

**Applicable Federal Requirement:40CFR 63, Subpart ZZZZ**

**Item 12.1:**

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

**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 13: Contaminant List  
Effective for entire length of Permit**

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

**Item 13.1:**

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

CAS No: 068439-46-3  
Name: ETHOXYLATED C9-11 ALCOHOLS

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

**Condition 14: Malfunctions and Start-up/Shutdown Activities  
Effective for entire length of Permit**

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**Applicable State Requirement:6 NYCRR 201-1.4****Item 14.1:**

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

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

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

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

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

**Condition 15: Emission Unit Definition  
Effective for entire length of Permit****Applicable State Requirement:6 NYCRR Subpart 201-5****Item 15.1:**

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

Emission Unit: 6-00001

Emission Unit Description:

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Emission Unit #6-00001 is a steam generating boiler utilized for producing steam for the paper machine and building heating. The current boiler is a 47.0 MMBtu/hr Bigelow boiler that operates on natural gas only. The boiler is connected to a common stack, emission point #00001. This emission point is a 130 foot brick stack with an inside diameter of 6 feet. The 47.0 MMBtu/hr Bigelow boiler will be used as back-up once construction of the new 32.8 MMBtu/hr Cleaver Brooks boiler is complete.

Building(s): FINWHSE  
LOADING  
NORTH (1)  
OLD MACH  
SOUTH (1)

**Item 15.2:**

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

Emission Unit: 6-00002

Emission Unit Description:

The paper machine at the facility is considered emission unit 6-00002. This emission unit has a total of nine emission points for the dryer hood and process area. Five of the exhaust points directly from the paper machine (EPs 9,14-17) consist of one from the vacuum pump system, three from the wet end of the paper machine, and one from the dryer hood of the paper machine. Three EPs (EPs 10-12) are exhaust fans from the pulping area of the process and one other, emission point 13 is the exhaust fan from the chemical mixing area. The pollutants emitted from these points are hazardous air pollutants, regulated air pollutants, volatile organic compounds from the chemicals used in the paper making process, and particulate matter.

Building(s): CENTER (1)  
CENTER (2)  
CENTER (3)  
FIBERS  
NORTH (2)  
PULPER  
SOUTH (2)  
SOUTH (3)

**Condition 16:      Renewal deadlines for state facility permits  
Effective for entire length of Permit**

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

**Item 16.1:**

The owner or operator of a facility having an issued state facility permit shall submit a complete



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NYS Dept. of Environmental Conservation  
 Region 6  
 State Office Building  
 317 Washington Ave.  
 Watertown, NY 13601

Monitoring Frequency: ANNUALLY  
 Reporting Requirements: ANNUALLY (CALENDAR)  
 Reports due 30 days after the reporting period.  
 Subsequent reports are due every 12 calendar month(s).

**Condition 19: Air pollution prohibited  
 Effective for entire length of Permit**

**Applicable State Requirement: 6 NYCRR 211.1**

**Item 19.1:**

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

**Condition 20: Emission Point Definition By Emission Unit  
 Effective for entire length of Permit**

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

**Item 20.1:**

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

Emission Unit: 6-00001

Emission Point: 00001  
 Height (ft.): 130 Diameter (in.): 75  
 NYTMN (km.): 4764.421 NYTME (km.): 510.339 Building: SOUTH (1)

**Item 20.2:**

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

Emission Unit: 6-00002

Emission Point: 00009  
 Height (ft.): 39 Diameter (in.): 8  
 NYTMN (km.): 4764.456 NYTME (km.): 510.375 Building: SOUTH (3)

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Emission Point: 00010  
 Height (ft.): 22 Diameter (in.): 36  
 NYTMN (km.): 4764.402 NYTME (km.): 510.319

Emission Point: 00011  
 Height (ft.): 22 Diameter (in.): 36  
 NYTMN (km.): 4764.456 NYTME (km.): 510.375

Emission Point: 00012  
 Height (ft.): 22 Diameter (in.): 36  
 NYTMN (km.): 4764.415 NYTME (km.): 510.332

Emission Point: 00013  
 Height (ft.): 37 Diameter (in.): 36  
 NYTMN (km.): 4764.426 NYTME (km.): 510.349

Emission Point: 00014  
 Height (ft.): 32 Diameter (in.): 38  
 NYTMN (km.): 4764.445 NYTME (km.): 510.365

Emission Point: 00015  
 Height (ft.): 32 Diameter (in.): 38  
 NYTMN (km.): 4764.451 NYTME (km.): 510.371

Emission Point: 00016  
 Height (ft.): 32 Diameter (in.): 38  
 NYTMN (km.): 4764.454 NYTME (km.): 510.375

Emission Point: 00017  
 Height (ft.): 41 Length (in.): 111 Width (in.): 71  
 NYTMN (km.): 4764.464 NYTME (km.): 510.396

**Condition 21: Process Definition By Emission Unit**  
**Effective for entire length of Permit**

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

**Item 21.1:**

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

Emission Unit: 6-00001  
 Process: 012 Source Classification Code: 1-02-006-02

**Process Description:**

This process is emission unit 6-00001 for the Bigelow steam generating boiler. The boiler is 47 mmbtu/hr firing natural gas only. The Bigelow boiler utilizes emission point #00001. The permit will include construction of a Cleaver Brooks used as the main boiler and the Bigelow as a backup boiler utilizing emission point #00001. The pollutant emissions characteristics of both boiler are summarized as follows:

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## Cleaver Brooks:

Particulate Matter (Total) - 0.0075 lbs/MMBtu -0.246  
lbs/hour - 2155 lbs/year (manufacturer's data);  
Sulfur Dioxides - 0.0006 lbs/MMBtu - 0.0282 lbs/hour - 247  
lbs/year (manufactuer's data);  
Nirogen Oxides - 0.0350 lbs/MMBtu - 1.148 lbs/hour -  
10,056.5 lbs/year (manufactuer's data);  
Carbon Monoxide - 0.034 lbs/MMBtu - 1.60lbs/hour -  
10,774.8 lbs/year (manufactuer's data)  
Volatile Organic Compounds - 0.0036 lbs/MMBtu - 0.118  
lbs/hour - 1,034.4 lbs/year (manufactuer's  
data)

## Bigelow Boiler:

Particulate Matter (Total) - 0.003 lbs/MMBtu -0.141  
lbs/hour - 1,235 lbs/year (manufacturer's data);  
Sulfur Dioxides - 0.0006 lbs/MMBtu - 0.0282 lbs/hour - 247  
lbs/year (EPA AP-42 Standard);  
Nirogen Oxides - 0.136 lbs/MMBtu - 6.39 lbs/hour - 55,994  
lbs/year (manufactuer's data);  
Carbon Monoxide - 0.0375 lbs/MMBtu - 1.23lbs/hour - 13,990  
lbs/year (manufactuer's data)  
Volatile Organic Compounds - 0.00272 lbs/MMBtu - 0.128  
lbs/hour - 1,119 lbs/year (EPA AP-42 Standard)

Emission Source/Control: 00001 - Combustion

Design Capacity: 47 million Btu per hour

Emission Source/Control: 00006 - Combustion

Design Capacity: 32.8 million Btu per hour

**Item 21.2:**

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

Emission Unit: 6-00002

Process: 173

Source Classification Code: 3-07-004-01

## Process Description:

Emission unit #00002 is comprised of a paper machine with nine (9) emission points from the paper making process.

The paper machine at the facility produces a maximum of 50 tons of paper per day. The drying of the paper sheet is completed as the sheet of paper passes across a series of three foot diameter dryer rolls that are heated with steam produced by the boiler at the facility. In the paper making process, chemicals and the paper dyes are used that contain volatile organic compounds, regulated air pollutants, and hazardous air pollutants. These pollutants are exhausted through nine (9) emission points.

Particulate matter is also generated from the dying of the paper and cutting and preparing of the final roll of paper

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for the customer.

Emission Source/Control: 00002 - Process

Design Capacity: 50 tons per day

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