



PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-2148-00037/00001
Effective Date: 04/21/2014 Expiration Date: 04/20/2024

Permit Issued To: LIGNETICS OF NEW ENGLAND INC
1075 E SOUTH BOULDER RD #210
LOUISVILLE, CO 80027

Contact: MARK SNELL
Lignetics of New England Inc - Schuyler
172 DIAMOND DR
FRANKFORT, NY 13340
(315) 368-0181

Facility: SCHUYLER WOOD PELLET LLC
172 DIAMOND DR
FRANKFORT, NY 13340

Description:

This permit change is Renewal #1, which was performed to create a 10 year expiration date and also to add a new emission point to the permit.

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: PATRICK M CLEAREY
NYSDEC - UTICA SUBOFFICE
207 GENESEE ST
UTICA, NY 13501

Authorized Signature: _____ Date: ____ / ____ / ____



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.



LIST OF CONDITIONS

DEC GENERAL CONDITIONS

General Provisions

- Facility Inspection by the Department
- Relationship of this Permit to Other Department Orders and Determinations
- Applications for permit renewals, modifications and transfers
- Permit modifications, suspensions or revocations by the Department

Facility Level

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



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 expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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



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

New York State Department of Environmental Conservation

Permit ID: 6-2148-00037/00001

Facility DEC ID: 6214800037



Permit Under the Environmental Conservation Law (ECL)

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

IDENTIFICATION INFORMATION

Permit Issued To: LIGNETICS OF NEW ENGLAND INC
1075 E SOUTH BOULDER RD #210
LOUISVILLE, CO 80027

Facility: SCHUYLER WOOD PELLET LLC
172 DIAMOND DR
FRANKFORT, NY 13340

Authorized Activity By Standard Industrial Classification Code:
2499 - WOOD PRODUCTS, NEC

Permit Effective Date: 04/21/2014

Permit Expiration Date: 04/20/2024



LIST OF CONDITIONS

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

- 1 6 NYCRR 200.7: Maintenance of Equipment
- 2 6 NYCRR 201-1.8: Prohibition of Reintroduction of Collected Contaminants to the air
- 3 6 NYCRR 202-1.1: Required Emissions Tests
- 4 6 NYCRR 200.7: Compliance Demonstration
- 5 6 NYCRR 201-3.1 (a): Exempt and Trivial Activities Applicability
- 6 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 7 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 8 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 9 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 10 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
- 11 6 NYCRR Subpart 201-7: Facility Permissible Emissions
- *12 6 NYCRR Subpart 201-7: Capping Monitoring Condition
- 13 6 NYCRR 211.1: Air pollution prohibited
- 14 6 NYCRR 212.4 (c): Compliance Demonstration
- 15 6 NYCRR 212.6 (a): Compliance Demonstration
- 16 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 17 6 NYCRR 212.11 (b) (5): Compliance Demonstration
- 18 6 NYCRR Part 226: Compliance Demonstration
- 19 6 NYCRR Part 226: Compliance Demonstration
- 20 6 NYCRR 227-1.3 (a): Compliance Demonstration

Emission Unit Level

- 21 6 NYCRR Subpart 201-7: Emission Unit Permissible Emissions

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 22 ECL 19-0301: Contaminant List
- 23 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
- 24 6 NYCRR Subpart 201-5: Emission Unit Definition
- 25 6 NYCRR 201-5.1 (a) (1): General Conditions - Synthetic Minor Facilities Obtaining State Facility Permits
- 26 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
- 27 6 NYCRR 201-5.3 (c): Compliance Demonstration
- 28 6 NYCRR 211.2: Visible Emissions Limited
- 29 6 NYCRR 211.2: Compliance Demonstration

Emission Unit Level

- 30 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
- 31 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.



FEDERALLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation.

Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

If an existing emission source was subject to the permitting requirements of 6 NYCRR Part 201 at the time of construction or modification, and the owner and/or operator failed to apply for a permit for such emission source then the following provisions apply:

(a) The owner and/or operator must apply for a permit for such emission source or register the facility in accordance with the provisions of Part 201.

(b) The emission source or facility is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing sources or facilities.

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

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

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

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

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

The owner and/or operator of an emission source or unit that is eligible to be exempt, may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit that is listed as being trivial in 6 NYCRR Part 201 may be required to certify that it operates within the specific criteria described in 6 NYCRR Subpart 201-3. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 6 NYCRR Subpart 201-3, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

Except as allowed by section 215.3 of 6 NYCRR Part 215, no person shall burn, cause, suffer, allow or permit the burning of any materials in an open fire.

Item K: Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item L: Federally Enforceable Requirements - 40 CFR 70.6 (b)



All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to 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: Maintenance of Equipment
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 200.7

Item 1.1:

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

Condition 2: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 201-1.8

Item 2.1:

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.

Condition 3: Required Emissions Tests
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 3.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time.

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Condition 4: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 200.7

Item 4.1:

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

Emission Unit: 1-DRYER
Process: 009

Emission Unit: 1-DRYER Emission Point: 00008
Process: 009 Emission Source: 00022

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall maintain the physical integrity of the plastic strip curtains (known as Source 00022) that enclose the open wall of the kiln dried receiving bin. The dry nature of the sawdust that is dumped and contained herein is known to cause this material to escape and become airborne. Facility shall monitor the curtains and keep records of performed maintenance. Curtain deterioration is not to be considered unavoidable.

Monitoring Frequency: MONTHLY
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 5: Exempt and Trivial Activities Applicability
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 201-3.1 (a)

Item 5.1:

If the facility owner and/or operator performs any of the exempt and trivial activities listed in 6 NYCRR Part 201-3.2(c) or 201-3.3(c), such activities are exempt from the permitting provisions of 6 NYCRR Part 201-5, but not from other Parts of 6 NYCRR Chapter III, or from applicable permitting requirements of local air pollution control agencies.

Condition 6: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024



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Applicable Federal Requirement:6 NYCRR 201-6.4 (b) (1)

Item 6.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYER Emission Point: 00001

Emission Unit: 2--FORM Emission Point: 00003

Emission Unit: 2--FORM Emission Point: 00006

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

Item 6.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility shall re-conduct RM 25A on a five-year interval to verify that facility-wide VOC emissions do not exceed this 10.5 lbs/hr compliance standard (the major source threshold). Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 10.5 pounds per hour

Reference Test Method: EPA Reference Method 25A

Monitoring Frequency: Once every five years

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 7: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 201-6.4 (b) (1)

Item 7.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYER Emission Point: 00001

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

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

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Monitoring Description:

Facility shall re-conduct EPA Reference Methods 1 through 5 on a five-year interval to verify that particulate emissions from the above-referenced emission point do not exceed the 0.05 grains per dry standard cubic foot of exhaust gas compliance standard. Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Stack test results shall be reported in terms of gr/dscf and also in lbs/hr. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA Reference Methods 1 thru 5

Monitoring Frequency: Once every five years

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 8: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement: 6 NYCRR 201-6.4 (b) (1)

Item 8.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYER

Emission Point: 00001

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

CAS No: 000071-43-2 BENZENE

CAS No: 000107-02-8 ACROLEIN

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility shall conduct EPA Reference Method 430 for acrolein and formaldehyde and also EPA Reference Method 18 for benzene on a five-year interval to determine that these emissions do not exceed the 2.054 lbs/hr compliance standard of 9 ton/yr. These stack test results shall be added to the stack test results of 9/28/2012 and 9/29/2012 for evaluating against 9 ton/yr. Note: The major source threshold for a speciated HAP is 10 tons/yr ... facility-wide. Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. The Department may suspend the requirement for further ongoing HAP testing if the initial baseline test is sufficiently low. Stack test reports shall be

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maintained at the facility for a period of not less than five years.

Upper Permit Limit: 2.054 pounds per hour
Reference Test Method: EPA Reference Method 430 & Reference Method 18
Monitoring Frequency: Once every five years
Averaging Method: 1-HOUR AVERAGE
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 9: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement: 6 NYCRR 201-6.4 (b) (1)

Item 9.1:

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

Emission Unit: 1-DRYER
Process: 008

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

Item 9.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall calculate and report wind-driven fugitive particulate emissions that emanate from the outdoor area that is south of Building #1, the main production building. Sawdust particles are known to be generated in Process 008, from Sources 00019 and 00021, which includes 4 outdoor silos, several conveyors, the fire dump box, the outdoor yard area, front loader/Bobcat movement and other chip piles. In November 2009, this emission rate was reported to be 0.01% by weight of the total wood material processed (mass of finished pellets). There is no emission point for these Sources. Facility shall record and report the total wood material processed and then apply the appropriate emission factor on each Annual Monitoring Report.

Monitoring Frequency: ANNUALLY
Averaging Method: ANNUAL TOTAL
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 10: Compliance Demonstration

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Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 201-6.4 (b) (1)

Item 10.1:

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

Emission Unit: 1-DRYER Emission Point: 00001

Regulated Contaminant(s):
CAS No: 000630-08-0 CARBON MONOXIDE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Facility shall re-conduct EPA Reference Method 10 on a five-year interval to verify that facility-wide carbon monoxide (CO) emissions do not exceed this 21.5 lbs/hr compliance standard (the major source threshold). Facility shall provide to the Department, an approvable test protocol at least 30 days prior to the test date. Stack test reports shall be maintained at the facility for a period of not less than five years.

Upper Permit Limit: 21.5 pounds per hour

Reference Test Method: EPA Reference Method 10

Monitoring Frequency: Once every five years

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 11: Facility Permissible Emissions

Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 11.1:

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: 000630-08-0 PTE: 190,000 pounds per year
Name: CARBON MONOXIDE

Condition 12: Capping Monitoring Condition

Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

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Monitoring Description:

CAP:

The facility shall avoid a 100 ton/yr exceedence of the carbon monoxide by maintaining a minimum burner firing temperature of 1,790 degrees Fahrenheit while chip-drying operations are underway. Emissions of VOC, acrolein, formaldehyde and benzene are similarly contained on a surrogate basis.

RECORDS:

This firing temperature shall be continuously monitored via the plant SCADA system and then calculated using a 15-minute average. During an aborted stack test on 10/23/08, carbon monoxide emissions were known to achieve 81 lbs/hr while the furnace fired at lower temperatures, therefore it is known that CO will rise in the absence of temperature control. Facility shall maintain ongoing readiness to demonstrate the burner firing history (via SCADA) to the Department representative. These records shall be maintained at the facility for a minimum five year period.

REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's burner firing temperature had not fallen below 1,790 degrees Fahrenheit while chip drying was underway.

NONCOMPLIANCE:

Any noncompliance with the 1,790 degree firing temperature lower limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: TEMPERATURE

Upper Permit Limit: 1,790 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: 15 Minute Average

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 13: Air pollution prohibited
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR 211.1

Item 13.1:

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,



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pollen, toxic or deleterious emission, either alone or in combination with others.

Condition 14: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement: 6 NYCRR 212.4 (c)

Item 14.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYER	Emission Point: 00001
Emission Unit: 1-DRYER	Emission Point: 00004
Emission Unit: 1-DRYER	Emission Point: 00008
Emission Unit: 1-DRYER	Emission Point: 00009
Emission Unit: 2--FORM	Emission Point: 00003
Emission Unit: 2--FORM	Emission Point: 00006
Emission Unit: 2--FORM	Emission Point: 00010

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

Item 14.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of solid particles are limited to less than 0.05 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions and on a dry gas basis.

SWP, in their Annual Monitoring Report, shall attest to compliance by (daily) visually monitoring and recording the exhaust plume from each involved emission point. These observations shall be recorded in a log book which shall submitted annually and shall be retained for a minimum five year period.

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.05 grains per dscf
Reference Test Method: EPA Reference Methods 1 - 5 if requested by NYSDEC
Monitoring Frequency: DAILY

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recorded in a log book which shall be submitted annually and shall be retained for a five-year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make an equivalent entry in the log.

Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: Observe plume daily, RM 9 upon NYSDEC request
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 16: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement: 6 NYCRR 212.11 (b) (5)

Item 16.1:

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

Emission Unit: 1-DRYER Emission Point: 00004
Process: 001 Emission Source: 00023

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

Item 16.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:
GREEN HAMMERMILL - The particulate capture efficiency of

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

Monitoring Description:

BAGHOUSES FOR KD, COOLER/MILLS, DRY HAMMERMILL & PACKAGING LINE: The particulate capture efficiency of these control devices shall be ensured by providing effective baghouse maintenance that is in accord with the manufacturer's specifications and/or empirical history. Baghouses shall be operated within the referenced pressure drop parameters while the associated baghouse is in operation. Manometer readings below 0.5" WC and above 4" WC shall require immediate root cause analysis and then followed by expedient corrective action. Manometers shall be monitored and recorded continuously (via SCADA) and while the baghouse is in operation. This record and all other baghouse maintenance records shall be kept for a minimum period of five years.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 0.5 inches of water

Upper Permit Limit: 4 inches of water

Reference Test Method: EPA Reference Methods 1 - 5 if requested by NYSDEC

Monitoring Frequency: CONTINUOUS

Averaging Method: RANGE - NOT TO FALL OUTSIDE OF STATED
RANGE AT ANY TIME

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 18: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR Part 226

Item 18.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility operates one cold cleaning degreaser that is exempt from permitting per 6 NYCRR 201-3.2(c)(39)(i).

Annually, facility shall monitor and record degreasing solvent usage. Solvent vendor receipts shall be retained



as records of solvent addition/removal. Annually, VOC emissions from solvent usage shall be calculated per current MSDS or TDS information and also reported in the Annual Monitoring Report. The solvent in use in 2013 is "Mineral Spirits 142", which is 100% VOC. Records shall be maintained for a minimum period of five years.

Monitoring Frequency: ANNUALLY
Averaging Method: ANNUAL TOTAL
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 19: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement: 6 NYCRR Part 226

Item 19.1:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

6NYCRR 226. Requirements for Cold Cleaning Degreasers
(Non Title V after 12/31/2003)

A. Equipment Specifications

The following types of control equipment must be used when conducting cold cleaning degreasing, solvent metal cleaning:

- (1) A cover which can be operated easily.
- (2) An internal drainage facility (under cover), if practical.
- (3) A control system that limits VOC emissions to those achievable with equipment having a freeboard ratio greater than or equal to 0.5, or a water cover when the solvent is insoluble in and heavier than water. This does not apply to remote reservoir degreasers.
- (4) Solvent with a vapor pressure of 1.0 mm Hg, or less, at 20 C.

B. Operating Requirements:



When cold cleaning, the clean parts must be drained at least 15 seconds or until dripping ceases.

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) 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.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed from the degreaser;
 - (b) adding or removing solvent from the degreaser;
 - (c) no solvent is in the degreaser; or
 - (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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

Condition 20: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

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

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Item 20.1:

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

Emission Unit: 1-DRYER Emission Point: 00001
Process: 001 Emission Source: 00001

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

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall operate a stationary combustion installation which exhibits greater than 20% opacity (6 minute average), except for one six-minute period per hour of not more than 27% opacity.

EPA Reference Method 9 is the only formal determinate of opacity compliance and the Department reserves the right to perform or to require the performance of a RM 9.

In the absence of a formal RM 9, facility shall attest to opacity compliance by visually monitoring and recording the magnitude of optical density of the exhaust plume from each referenced emission point. This observation shall be made once per day and while the source is operating. The observer shall not consider that portion of the plume that is due to water vapor. These observations shall be recorded in a log book which shall be submitted annually and shall be retained for a five year period.

If dense emissions (any that are greater than "clear" or "very minimal") are observed for two consecutive days, then facility shall:

- 1) Immediately investigate the root cause and take appropriate corrective action.
- 2) Conduct a certified EPA Reference Method 9 visible emission test
- 3) Notify the NYSDEC, Division of Air Resources, Region 6
- 4) If the Method 9 test determines that the opacity is less than 20%, then an appropriate log entry of "very minimal" shall be recorded.
- 5) If the RM9 certified observer detects opacity greater than 20%, then facility shall make an equivalent entry in the log.

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Parameter Monitored: OPACITY
Upper Permit Limit: 20 percent
Reference Test Method: EPA Reference Method 9 if requested by NYSDEC
Monitoring Frequency: DAILY
Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

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

Condition 21: Emission Unit Permissible Emissions
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 21.1:

The sum of emissions from all regulated processes specified in this permit for the emission unit cited shall not exceed the following Potential to Emit (PTE) rates for each regulated contaminant:

Emission Unit: 2--FORM

CAS No: 000071-43-2

Name: BENZENE

PTE(s): 18,000 pounds per year



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 by 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 be demonstrated 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 permitted facility causing the emergency was at the time being properly operated and maintained;

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

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

Where facility owners and/or operators keep records pursuant to compliance with the requirements of 6 NYCRR Subpart 201-5.4, and/or the emission capping requirements of 6 NYCRR Subpart 201-7, the Department will make such records available to the public upon request in accordance with 6 NYCRR Part 616 - Public Access to Records.



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 22: Contaminant List
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:ECL 19-0301

Item 22.1:

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: 000071-43-2
Name: BENZENE

CAS No: 000107-02-8
Name: ACROLEIN

CAS No: 000630-08-0

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Name: CARBON MONOXIDE

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 0NY998-00-0

Name: VOC

Condition 23: Malfunctions and start-up/shutdown activities
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR 201-1.4

Item 23.1:

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

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

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

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

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

Condition 24: Emission Unit Definition



Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

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

Emission Unit: 1-DRYER

Emission Unit Description:

This emission unit consists of all manufacturing operations that precede and include the generation of dried wood chips. Specifically, these operations include the operation of the green hammermill (initial sizing of incoming wood raw material), the green hammermill baghouse, the wood-fired furnace, the rotary kiln dryer, the six cyclones, the 70 foot main stack, the two outdoor dried-chip silos, the kiln dried sawdust bin and the baghouse for the kiln dried sawdust bin.

Building(s): #1
#5

Item 24.2:

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

Emission Unit: 2--FORM

Emission Unit Description:

This emission unit consists of all manufacturing operations that are performed upon the previously-dried wood chips that had been produced in Emission Unit 1-DRYER. Specifically, these operations are all air/chip/pellet-entrainment ducts, the dry hammermill, the dry hammermill baghouse, the dry hammermill baghouse stack, the three pellet mills, the pellet cooler, the pellet cooler baghouse, the pellet cooler baghouse stack, the pellet packaging line, the packaging line baghouse and the packaging line baghouse stack. The outdoor fugitive PM generation (wind-blown wood dust) is also included here.

Building(s): #1

Condition 25: General Conditions - Synthetic Minor Facilities Obtaining State Facility Permits

Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR 201-5.1 (a) (1)

Item 25.1:

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

Item 25.2:

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.



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Reports due 30 days after the reporting period.
The initial report is due 1/30/2015.
Subsequent reports are due every 12 calendar month(s).

Condition 28: Visible Emissions Limited
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR 211.2

Item 28.1:

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

Condition 29: Compliance Demonstration
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR 211.2

Item 29.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 29.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility shall establish a complaint response procedure to manage complaints related to air emissions from this facility. The procedure shall be designed to ensure that complaints from officials or neighbors are adequately received and documented, and that appropriate response is taken by the facility. The facility shall:

1. Have a complaint phone line available 24 hours a day, 7 days a week.
2. Investigate any possible causes of any complaint received.
3. Take prompt action to abate any circumstance which is found to be the cause of the complaint.
4. Fully document the complaint, results of investigation, and any action taken.
5. Report in a format acceptable to the Department. In each Annual Monitoring Report, facility shall provide a list of all such compliants. If no compliants were received, this report shall denote that case as well.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2015.

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



**** Emission Unit Level ****

Condition 30: Emission Point Definition By Emission Unit
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 30.1:

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

Emission Unit: 1-DRYER

Emission Point: 00001
Height (ft.): 70 Diameter (in.): 48
NYTMN (km.): 4770.698 NYTME (km.): 490.112 Building: #1

Emission Point: 00004
Height (ft.): 22 Diameter (in.): 15
NYTMN (km.): 4770.722 NYTME (km.): 490.147 Building: #1

Emission Point: 00008
Height (ft.): 28 Length (in.): 36 Width (in.): 30
NYTMN (km.): 4770.692 NYTME (km.): 490.157 Building: #5

Emission Point: 00009
Height (ft.): 52 Length (in.): 68 Width (in.): 68
NYTMN (km.): 4770.706 NYTME (km.): 490.143 Building: #1

Item 30.2:

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

Emission Unit: 2--FORM

Emission Point: 00003
Height (ft.): 23 Diameter (in.): 20
NYTMN (km.): 4770.726 NYTME (km.): 490.147 Building: #1

Emission Point: 00006
Height (ft.): 22 Diameter (in.): 15
NYTMN (km.): 4770.711 NYTME (km.): 490.147 Building: #1

Emission Point: 00010
Height (ft.): 31 Diameter (in.): 12
NYTMN (km.): 4770.444 NYTME (km.): 490.043

Condition 31: Process Definition By Emission Unit
Effective between the dates of 04/21/2014 and 04/20/2024

Applicable State Requirement:6 NYCRR Subpart 201-5



Item 31.1:

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

Emission Unit: 1-DRYER

Process: 001

Source Classification Code: 1-03-009-03

Process Description:

Dried woodchips fuel a wood-fired furnace in order to generate a hot-exhaust energy source. Wet woodchips are conveyed into plant, resized in the green hammermill, dried (to 12% water content) in a rotary kiln drier, these dried chips are removed from airstream in a gang of six parallel cyclones and then conveyed into (for temporary storage) two outdoor silos. Airstream is induced by a blower. The maximum designed drying capacity is 15 oven-dried tons of chips per hour. Combustion exhaust & water vapor (from drying kiln) is then discharged via 70 foot stack (emission point 00001). Rooftop emission point 00009 will emit combustion-only emissions during times of start-up or during plant idling. The green hammermill exhaust air is vented through a baghouse (Source 00023) and to sidewall emission point 00004.

Emission Source/Control: 00001 - Combustion
Design Capacity: 50 million Btu per hour

Emission Source/Control: 00017 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 00023 - Control
Control Type: FABRIC FILTER

Emission Source/Control: 00003 - Process
Design Capacity: 15 tons per hour

Emission Source/Control: 00006 - Process
Design Capacity: 15 tons per hour

Emission Source/Control: 00019 - Process

Item 31.2:

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

Emission Unit: 1-DRYER

Process: 008

Source Classification Code: 3-07-008-03

Process Description:

This process consists of fugitive PM generation from outdoor conveyors, fire dump box, outdoor yard area, front loader movement and chip piles. Fines are driven by winds.



Emission Source/Control: 00021 - Process

Item 31.3:

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

Emission Unit: 1-DRYER

Process: 009

Source Classification Code: 3-07-008-03

Process Description:

This Process consists of the unloading of dry chips/sawdust into the kiln-dried receiving bin. A plastic strip curtain (Control source 00022) works to reduce the dispersion of buoyant wood dust. An air collection system and a baghouse (Control source 00020) activate while and after trucks unload, baghouse exhausts to emission point 00008. A live floor transports offloaded chips from tipping floor to a conveyor. Conveyor moves these materials into two outdoor silos (dry chip silos).

Emission Source/Control: 00020 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00022 - Control

Control Type: PARTICULATE TRAP

Emission Source/Control: 00018 - Process

Item 31.4:

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

Emission Unit: 2--FORM

Process: 007

Source Classification Code: 3-02-016-12

Process Description:

This process consists of the formation of pellets from previously kiln-dried woodchips (chips that were dried in Process 001). This process involves: 1 dry hammermill, 3 pellet mills, 1 pellet cooler, 3 cyclones (on top of cooler), 3 baghouses, air/pellet conveyance ducts, belt conveyors & augers.

Emission Source/Control: 00010 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00014 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00016 - Control

Control Type: FABRIC FILTER

Emission Source/Control: 00024 - Control

Control Type: CENTRIFUGAL

Emission Source/Control: 00025 - Control

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Control Type: CENTRIFUGAL

Emission Source/Control: 00026 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: 00004 - Process
Design Capacity: 15 tons per hour

Emission Source/Control: 00005 - Process
Design Capacity: 15 tons per hour

Emission Source/Control: 00008 - Process
Design Capacity: 15 tons per hour

Emission Source/Control: 00009 - Process
Design Capacity: 15 tons per hour