

PERMIT Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility Permit ID: 6-2320-00005/00028

Effective Date: 04/06/2022 Expiration Date: 04/05/2032

Permit Issued To:LYDALL PERFORMANCE MATERIALS (US) INC

216 WOHLSEN WAY LANCASTER, PA 17603

Contact: Andrew Uhl

LYDALL PERFORMANCE MATERIALS

215 Wohlsen Way Lancaster, PA 17603 (603) 822-1338

Facility: Lydall Performance Materials (US), Inc.

9635 MAIN ST

BEAVER FALLS, NY 13305

Contact: Andrew Uhl

LYDALL PERFORMANCE MATERIALS

215 Wohlsen Way Lancaster, PA 17603 (603) 822-1338

Description:

This Department has received a request for a permit renewal and has drafted an Article 19 (Air Pollution Control) of the Environmental Conservation Law, an Air State Facility Permit, at the facility located at 9635 Main St., Beaver Falls, NY 13305. This facility manufactures paper gaskets and specialty paperboard from fibers, fillers, binders and additives in a three step process which incorporates stock preparation, sheet formation and drying. The primary SIC code is 3053

The Department has made a tentative determination to approve the application of the Lydall Performance Materials State Facility Permit. The State Facility Permit allows the continued operations of emission units 0-00001, and 0-00002, which includes the operation a single boiler, a paper drying machine, a gasket paper curing machine, and an additive mixing vat. This permit also incorporates the existing wastewater treatement plant operations (WWTP) as emission unit 0-00003.

Division of Air Resources



Facility DEC ID: 6232000005

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:	JESSICA J HART				
	NYSDEC - REGION 6				
	317 WASHINGTON ST				
	WATERTOWN, NY 13601				
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.



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DEC GENERAL CONDITIONS

General Provisions

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- 5 3 Applications for permit renewals, modifications and transfers
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DEC GENERAL CONDITIONS **** General Provisions **** GENERAL CONDITIONS - Apply to ALL Authorized Permits.

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item3.2:

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

Item 3.3

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

Division of Air Resources



Facility DEC ID: 6232000005

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
HEADQUARTERS
Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:

NYSDEC Regional Permit Administrator Region 6 Headquarters Division of Environmental Permits State Office Building, 317 Washington Street Watertown, NY 13601-3787 (315) 785-2245



Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To:LYDALL PERFORMANCE MATERIALS (US) INC 216 WOHLSEN WAY LANCASTER, PA 17603

Facility: Lydall Performance Materials (US), Inc.

9635 MAIN ST

BEAVER FALLS, NY 13305

Authorized Activity By Standard Industrial Classification Code: 3053 - GASKETS, PACKING AND SEALING DEVICES

Permit Effective Date: 04/06/2022 Permit Expiration Date: 04/05/2032



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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

The Commissioner may seal an air contamination source to prevent its operation if compliance with 6 NYCRR Chapter III is not met within the time provided by an order of the Commissioner issued in the case of the violation. Sealing means labeling or tagging a source to notify any person that operation of the source is prohibited, and also includes physical means of preventing the operation of an air contamination source without resulting in destruction of any equipment associated with such source, and includes, but is not limited to, bolting, chaining or wiring shut control panels, apertures or conduits associated with such source.

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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



required to operate such device effectively.

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

- (a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.
- (b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial



Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit 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 between the dates of 04/06/2022 and 04/05/2032

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 between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 6 NYCRR 212-1.1 (a) (1)

Item 2.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The facility shall maintain certification of actual Volatile Organic Compound (VOC) content in all process materials to be used in 12 month VOC emission records. Certification shall take the form of written certification from the supplier to verify actual VOC content. Written certification from the supplier verifying actual VOC content must be included with each batch of product purchased.



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To demonstrate compliance with this condition certification shall include: a common material trade name, the chemical name of the product, VOC content, manufacturers name and address, emergency contact information, signature of a responsible official, and date of certification.

Certifications shall be kept on site for five years and be available for review by the Department.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 3: Compliance Demonstration

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

Effective between the dates of 04/06/2022 and 04/05/2032

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: MONITORING OF PROCESS OR CONTROL DEVICE PARAMETERS AS SURROGATE

Monitoring Description:

No facility owner or operator shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source or emission point, except for the emission of uncombined water.

Parameter Monitored: OPACITY Upper Permit Limit: 20 percent Reference Test Method: Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING

DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 4: Compliance Demonstration

Effective between the dates of 04/06/2022 and 04/05/2032

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

Item 4.1:

The Compliance Demonstration activity will be performed for the Facility.

Air Pollution Control Permit Conditions

Renewal 1



Regulated Contaminant(s):

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

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING Monitoring Description:

The control of particulate emissions released from new and modified process emission sources.

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 Subdivisions 212-2.5(a) and (b) of this Part.

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST

METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 5: Compliance Demonstration

Effective between the dates of 04/06/2022 and 04/05/2032

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

Item 5.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 5.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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



a minimum of five years.

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 2 OIL

Parameter Monitored: SULFUR CONTENT Upper Permit Limit: 0.0015 percent by weight Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY

TIME (INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 6: Compliance Demonstration

Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 6 NYCRR 226-1.3

Item 6.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 6.2:

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 or 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. Thais 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) or the vapor pressure of the solvent measured in mm Hg at 20 degrees Celsius (68 degrees Fahrenheit) as appropriate to verify compliance.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 7: Compliance Demonstration Effective between the dates of 04/06/2022 and 04/05/2032

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

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:

Operators of oil firing emission sources subject to 6 NYCRR Subpart 227-1 which do not employ a continuous opacity monitor for measuring smoke emissions, shall be required to perform the following:

- 1) Observe the stack for each emission source which is operating on oil once per day for visible emissions. This observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow).
- 2) The results of each observation must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:
 - date and time of day



- observer's name
- identity of 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 while firing oil (the firing of other fuels in between days of firing oil does not count as an interruption in the consecutive days of firing oil), then a Method 9 analysis (based upon a 6-minute mean) of the affected emission point(s) must be conducted within two (2) business days of such occurrence. The results of the Method 9 analysis must be recorded in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing the Method 9 analysis if the opacity standard is contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 8: Compliance Demonstration

Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 40CFR 63.11201(b), Subpart JJJJJJ

Item 8.1:

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

Emission Unit: 0-00001



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Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an existing coal-fired boiler with heat input capacity of less than 10 MMBtu/hr that do not meet the definition of limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio, existing oil-fired boiler with heat input capacity greater than 5 MMBtu/hr that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio, or existing biomass-fired boiler that do not meet the definition of seasonal boiler or limited-use boiler, or use an oxygen trim system that maintains an optimum air-to-fuel ratio must conduct an initial tune-up as specified in 40 CFR 63.11214, and conduct a tune-up of the boiler biennially as specified in 40 CFR 63.11223

Monitoring Frequency: EVERY TWO YEARS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2022.

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

Condition 9: Good air pollution control practices

Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 40CFR 63.11205(a), Subpart JJJJJJ

Item 9.1:

At all times the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

Condition 10: Compliance Demonstration Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 40CFR 63.11223(b), Subpart JJJJJJ

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.



Item 10.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Except as specified in 40 CFR 63.11223(c) through (f), the owner or operator of an industrial, commercial, or institutional boiler must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in paragraphs (1) through (7). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.

- (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the owner or operator may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
- (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available.
- (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the owner or operator may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
- (4) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.
- (5) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.



- (6) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (i) through (iii).
- (i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
- (ii) A description of any corrective actions taken as a part of the tune-up of the boiler.
- (iii) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
- (7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2022.

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

Condition 11: Compliance Demonstration Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 40CFR 63.11225(c), Subpart JJJJJJ

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator of an industrial, commercial, or institutional boiler must maintain the records specified in paragraphs (1) through (6).

(1) As required in 40 CFR 63.10(b)(2)(xiv), the owner or operator must keep a copy of each notification and report that he/she submitted to comply with subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that he/she



submitted.

- (2) The owner or operator must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as specified in paragraphs (i) through (iii).
- (i) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
- (ii) For each boiler required to conduct an energy assessment, the owner or operator must keep a copy of the energy assessment report.
- (iii) For each boiler subject to an emission limit in Table 1 to subpart JJJJJJ, the owner or operator must also keep records of monthly fuel use by each boiler, including the type(s) of fuel and amount(s) used. For each new oil-fired boiler that meets the requirements of 40 CFR 63.11210(e) or (f), the owner or operator must keep records, on a monthly basis, of the type of fuel combusted.
- (3) For sources that demonstrate compliance through fuel analysis, a copy of all calculations and supporting documentation that were done to demonstrate compliance with the mercury emission limits. Supporting documentation should include results of any fuel analyses. The owner or operator can use the results from one fuel analysis for multiple boilers provided they are all burning the same fuel type.
- (4) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
- (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- (6) The owner or operator must keep the records of all inspection and monitoring data required by 40 CFR 63.11221 and 63.11222, and the information identified in paragraphs (i) through (vi) for each required inspection or monitoring.



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- (i) The date, place, and time of the monitoring event.
- (ii) Person conducting the monitoring.
- (iii) Technique or method used.
- (iv) Operating conditions during the activity.
- (v) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
- (vi) Maintenance or corrective action taken (if applicable).

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

Condition 12: Applicability

Effective between the dates of 04/06/2022 and 04/05/2032

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.

**** Emission Unit Level ****

Condition 13: Compliance Demonstration Effective between the dates of 04/06/2022 and 04/05/2032

Applicable Federal Requirement: 40CFR 63.11225(b), Subpart JJJJJJ

Item 13.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Item 13.2:

Compliance Demonstration shall include the following monitoring:



Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

The owner or operator must prepare, by March 1 of each year, and submit to the delegated authority upon request, an annual compliance certification report for the previous calendar year containing the information specified in paragraphs (1) through (4). The owner or operator must submit the report by March 15 if he/she had any instance described by paragraph (3). For boilers that are subject only to the energy assessment and/or a requirement to conduct a biennial or 5- year tune-up according to 40 CFR 63.11223(a) and not subject to emission limits or operating limits, the owner or operator may prepare only a biennial or 5-year compliance report as specified in paragraphs (1) and (2).

- (1) Company name and address.
- (2) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of subpart JJJJJJ. The owner's or operator's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
- (i) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler."
- (ii) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
- (iii) "This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
- (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- (4) The total fuel use by each affected boiler subject to



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an emission limit, for each calendar month within the reporting period, including, but not limited to, a description of the fuel, whether the fuel has received a non-waste determination by you or EPA through a petition process to be a non-waste under 40 CFR 241.3(c), whether the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and the total fuel usage amount with units of measure.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



STATE ONLY ENFORCEABLE CONDITIONS **** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

- (a) The affirmative defense of emergency shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (1) an emergency occurred and that the facility owner or operator can identify the cause(s) of the emergency;
- (2) the equipment at the facility was being properly operated and maintained;
- (3) during the period of the emergency the facility owner or operator took all reasonable steps to minimize the levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) the facility owner or operator notified the department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- (b) In any enforcement proceeding, the facility owner or operator seeking to establish the occurrence of an emergency has the burden of proof.
- (c) This provision is in addition to any emergency or malfunction provision contained in any applicable requirement.

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

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



with 6 NYCRR Part 616 - Public Access to Records. 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 14: Contaminant List

Effective between the dates of 04/06/2022 and 04/05/2032

Applicable State Requirement: ECL 19-0301

Item 14.1:

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: 0NY075-00-5

Name: PM-10

CAS No: 0NY998-00-0

Name: VOC



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Condition 15: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 04/06/2022 and 04/05/2032

Applicable State Requirement: 6 NYCRR 201-1.4

Item 15.1:

- (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 16: Emission Unit Definition
Effective between the dates of 04/06/2022 and 04/05/2032

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 16.1:



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

Emission Unit: 0-00001 Emission Unit Description:

This emission unit consists of a single 32 mmbtu/hr Cleaver Brooks #2 oil fired boiler.

Building(s): BOILER RM

Item 16.2:

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

Emission Unit: 0-00002 Emission Unit Description:

This emission unit consists of a 3- step process incorporating stock preparation, sheet formation, and drying.

Building(s): BLDG2

BLDG3 BOILER RM

Item 16.3:

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

Emission Unit: 0-00003 Emission Unit Description:

This emission unit is the facility's onsite wastewater treatement operations.

Building(s): BLDG 12 BLDG 13

Condition 17: Renewal deadlines for state facility permits
Effective between the dates of 04/06/2022 and 04/05/2032

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

Item 17.1:

The owner or operator of a facility having an issued state facility permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Condition 18: Compliance Demonstration

Effective between the dates of 04/06/2022 and 04/05/2032

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

Item 18 1

The Compliance Demonstration activity will be performed for the Facility.

Item 18.2:

Compliance Demonstration shall include the following monitoring:



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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES Monitoring Description:

Any reports or submissions required by this permit shall be submitted to the Regional Air Pollution Control Engineer (RAPCE) at the following address:

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

Reporting Requirements: ANNUALLY (CALENDAR) Reports due 30 days after the reporting period. The initial report is due 1/30/2023. Subsequent reports are due every 12 calendar month(s).

Condition 19: Air pollution prohibited
Effective between the dates of 04/06/2022 and 04/05/2032

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.

Condition 20: Compliance Demonstration
Effective between the dates of 04/06/2022 and 04/05/2032

Applicable State Requirement: 6 NYCRR 212-2.1

Item 20.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 000050-00-0 FORMALDEHYDE

Item 20.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Facility owner shall monitor emissions of formaldehyde from the facility. Formaldehyde emissions may be limited

Air Pollution Control Permit Conditions
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to 100 pounds per year based on the tracking of process material thruput. Facility owner must maintain records that verify the facility's monthly formaldehyde emissions.

Formaldehyde is considered a High Toxicity Air Contaminant (HTAC), therefore the facility owner or operator shall either limit the actual annual emissions from all process operations at the facility so as to not exceed the mass emission limit of 100 pounds per year or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b). Formaldehyde is considered an 'A' rated environmental contaminant when considering the degree of air cleaning required for non-criteria air contaminants.

To determine compliance with this condition the facility shall determine material usage on a monthly basis, and using emission factors for each material, determine air formaldehyde emissions on a twelve month rolling total. These records must be maintained at the facility for a period of five years.

Any noncompliance with the HAP emission limit in this condition must be reported by sending a copy of such record to the NYSDEC, Region 6, within 30 days of the occurrence.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: MATERIAL Upper Permit Limit: 100 pounds Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL TOTAL ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2023.

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

**** Emission Unit Level ****

Condition 21: Emission Point Definition By Emission Unit Effective between the dates of 04/06/2022 and 04/05/2032

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 21.1:

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

Emission Unit: 0-00001



Emission Point: 00011

Height (ft.): 40 Diameter (in.): 22

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BOILER RM

Item 21.2:

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

Emission Unit: 0-00002

Emission Point: 00002

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00003

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00004

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00005

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00006

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00007

Height (ft.): 34 Diameter (in.): 18

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2

Emission Point: 00008

Height (ft.): 49 Diameter (in.): 26

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG3

Emission Point: 00009

Height (ft.): 49 Diameter (in.): 26

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG3

Emission Point: 00010

Height (ft.): 26 Diameter (in.): 32

NYTMN (km.): 4859.399 NYTME (km.): 464.969 Building: BLDG2



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