

Facility DEC ID: 640400006

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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
 Permit ID: 6-4040-00006/00015
 Effective Date: _____ Expiration Date: _____

Permit Issued To: Dunn Paper - Natural Dam LLC
 4921 ST RTE 58
 Gouverneur, NY 13642

Contact: Marco L'Italien
 DUNN PAPER
 4921 ST RTE 58
 Gouverneur, NY 13642
 (810) 841-1411

Facility: DUNN PAPER - NATURAL DAM
 4921 ST RTE 58N - W OF GOUVERNEUR|OSWEGATCHIE RIVER
 GOUVERNEUR, NY 13642

Contact: Jamie L Harper
 Environmental H&S Manager
 4921 ST RTE 58
 Gouverneur, NY 13642

Description:
 This Department has prepared a draft permit and has made a tentative determination, subject to public comment or other information, to issue an Air State Facility (ASF) permit pursuant to Article 19 (Air Pollution Control) of the Environmental Conservation Law for the Dunn Paper - Natural Dam facility located at 4921 State Route 58N, Town of Gouverneur, St. Lawrence County, New York. This facility is engaged in the manufacture of various types of specialty papers from fiber pulp and converted paper products. The Standard Industrial Classification representative of this facility is 2621, Paper Mills Excluding Building Paper.

Pursuant to the requirements of Section 7(2) of the Climate Leadership and Community Protection Act (CLCPA), this Department has requested and received information regarding the project's consistency with the CLCPA.

This permit allows for the operation of two (2) natural gas boilers and (2) paper machine dryers. The facility consists of two Emission Units. Emission Unit 0-00001 consists of the two boilers, fired exclusively with natural gas and the two paper machine dryers. Emission Unit 0-00003 consists of the sidewall and roof vents. The facility has potential-to-emit levels below the major source thresholds, so the caps on Sulfur Dioxide, Oxides of Nitrogen, and Carbon Dioxide Equivalents are removed.

The facility utilizes two boilers that exclusively fire natural gas that are subject to 40 CFR 60 Subpart Dc. The paper operations are subject to the requirements of 6 NYCRR Part 212. The facility is also subject to 6 NYCRR Part 226.

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The draft permit with conditions is available for review in the Region 6 NYSDEC office in Watertown, NY.

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: MIRANDA M GILGORE
 NYSDEC - REGION 6
 317 WASHINGTON ST
 WATERTOWN, NY 13601

Authorized Signature: _____ Date: ___ / ___ / _____

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Notification of Other State Permittee Obligations

Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the compliance permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in any compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

Item B: Permittee's Contractors to Comply with Permit

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

Item C: Permittee Responsible for Obtaining Other Required Permits

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

Item D: No Right to Trespass or Interfere with Riparian Rights

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

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

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

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

Item 1.1:

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

Item 1.2:

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

Item 1.3:

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

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

Item 2.1:

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

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

Item 3.1:

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

Item 3.2:

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

Item 3.3

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

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

Item 4.1:

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

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

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

Condition 5: Submission of application for permit modification or renewal-REGION 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

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Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: Dunn Paper - Natural Dam LLC
4921 ST RTE 58
Gouverneur, NY 13642

Facility: DUNN PAPER - NATURAL DAM
4921 ST RTE 58N - W OF GOUVENEUR|OSWEGATCHIE RIVER
GOUVERNEUR, NY 13642

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

Permit Effective Date:

Permit Expiration Date:

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- 7 3 6 NYCRR 202-1.1: Compliance Demonstration
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- 15 13 40CFR 60.48c(a), NSPS Subpart Dc: Compliance Demonstration
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EU=0-00001

- 16 15 6 NYCRR 212-1.1 (a) (1): Applicability - Issuance of new or modified permit or Registration
- 16 16 40CFR 60.40c, NSPS Subpart Dc: Applicability of this Subpart to this emission source
- 17 17 40CFR 60.48c(e)(1), NSPS Subpart Dc: Compliance Demonstration

EU=0-00001,EP=00002,Proc=003

- 17 18 6 NYCRR 212-1.7 (a): Compliance Demonstration
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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 2/DRAFT

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

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required to operate such device effectively.

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

(a) Except as otherwise provided by this Part, construction or operation of a new, modified or existing air contamination source without a registration or permit issued pursuant to this Part is prohibited.

(b) If an existing facility or emission source was subject to the permitting requirements of this Part at the time of construction or modification, and the owner or operator failed to apply for a permit or registration as described in this Part, the owner or operator must apply for a permit or registration in accordance with the provisions of this Part. The facility or emission source is subject to all regulations that were applicable to it at the time of construction or modification and any subsequent requirements applicable to existing emission sources.

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial

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Activities - 6 NYCRR 201-3.3 (a)

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

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All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

FEDERAL APPLICABLE REQUIREMENTS
The following conditions are federally enforceable.

Condition 1: Exempt Sources - Proof of Eligibility
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-3.2 (a)

Item 1.1:

The owner or operator of an emission source or activity that is listed as being exempt may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all records necessary for demonstrating compliance with this Subpart on-site for a period of five years, and make them available to representatives of the department upon request.

Condition 2: Trivial Sources - Proof of Eligibility
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 201-3.3 (a)

Item 2.1:

The owner or operator of an emission source or activity that is listed as being trivial in this Section may be required to certify that it is operated within the specific criteria described in this Subpart. The owner or operator of any such emission source or activity must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request.

Condition 3: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 3.1:

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

- Emission Unit: 0-00001 Emission Point: 00004
- Emission Unit: 0-00001 Emission Point: 00007

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Regulated Contaminant(s):
CAS No: 0NY210-00-0 OXIDES OF NITROGEN

Item 3.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility-wide emissions of Oxides of Nitrogen shall be verified.

To verify the emissions of this regulated contaminant, the facility shall conduct intermittent emission testing within 180 days of issuance of the permit, and as further required in this condition. If the emissions are greater than the upper limit, the facility will redo the calculations and make any modifications to the permit necessary, and the facility will provide notification of the steps that will be taken to achieve compliance within 30 days of receiving the results of the testing.

The required testing will be in compliance with Subpart 202-1 of this Title and submitted as required.

Notify the Department, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to conduct emission testing including sampling and analytical procedures.

Upper Permit Limit: 198,000 pounds per year
Reference Test Method: Method 7E
Monitoring Frequency: ONCE EVERY TEN YEARS
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

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

Applicable Federal Requirement:6 NYCRR 202-1.1

Item 4.1:

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

- Emission Unit: 0-00001 Emission Point: 00002
- Emission Unit: 0-00001 Emission Point: 00003
- Emission Unit: 0-00001 Emission Point: 00004

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Emission Unit: 0-00001

Emission Point: 00007

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 4.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The facility-wide emissions of Volatile Organic Compounds (VOC) shall be verified.

To verify the emissions of this regulated contaminant, the facility shall conduct intermittent emission testing within 180 days of issuance of the permit, and as further required in this condition. If the emissions are greater than the upper permit limit, the facility will redo the calculations and make any modifications to the permit necessary, and the facility will provide notification of the steps that will be taken to achieve compliance within 30 days of receiving the results of the testing.

The required testing will be in compliance with Subpart 202-1 of this Title and submitted as required.

Notify the Department, in writing, not less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to conduct emission testing including sampling and analytical procedures.

Upper Permit Limit: 98,000 pounds per year

Reference Test Method: Method 18

Monitoring Frequency: ONCE EVERY TEN YEARS

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 5: Visible Emissions Limited
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 211.2

Item 5.1:

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

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Condition 6: Compliance Demonstration
Effective for entire length of Permit

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

Item 6.1:

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

- Emission Unit: 0-00001 Emission Point: 00002
- Emission Unit: 0-00001 Emission Point: 00003

Item 6.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

No person shall cause or allow emissions having an average opacity during any six consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water. The Department reserves the right to perform or require the performance of an EPA Reference Test Method 9 opacity evaluation at any time during facility operation.

The facility owner or operator shall conduct a visible emissions observation of all emission points specified by this condition once per day while the process is in operation. The facility owner or operator will investigate, in a timely manner, any instance where there is cause to believe that visible emissions have the potential to exceed the opacity standard specified below.

The facility owner or operator shall investigate the cause, make any necessary corrections, and verify that the excess visible emissions problem has been corrected. If visible emissions with the potential to exceed the limit specified (except the emission of uncombined water) are observed for three consecutive operating days from the same emission point, the facility owner or operator will notify the Department of the observations within one business day. The facility owner or operator will also perform an EPA Reference Test Method 9 opacity evaluation analysis of the affected emission point and submit the results to the Department.

Daily records of the visible emissions observations, any follow-up Method 9 observations, investigations, and corrective actions taken are to be maintained on site for

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a period of at least five years from the date of the record. Such records shall include the date and time of each observation, weather conditions, results of the observation, corrective actions taken, and explanations for days when weather conditions were prohibitive.

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

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: EPA Reference Test Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

Condition 7: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement: 6 NYCRR 212-1.7 (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:

The facility shall conduct site specific intermittent emission testing to evaluate emissions of air contaminants from process emission sources. If emission testing results are higher than emission rates used in the Modeling Report dated February 29, 2024 for the ASF Renewal 2 application, the once per term modeling submitted for this permit renewal shall be revised using the Department approved model AERMOD to reflect measured values as determined by the emission testing to verify compliance with AGC and SGC values and any applicable requirements.

If revised modeling is necessary, a modeling protocol shall be submitted to the Department no more than 30 days after emission testing results. A modeling report shall be submitted no more than 60 days after the modeling protocol is approved by the Department.

Reference Test Method: AERMOD
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

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Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

Applicable Federal Requirement: 6 NYCRR 226-1.3

Item 8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
Monitoring Description:

Owners or operators conducting solvent cleaning processes must:

- (a) store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere;
- (b) maintain equipment to minimize leaks and fugitive emissions;
- (c) display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs;
- (d) keep the degreaser cover closed except when parts are being placed into or being removed from the degreaser, the cover needs to be open in order to remove solvent from the degreaser, no solvent is in the degreaser, or manually cleaning parts in a cold cleaning degreaser;
- (e) create and maintain a record of solvent consumption for five years. This record must be retained for five years and made available to the department upon request;
- (f) not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser; and
- (g) if using a cold cleaning degreaser that is subject to paragraph 6 NYCRR 226-1.4(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, bill of sale, a certificate covering multiple sales, manufacturers published information, or other appropriate documentation acceptable to the Department may be used to comply with this requirement:
 - (1) name and address of the solvent supplier;
 - (2) the type of solvent including the product or vendor identification number; and
 - (3) the VOC content of the cleaning solution in grams per

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liter (gm/l) to verify compliance.

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

Condition 9: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 226-1.4 (a)

Item 9.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The following Control requirements must be used by an owner or operator conducting solvent cleaning, if the internal volume of the machine is greater than two gallons:

- (1) a cover which can be easily operated and
- (2) an internal drainage facility (under cover), if practical,
- (3) cleaning solution with a maximum VOC content of 25 grams per liter at 20 degrees Celsius must be used.

This condition does not apply to degreasers as specified in subparagraphs 226-1.4(a)(4)(i)-(iii).

Parameter Monitored: VOC CONTENT
Upper Permit Limit: 25 grams per liter
Reporting Requirements: ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
Subsequent reports are due every 12 calendar month(s).

Condition 10: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 226-1.4 (a) (3)

Item 10.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 10.2:

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Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The owner or operator of a cold cleaning degreasing machine with an internal volume greater than two gallons must implement 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 condition does not apply to remote reservoir degreasers.

Parameter Monitored: FREEBOARD RATIO

Lower Permit Limit: 0.5 freeboard ratio

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 11: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 226-1.5 (a)

Item 11.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 11.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC
OPERATIONS

Monitoring Description:

For cold cleaning degreasing, the clean parts shall be drained at least 15 seconds or until dripping ceases.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: DEGREASING UNITS

Parameter Monitored: DURATION

Lower Permit Limit: 15 seconds

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

Condition 12: Compliance Demonstration
Effective for entire length of Permit

Applicable Federal Requirement:6 NYCRR 226-2.4 (b)

Item 12.1:

The Compliance Demonstration activity will be performed for the Facility.

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Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a facility must retain a record of the quantity and type of industrial cleaning solvents used at the facility. This record must be maintained for a period of five years and be provided to the department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a material safety data sheet, or other documentation suitable for establishing compliance, acceptable to the department, may be used to comply with this requirement.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

**Condition 13: Compliance Demonstration
Effective for entire length of Permit**

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

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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fired.

Monitoring Frequency: SINGLE OCCURRENCE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
Effective for entire length of Permit

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

Item 14.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 14.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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

Condition 15: Applicability - Issuance of new or modified permit or Registration
Effective for entire length of Permit

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

Item 15.1:

This Condition applies to Emission Unit: 0-00001

Item 15.2:

Part 212 applies to process emission sources and/or emission points associated with a process operation, unless excepted from the provision of this Part pursuant to Section 212-1.4 of this Subpart:

(1) upon issuance of a new or modified permit or registration for a facility containing process emission sources and/or emission points.

Condition 16: Applicability of this Subpart to this emission source
Effective for entire length of Permit

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Applicable Federal Requirement:40CFR 60.40c, NSPS Subpart Dc

Item 16.1:

This Condition applies to Emission Unit: 0-00001

Item 16.2:

This emission source is subject to the applicable General Provisions of 40 CFR 60 Subpart Dc. The facility owner is responsible for reviewing these general provisions in detail and complying with all applicable technical, administrative and reporting requirements.

**Condition 17: Compliance Demonstration
Effective for entire length of Permit**

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

Item 17.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 17.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of each affected facility subject to the SO₂ emission limits, fuel oil sulfur limits, or percent reduction requirements under §60.42c shall keep records as required under §60.48c(d) including the following information.

Calendar dates covered in the reporting period.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 18: Compliance Demonstration
Effective for entire length of Permit**

Applicable Federal Requirement:6 NYCRR 212-1.7 (a)

Item 18.1:

The Compliance Demonstration activity will be performed for:

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Facility DEC ID: 640400006

Emission Unit: 0-00001
 Process: 003

Emission Point: 00002

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

Item 18.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of air contaminants from process emission sources shall be verified for compliance with Part 212. To verify emissions of air contaminants from process emissions sources, the facility shall conduct intermittent emission testing within 180 days of issuance of the permit. Part 212 applies to process emission sources 00007 and 00008 and emission points 00002 and 00003 at the facility.

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point are restricted as follows:

(a) For an air contaminant listed in section 212-2.2 table 2 – high toxicity air contaminant list, of this Subpart, 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 listed for the individual HTAC; or demonstrate compliance with the air cleaning requirements for the HTAC as specified in subdivision 212-2.3(b), table 4 – degree of air cleaning required for non-criteria air contaminants, of this Subpart for the environmental rating assigned to the contaminant by the Department.

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

The facility shall conduct intermittent emission testing on one paper machine emission point (EP 00002) for Volatile Organic Compounds (VOC) emissions. VOC emissions will be measured using United States Environmental Protection Agency (USEPA) Reference Method 18. The results of the intermittent emission testing will be used to

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estimate maximum hourly emissions of speciated air contaminants.

The required testing will be in compliance with Subpart 202-1 of this Title and submitted as required.

The facility shall notify the Department, in writing, no less than 30 days prior to the test, of the time and date of the test. Such notification shall also include the acceptable procedures to be used to conduct emission testing including sampling and analytical procedures.

Upper Permit Limit: 98,000 pounds per year

Reference Test Method: Method 18

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

**Condition 19: Compliance Demonstration
Effective for entire length of Permit**

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

Item 19.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001
Process: 003

Emission Point: 00002

Item 19.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of air contaminants assigned an environmental rating, and emission rate limits under Part 212-2.3(b). This condition is applicable to all air contaminants emitted from process sources subject to Part 212. This condition applies to non-criteria air contaminants. The emission rate potential of any A-rated air contaminant shall not exceed 0.1 pound per hour. The emission rate potential of any B or C rated air contaminant shall not exceed 10.0 pounds per hour.

For this facility, A-rated contaminants are those air contaminants listed with a "high" toxicity in the Department's most recent DAR-1 guidance document, and any other air contaminant that may be A-rated by the Department. All other air contaminants are B-rated, unless otherwise rated by the Department.

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The following shall not have an emission rate that results in predicted ambient concentrations in excess of the Annual Guideline Concentration or the Short-term Guideline Concentration for each air contaminant, as determined pursuant to conditions in this permit:

- 1) air contaminants rated A with an emission rate potential less than 0.1 pound per hour and
- 2) air contaminants rated B with an emission rate potential less than 10.0 pounds per hour.

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

Condition 20: Compliance Demonstration
Effective for entire length of Permit

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

Item 20.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: 0-00001 Emission Point: 00003
Process: 003

Item 20.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emissions of air contaminants assigned an environmental rating, and emission rate limits under Part 212-2.3(b). This condition is applicable to all air contaminants emitted from process sources subject to Part 212. This condition applies to non-criteria air contaminants. The emission rate potential of any A-rated air contaminant shall not exceed 0.1 pound per hour. The emission rate potential of any B or C rated air contaminant shall not exceed 10.0 pounds per hour.

For this facility, A-rated contaminants are those air contaminants listed with a "high" toxicity in the Department's most recent DAR-1 guidance document, and any other air contaminants that may be A-rated by the Department. All other air contaminants are B-rated, unless otherwise rated by the Department.

The following shall not have an emission rate that results in predicted ambient concentrations in excess of the Annual Guideline Concentration or the Short-term Guideline Concentration for each air contaminant, as determined

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pursuant to conditions in this permit:

- 1) air contaminants rated A with an emission rate potential less than 0.1 pound per hour and
- 2) air contaminants rated B with an emission rate potential less than 10.0 pounds per hour.

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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

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STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

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

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

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

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

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

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

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

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state only enforceable.

Condition 21: Contaminant List
Effective for entire length of Permit

Applicable State Requirement:ECL 19-0301

Item 21.1:

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

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

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

CAS No: 0NY998-00-0
Name: VOC

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Condition 22: Malfunctions and Start-up/Shutdown Activities
Effective for entire length of Permit**Applicable State Requirement:6 NYCRR 201-1.4****Item 22.1:**

(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 23: Emission Unit Definition
Effective for entire length of Permit**Applicable State Requirement:6 NYCRR Subpart 201-5****Item 23.1:**

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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 the operation of facility boilers (boiler #6, boiler #7) which are identified as emission sources (ES) 00003 and 00004, and the paper machine dryers (ES 00007 and 00008). This equipment runs on natural gas.

Building(s): 1

Item 23.2:

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

Emission Unit: 0-00003

Emission Unit Description:

Paper mill sidewall and roof vents that allow the conditioning of general room air and may emit emissions from the paper manufacturing process.

Building(s): 1

**Condition 24: Compliance Demonstration
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 24.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Facility-wide emissions of Oxides of Nitrogen (NOx) in pounds per year from the facility shall be verified for any consecutive 12-month period. Reports shall include the facility-wide emissions of NOx in pounds per year from the facility for any consecutive 12-month period. Reports shall include the calculations for the facility-wide emissions of NOx. The following formula can be used to determine facility-wide emissions of NOx:

$(100 \text{ pounds NOX/MMscf of natural gas}) * (\text{number of MMscf of natural gas/year used in ES 00003}) + (100 \text{ pounds NOX/MMscf of natural gas}) * (\text{number of MMscf of natural gas/year used in ES 00004}) + (100 \text{ pounds NOX/MMscf of natural gas}) * (\text{number of MMscf of natural gas/year used in ES 00007}) + (100 \text{ pounds NOX/MMscf of natural gas}) * (\text{number of}$

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MMscf of natural gas/year used in ES 00008).

This formula utilizes the NO_x emission factor of 100 lb/MMscf for uncontrolled small boilers less than 100 MMBtu/hr from AP-42 1.4, "Natural Gas Combustion" 07/98, Table 1.4-1.

The calculations shall utilize emission factors based on Oxides of Nitrogen emission testing results once available. Reports shall be submitted annually, in a format acceptable to the Department.

Monitoring Frequency: MONTHLY
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

Condition 25: Compliance Demonstration
Effective for entire length of Permit

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 25.1:
 The Compliance Demonstration activity will be performed for the Facility.

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

Item 25.2:
 Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES
 Monitoring Description:

Facility-wide emissions of volatile organic compounds (VOC) in pounds per year from the facility shall be verified for any consecutive 12-month period. The facility shall maintain records that quantify the amount of each additive and dye applied and the VOC content of each additive and dye as applied. The above information shall be used to calculate the facility-wide VOC emissions during each month.

Reports shall include the facility-wide emissions of VOCs in pounds per year from the facility for any consecutive 12-month period. Reports shall include the calculations for the facility-wide emissions of VOCs.

The following formula can be used to determine facility-wide emissions of VOCs:

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(5.5 pounds VOC/MMscf of natural gas)*(number of MMscf of natural gas/year used in ES 00003) + (5.5 pounds NOX/MMscf of natural gas)*(number of MMscf of natural gas/year used in ES 00004) + (5.5 pounds NOX/MMscf of natural gas)*(number of MMscf of natural gas/year used in ES 00007) + (5.5 pounds NOX/MMscf of natural gas)*(number of MMscf of natural gas/year used in ES 00008) + (mass fraction of VOC in chemical additive or dye * average actual annual usage in ES 00007) + (mass fraction of VOC in chemical additive or dye * average actual annual usage in ES 00008) + (average actual annual usage of industrial cleaning solvent used * mass fraction of VOC of industrial cleaning solvent used).

This formula utilizes the VOC emission factor of 5.5 lb/MMscf from AP-42 1.4, "Natural Gas Combustion" 07/98, Table 1.4-2. This formula also assumes VOCs present in chemical additives, dyes, and industrial cleaning solvents volatilize in their entirety.

Calculations shall utilize emission factors based on VOC emission testing once available. Reports shall be submitted annually, in a format acceptable to the Department.

Monitoring Frequency: MONTHLY
 Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 Subsequent reports are due every 12 calendar month(s).

**Condition 26: Renewal deadlines for state facility permits
 Effective for entire length of Permit**

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

Item 26.1:

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

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

Item 27.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 27.2:

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Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

**Condition 28: Air pollution prohibited
Effective for entire length of Permit**

Applicable State Requirement:6 NYCRR 211.1

Item 28.1:

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

Applicable State Requirement:6 NYCRR 212-2.1

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:

The facility demonstrated compliance with Part 212 for emissions of air contaminants to the outdoor atmosphere from the process emission sources from once per permit term modeling, see Modeling Report dated February 29, 2024 from ASF Renewal 2 Application. Any future change(s) to the facility may result in additional modeling or further evaluation that shall be approved by the

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Department.

The facility shall maintain records of monthly product usage to track emissions of air contaminants included in the air dispersion analysis. These records shall be maintained for five years. The facility shall submit records of monthly product usage to the Department upon request.

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

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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

**Condition 30: Emission Point Definition By Emission Unit
Effective for entire length of Permit**

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: 0-00001

Emission Point: 00002

Height (ft.): 28 Diameter (in.): 10
 NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

Emission Point: 00003

Height (ft.): 28 Diameter (in.): 10
 NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

Emission Point: 00004

Height (ft.): 90 Diameter (in.): 48
 NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

Emission Point: 00007

Height (ft.): 11 Diameter (in.): 28
 NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

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Facility DEC ID: 6404000006

Item 30.2:

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

- Emission Unit: 0-00003

- Emission Point: 00005
 - Height (ft.): 20 Diameter (in.): 45
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00006
 - Height (ft.): 20 Diameter (in.): 45
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00008
 - Height (ft.): 20 Diameter (in.): 45
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00009
 - Height (ft.): 20 Diameter (in.): 33
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00010
 - Height (ft.): 20 Diameter (in.): 33
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00011
 - Height (ft.): 18 Diameter (in.): 33
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00012
 - Height (ft.): 18 Diameter (in.): 33
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00013
 - Height (ft.): 20 Diameter (in.): 50
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00014
 - Height (ft.): 20 Diameter (in.): 39
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00015
 - Height (ft.): 18 Diameter (in.): 33
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00016
 - Height (ft.): 20 Length (in.): 276 Width (in.): 144
 - NYTMN (km.): 4909.023 NYTME (km.): 460.128 Building: 1

- Emission Point: 00017
 - Height (ft.): 20 Length (in.): 276 Width (in.): 144

Permit ID: 6-4040-00006/00015

Facility DEC ID: 640400006

NYTMN (km.): 4909.316 NYTME (km.): 459.822 Building: 1

**Condition 31: Process Definition By Emission Unit
Effective for entire length of Permit**

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: 0-00001

Process: 003

Source Classification Code: 1-02-006-02

Process Description:

Facility boilers used to produce steam for paper manufacturing and heat. Fuel for this process is natural gas.

Emission Source/Control: 00003 - Combustion

Design Capacity: 75 million Btu per hour

Emission Source/Control: 00004 - Combustion

Design Capacity: 95 million Btu per hour

Emission Source/Control: 00007 - Process

Design Capacity: 13 million Btu per hour

Emission Source/Control: 00008 - Process

Design Capacity: 12.5 million Btu per hour

Item 31.2:

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

Emission Unit: 0-00003

Process: 006

Source Classification Code: 3-07-012-01

Process Description:

Paper Mill sidewall and roof vents that allow the conditioning of general room air and may emit emissions from the paper manufacturing process.

Emission Source/Control: 00006 - Process

Design Capacity: 55 tons per day

Permit ID: 6-4040-00006/00015

Facility DEC ID: 640400006