

Facility DEC ID: 6407400033

PERMIT
Under the Environmental Conservation Law (ECL)

IDENTIFICATION INFORMATION

Permit Type: Air State Facility

Permit ID: 6-4074-00033/02001

Mod 0 Effective Date: 01/06/2026 Expiration Date: 01/05/2036

Mod 1 Effective Date: 06/04/2026 Expiration Date: 01/05/2036

Permit Issued To: TRPC POTSDAM LLC
547A Sissonville Road
POTSDAM, NY 13676

Contact: POTSDAM SPECIALTY PAPER, INC.
547A SISSONVILLE RD
POTSDAM, NY 13676
(315) 265-4000

Facility: TRPC POTSDAM LLC
547A SISSONVILLE RD
Potsdam, NY 13676

Contact: Denise Bullock
547A Sissonville Road
Potsdam, NY 13676
(315) 265-4000

Description:

The Department has prepared a draft permit and has made a tentative determination to issue, a modification of the Air State Facility permit pursuant to Article 19 (Air Pollution Control) of the Environmental Conservation Law for the TRPC Potsdam LLC facility located at 547A Sissonville Road in the town of Potsdam, located in St. Lawrence County. The facility manufactures various types of specialty paper from purchased pulp. Facility operations include boilers and a 6 ton per hour paper machine. The primary Standard Industrial Code of the facility is 2621, Paper Mills.

The facility is permitted for the operation of three emission units: O-PAPER, O-COMBS, and U-COATR. Operation of these emission units include two boilers, three pulpers, a paper machine, and two off-line paper coating machines.

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

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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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DEC GENERAL CONDITIONS

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Facility Level

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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: TRPC POTSDAM LLC
547A Sissonville Road
POTSDAM, NY 13676

Facility: TRPC POTSDAM LLC
547A SISSONVILLE RD
Potsdam, NY 13676

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

Mod 0 Permit Effective Date: 01/06/2026

Permit Expiration Date: 01/05/2036

Mod 1 Permit Effective Date: 06/04/2026

Permit Expiration Date: 01/05/2036

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FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 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,

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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: Open Fires - Prohibitions
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 6 NYCRR 215.2

Item 1.1:

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

Item 1.2

Per Section 215.3, burning in an open fire, provided it is not contrary to other law or regulation, will be allowed as follows:

- (a) On-site burning in any town with a total population less than 20,000 of downed limbs and branches (including branches with attached leaves or needles) less than six inches in diameter and eight feet in length between May 15th and the following March 15th. For the purposes of this subdivision, the total population of a town shall include the population of any village or portion thereof located within the town. However, this subdivision shall not be construed to allow burning within any village.
- (b) Barbecue grills, maple sugar arches and similar outdoor cooking devices when actually used for cooking or processing food.
- (c) Small fires used for cooking and camp fires provided that only charcoal or untreated wood is used as fuel and the fire is not left unattended until extinguished.
- (d) On-site burning of agricultural wastes as part of a valid agricultural operation on contiguous agricultural lands larger than five acres actively devoted to agricultural or horticultural use, provided such waste is actually grown or generated on those lands and such waste is capable of being fully burned within a 24-hour period.
- (e) The use of liquid petroleum fueled smudge pots to prevent frost damage to crops.
- (f) Ceremonial or celebratory bonfires where not otherwise prohibited by law, provided that only untreated wood or other agricultural products are used as fuel and the fire is not left unattended until extinguished.
- (g) Small fires that are used to dispose of a flag or religious item, and small fires or other smoke producing process where not otherwise prohibited by law that are used in connection with a religious ceremony.
- (h) Burning on an emergency basis of explosive or other dangerous or contraband materials by police or other public safety organization.
- (i) Prescribed burns performed according to Part 194 of this Title.

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(j) Fire training, including firefighting, fire rescue, and fire/arson investigation training, performed under applicable rules and guidelines of the New York State Department of State's Office of Fire Prevention and Control. For fire training performed on acquired structures, the structures must be emptied and stripped of any material that is toxic, hazardous or likely to emit toxic smoke (such as asbestos, asphalt shingles and vinyl siding or other vinyl products) prior to burning and must be at least 300 feet from other occupied structures. No more than one structure per lot or within a 300 foot radius (whichever is bigger) may be burned in a training exercise.

(k) Individual open fires as approved by the Director of the Division of Air Resources as may be required in response to an outbreak of a plant or animal disease upon request by the commissioner of the Department of Agriculture and Markets, or for the destruction of invasive plant and insect species.

(l) Individual open fires that are otherwise authorized under the environmental conservation law, or by rule or regulation of the Department.

Condition 2: Facility Permissible Emissions**Effective between the dates of 01/06/2026 and 01/05/2036****Applicable Federal Requirement: 6 NYCRR 201-7.1**

Applicaton Specific Data

Condition 3: Capping Monitoring Condition**Effective between the dates of 01/06/2026 and 01/05/2036****Applicable Federal Requirement: 6 NYCRR 201-7.1****Item 3.1:**

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

6 NYCRR Subpart 201-6

Item 3.2:

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

Item 3.3:

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

Item 3.4:

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

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period and a comparison to the threshold levels that would require compliance with an applicable requirement.

Item 3.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 3.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

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

Item 3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

PSPI will maintain actual facility-wide NO_x emissions below 95 tpy on a 12-month rolling basis. This will be demonstrated by maintaining records of fuel usage. Emission calculations will be tracked and evaluated monthly in accordance with Department approved emission factors.

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 190000 pounds per year

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 1/30/2026.

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

Condition 4: Capping Monitoring Condition

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 6 NYCRR 201-7.1**Item 4.1:**

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

6 NYCRR Subpart 201-6

Item 4.2:

Operation of this facility shall take place in accordance with the approved criteria, emission

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limits, terms, conditions and standards in this permit.

Item 4.3:

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

Item 4.4:

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

Item 4.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 4.6:

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

PSPI will maintain actual facility-wide sulfur dioxide emissions below 95 tpy on a 12-month rolling basis. This will be demonstrated by maintaining records of fuel usage. Emission calculations will be tracked and evaluated monthly in accordance with emission factors and mass balance calculations determined by emission testing conducted in the past 10 years. If no such emission testing data is available, emissions calculations will be tracked and evaluated monthly in accordance with emission factors and mass balance calculations utilized in the facility's application for renewal of its Air State Facility permit, which was submitted to the Department on 10/3/2023, or other Department-approved emission factors and mass balance calculations.

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 190000 pounds per year

Permit ID: 6-4074-00033/02001

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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 1/30/2026.
 Subsequent reports are due every 12 calendar month(s).

Condition 5: Capping Monitoring Condition
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 6 NYCRR 201-7.1

Item 5.1:

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

6 NYCRR Subpart 201-6

Item 5.2:

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

Item 5.3:

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

Item 5.4:

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

Item 5.5:

The emission of pollutants that exceed the applicability thresholds for an applicable requirement, for which the facility has obtained an emissions cap, constitutes a violation of Part 201 and of the Act.

Item 5.6:

The Compliance Demonstration activity will be performed for the Facility.

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

Item 5.7:

Compliance Demonstration shall include the following monitoring:

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Capping: Yes

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

Monitoring Description:

PSPI will maintain actual facility wide VOC emissions below 48tpy on a 12 month rolling basis. This will be demonstrated by maintaining records of fuel usage, paper production and material usage. Emission calculations will be tracked and evaluated monthly in accordance with emission factors and mass balance calculations determined by emission testing conducted in the past 10 years. If no such emission testing data is available, emissions calculations will be tracked monthly in accordance with emission factors and mass balance calculations utilized in the facility's application for renewal of its Air State Facility permit, which was submitted on 10/3/2023, or other Department-approved emission factors and mass balance calculations.

Parameter Monitored: VOC

Upper Permit Limit: 96000 pounds per year

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 1/30/2026.

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

Condition 6: Visible Emissions Limited
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement:6 NYCRR 211.2

Item 6.1:

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 7: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 7.1:

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

Emission Unit: 0-PAPER

Emission Point: 00007

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Emission Unit: 0-PAPER	Emission Point: 00008
Emission Unit: 0-PAPER	Emission Point: 00009
Emission Unit: 0-PAPER	Emission Point: 00010
Emission Unit: 0-PAPER	Emission Point: 00011
Emission Unit: 0-PAPER	Emission Point: 00014
Emission Unit: 0-PAPER	Emission Point: 00015
Emission Unit: 0-PAPER	Emission Point: 00053

Item 7.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

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

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

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

3) If the operator observes any visible emissions (other than steam - see below) for two consecutive days, either a Method 9 or Method 22 analysis (based upon the source emitting the visible emissions) of the affected emission point(s) or emission source(s) must be conducted within two (2) business days of such occurrence. The results of either the Method 9 or Method 22 analysis must be recorded

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in the logbook. The operator must contact the Regional Air Pollution Control Engineer within one (1) business day of performing either the Method 9 or Method 22 analysis if the opacity standard has been contravened. Upon notification, any corrective actions or future compliance schedules shall be presented to the Department for acceptance.

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

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

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

Reference Test Method: See Monitoring Description

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 8: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 8.1:

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

Emission Unit: U-COATR

Emission Unit: U-COATR

Emission Point: 00134

Regulated Contaminant(s):

CAS No: 000050-00-0

FORMALDEHYDE

Item 8.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point for any air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List, 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 limits 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 Part for the environmental rating assigned to the contaminant by the Department.

Emissions of Formaldehyde from this facility, at the specified emission point listed in this condition, shall not exceed 48 pounds per year during any consecutive 12 month period. This limit is established with consideration of AERMOD modeling, which included operational restrictions on the facility and the environmental rating of formaldehyde.

Formaldehyde has been assigned an environmental rating of "B". This decision was made as a result of facility location, modeling concentrations, distance to discrete receptors, and good engineering judgement. The facility emission rate potential demonstrates compliance with the degree of air cleaning required as outlined in Table 4 of 6 NYCRR Part 212-2.3 (b).

The source owner shall determine compliance with this Formaldehyde limit by maintaining records of usage of coating containing formaldehyde. Emission rate calculations will be tracked and evaluated on a monthly basis in accordance with Department approved mass balance calculations.

The most recent calculated monthly Formaldehyde emissions shall be added to the previous 11 month total to calculate a 12 month rolling total. Records shall be kept on site in a form acceptable to the Department upon request. All records must be kept on site for no less than five years from the date of record. At no time during the term of this permit may this formaldehyde emission limit be exceeded.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 48 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

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The initial report is due 1/30/2026.
Subsequent reports are due every 12 calendar month(s).

Condition 9: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)**Item 9.1:**

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

Emission Unit: 0-PAPER

Emission Unit: 0-PAPER Emission Point: 00011

Regulated Contaminant(s):
CAS No: 000079-06-1 ETHYLENE CARBOXAMIDE

Item 9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point for any air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List, 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 limits 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 Part for the environmental rating assigned to the contaminant by the Department.

Emissions of ethylene carboxamide (CAS No: 000079-06-1) from this facility, at the specified emission point listed in this condition, shall not exceed 17 pounds per year during any consecutive 12 month period. This limit is established with consideration of AERMOD modeling, which included operational restrictions on the facility and the environmental rating of acrylamide.

Ethylene carboxamide has been assigned an environmental rating of "B". This decision was made as a result of facility location, modeling concentrations, distance to discrete receptors, and good engineering judgement. The facility emission rate potential demonstrates compliance

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with the degree of air cleaning required as outlined in Table 4 of 6 NYCRR Part 212-2.3 (b).

The source owner shall determine compliance with this ethylene carboxamide limit by maintaining records of usage of coating containing acrylamide or ethylene carboxamide. Emission rate calculations will be tracked and evaluated on a monthly basis in accordance with Department approved mass balance calculations.

The most recent calculated monthly ethylene carboxamide emissions shall be added to the previous 11 month total to calculate a 12 month rolling total. Records shall be kept on site in a form acceptable to the Department upon request. All records must be kept on site for no less than five years from the date of record. At no time during the term of this permit may this ethylene carboxamide emission limit be exceeded.

Parameter Monitored: ETHYLENE CARBOXAMIDE

Upper Permit Limit: 17 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

Condition 10: Compliance Demonstration

Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 10.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: U-COATR

Emission Unit: U-COATR

Emission Point: 00134

Regulated Contaminant(s):

CAS No: 000079-06-1

ETHYLENE CARBOXAMIDE

Item 10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of air contaminants to the outdoor atmosphere
from any process emission source or emission point for any

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air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List, 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 limits 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 Part for the environmental rating assigned to the contaminant by the Department.

Emissions of ethylene carboxamide (CAS No: 000079-06-1) from this facility, at the specified emission point listed in this condition, shall not exceed 8 pounds per year during any consecutive 12 month period. This limit is established with consideration of AERMOD modeling, which included operational restrictions on the facility and the environmental rating of ethylene carboxamide.

Ethylene Carboxamide has been assigned an environmental rating of "B". This decision was made as a result of facility location, modeling concentrations, distance to discrete receptors, and good engineering judgement. The facility emission rate potential demonstrates compliance with the degree of air cleaning required as outlined in Table 4 of 6 NYCRR Part 212-2.3 (b).

The source owner shall determine compliance with this ethylene carboxamide limit by maintaining records of usage of coating containing acrylamide or ethylene carboxamide. Emission rate calculations will be tracked and evaluated on a monthly basis in accordance with Department approved mass balance calculations.

The most recent calculated monthly ethylene carboxamide emissions shall be added to the previous 11 month total to calculate a 12 month rolling total. Records shall be kept on site in a form acceptable to the Department upon request. All records must be kept on site for no less than five years from the date of record. At no time during the term of this permit may this ethylene carboxamide emission limit be exceeded.

Parameter Monitored: ETHYLENE CARBOXAMIDE

Upper Permit Limit: 8 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

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Condition 11: Compliance Demonstration

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 6 NYCRR 212-2.3 (b)**Item 11.1:**

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

Emission Unit: 0-PAPER

Emission Unit: 0-PAPER

Emission Point: 00011

Regulated Contaminant(s):

CAS No: 000050-00-0

FORMALDEHYDE

Item 11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

Emissions of air contaminants to the outdoor atmosphere from any process emission source or emission point for any air contaminant listed in Section 212-2.2 Table 2 - High Toxicity Air Contaminant List, 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 limits 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 Part for the environmental rating assigned to the contaminant by the Department.

Emissions of Formaldehyde from this facility, at the specified emission point listed in this condition, shall not exceed 549 pounds per year during any consecutive 12 month period. This limit is established with consideration of AERMOD modeling, which included operational restrictions on the facility and the environmental rating of formaldehyde.

Formaldehyde has been assigned an environmental rating of "B". This decision was made as a result of facility location, modeling concentrations, distance to discrete receptors, and good engineering judgement. The facility emission rate potential demonstrates compliance with the degree of air cleaning required as outlined in Table 4 of 6 NYCRR Part 212-2.3 (b).

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The source owner shall determine compliance with this Formaldehyde limit by maintaining records of usage of coating containing formaldehyde. Emission rate calculations will be tracked and evaluated on a monthly basis in accordance with Department approved mass balance calculations.

The most recent calculated monthly Formaldehyde emissions shall be added to the previous 11 month total to calculate a 12 month rolling total. Records shall be kept on site in a form acceptable to the Department upon request. All records must be kept on site for no less than five years from the date of record. At no time during the term of this permit may this formaldehyde emission limit be exceeded.

Parameter Monitored: FORMALDEHYDE

Upper Permit Limit: 549 pounds per year

Monitoring Frequency: MONTHLY

Averaging Method: 12-MONTH TOTAL, ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2026.

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

Condition 12: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 12.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-PAPER	Emission Point: 00007
Emission Unit: 0-PAPER	Emission Point: 00008
Emission Unit: 0-PAPER	Emission Point: 00009
Emission Unit: 0-PAPER	Emission Point: 00010
Emission Unit: 0-PAPER	Emission Point: 00011
Emission Unit: 0-PAPER	Emission Point: 00014
Emission Unit: 0-PAPER	Emission Point: 00015
Emission Unit: 0-PAPER	Emission Point: 00053

Regulated Contaminant(s):

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Facility DEC ID: 6407400033

CAS No: 0NY075-00-0 PARTICULATES

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions from any process emission source for which an application was received by the department after July 1, 1973 are restricted as follows:

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

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: Arithmetic average of stack test runs

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 13: Compliance Demonstration

Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 13.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 13.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

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

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

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Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: RESIDUAL FUEL (#4, #5 AND/OR #6 FUEL OIL)
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.50 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
 TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 14: Compliance Demonstration
 Effective between the dates of 01/06/2026 and 01/05/2036

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

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: WORK PRACTICE INVOLVING SPECIFIC
 OPERATIONS

Monitoring Description:

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

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

Work Practice Type: PARAMETER OF PROCESS MATERIAL
 Process Material: DISTILLATES - NUMBER 1 AND NUMBER 2 OIL
 Parameter Monitored: SULFUR CONTENT
 Upper Permit Limit: 0.0015 percent by weight
 Monitoring Frequency: PER DELIVERY
 Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY
 TIME (INSTANTANEOUS/DISCRETE OR GRAB)
 Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 15: Compliance Demonstration
 Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 15.1:
 The Compliance Demonstration activity will be performed for the facility:
 The Compliance Demonstration applies to:

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Facility DEC ID: 6407400033

Emission Unit: 0-COMBS

Process: BRG

Emission Source: B0004

Emission Unit: 0-COMBS

Process: BRO

Emission Source: B0004

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 15.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Any owner or operator of a stationary combustion installation (excluding combustion turbines) or a group of stationary combustion installations firing oil or oil in combination with other liquid or gaseous fuels with a total maximum heat input capacity of at least 50 million BTUs per hour is required to meet the 0.10 lbs/mmbtu particulate matter standard. Compliance with this standard shall be conducted once per 10 years. If no test emission data is available from the last 10 years, then testing must be conducted within one year of the effective date of the permit.

The facility will submit a compliance test protocol for approval to the Department at least 30 days prior to emission testing. The test report will be submitted to the Department no later than 60 days after completion of the emission test. Records pertaining to this condition will maintained on site for a minimum of five years.

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: ONCE EVERY TEN YEARS

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 16: Compliance Demonstration

Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 16.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-COMBS

Process: BRG

Emission Source: B0004

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Facility DEC ID: 6407400033

Emission Unit: 0-COMBS

Process: BRO

Emission Source: B0004

Item 16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Monitoring Frequency: ANNUALLY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 17: Compliance Demonstration

Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 17.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 0-COMBS

Emission Point: 00004

Emission Unit: 0-COMBS

Emission Point: 00005

Emission Unit: 0-COMBS

Emission Point: 0A001

Item 17.2:

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

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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 18: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 18.1:

The Compliance Demonstration activity will be performed for the facility:

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Facility DEC ID: 6407400033

The Compliance Demonstration applies to:

Emission Unit: U-COATR Emission Point: 00134

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

Item 18.2:

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. Compliance will be determined by conducting daily observations of visible emissions from the emission unit, process, etc. to which this condition applies. The observation(s) must be conducted during daylight hours except during adverse weather conditions (fog, rain, or snow). Observations must be recorded in a bound logbook or other format acceptable to the Department. The following data must be recorded for each stack:

- date and time of day
- observer's name
- identity of emission point
- weather condition
- was a plume observed?

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

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

**** NOTE **** Steam plumes generally form after leaving the top of the stack (this is known as a detached plume). The distance between the stack and the beginning of the

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detached plume may vary, however, there is (normally) a distinctive distance between the plume and stack. Steam plumes are white in color and have a billowy consistency. Steam plumes dissipate within a short distance of the stack (the colder the air the longer the steam plume will last) and leave no dispersion trail downwind of the stack.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING
DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 19: Applicability

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 40 CFR 63, Subpart JJJJJ

Item 19.1:

Facilities that are area sources of HAP with industrial, commercial, or institutional boilers must comply with applicable portions of 40 CFR 63 JJJJJ.

Condition 20: Applicability

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable Federal Requirement: 40 CFR 63, Subpart ZZZZ

Item 20.1:

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

****** Emission Unit Level ********Condition 21: Compliance Demonstration**

Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 21.1:

The Compliance Demonstration activity will be performed for:

Emission Unit: U-COATR

Emission Point: 00134

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Permit ID: 6-4074-00033/02001

Facility DEC ID: 6407400033

Item 21.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The Off-Line Paper Coating Machine is a "Class D" Coating Operation, 6 NYCRR Subpart 228-1.4(d), because it is in the Paper, Film, and Foil category, not located in the New York Metropolitan area and located at a facility with PTE's greater than or equal to 10 tons of VOC per year. The facility may demonstrate compliance with Part 228 by utilizing compliant coatings. Compliant coatings for "Class D" paper coating operations are those coatings that contain no more than 0.08 kg VOC/kg coatings applied or lb VOC/lb coating applied. The VOC content limits can be met by averaging the VOC content of the materials used on a single surface coating line (daily with-in-line averaging).

PSPI will maintain the supplier/manufacturer records, records of purchase, usage or production of coating material, including solvents. PSPI will submit these records to the Department, if requested, within 90 days of receiving the request. Records pertaining to this condition will be maintained on site for a minimum of five years.

Parameter Monitored: VOC CONTENT

Upper Permit Limit: 0.08 kilograms VOC per kilogram
solids applied

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Averaging Method: AVERAGING METHOD - SEE MONITORING
DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

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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 22: Contaminant List

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement:ECL 19-0301

Item 22.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000079-06-1
Name: ETHYLENE CARBOXAMIDE

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

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

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

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

Condition 23: Malfunctions and Start-up/Shutdown Activities
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement: 6 NYCRR 201-1.4

Item 23.1:

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

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

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

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

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

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Condition 24: Emission Unit Definition

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement: 6 NYCRR Subpart 201-5

Item 24.1(From Mod 0):

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

Emission Unit: 0-COMBS

Emission Unit Description:

This emission unit consists of Boiler #1 (45.7 MMBtu/hr), Boiler #4 (111 MMBtu/hr) and the Infrared Dryer (12.6 MMBtu/hr). Boiler #1 and #4 are capable of firing both natural gas and No. 6 fuel oil. The Infrared Dryer fires natural gas exclusively. Boilers #1 and #4 will be capable of firing No. 2 and No. 4 along with No. 6 fuel oil following modifications that will not impact the rate capacity of each boiler.

Building(s): MCHRM
STEAM

Item 24.2(From Mod 0):

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

Emission Unit: 0-PAPER

Emission Unit Description:

This emission unit consists of three pulpers (primary, Broke and Hi-Lo), two vacuum pumps, a Pre-Dryer, Size Press, Infrared Dryer, and After Dryer used to produce various types of paper. The entire emission unit is subject to 6 NYCRR 212.

Building(s): BASE
BTRRM
MCHRM

Item 24.3(From Mod 0):

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

Emission Unit: U-COATR

Emission Unit Description:

This emission unit consists of the Off-Line Paper Coating Machine. The Off-Line Paper Coating Machine will have two drying sections: Dryer #1 (5.0 MMBTU/hr design heat input rate), and Dryer #2 (4.0 MMBTU/hr design heat input rate) to cure the coating materials applied to the paper sheet in the coating section. The emission unit is subject to 6 NYCRR 212.

Building(s): POT

Permit ID: 6-4074-00033/02001

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Condition 25: Renewal deadlines for state facility permits
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 25.1:

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 26: Compliance Demonstration
Effective between the dates of 01/06/2026 and 01/05/2036

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

Item 26.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 26.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

Division of Air Resources
NYS Dept. of Environmental Conservation
Region 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 1/30/2026.

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

Condition 27: Air pollution prohibited
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement:6 NYCRR 211.1

Item 27.1:

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.

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**** Emission Unit Level ****

Condition 28: Emission Point Definition By Emission Unit
Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement: 6 NYCRR Subpart 201-5**Item 28.1(From Mod 0):**

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

Emission Unit: 0-COMBS

Emission Point: 00004

Height (ft.): 70	Diameter (in.): 45	
NYTMN (km.): 4950.941	NYTME (km.): 500.209	Building: STEAM

Emission Point: 00005

Height (ft.): 33	Length (in.): 26	Width (in.): 26
NYTMN (km.): 4950.945	NYTME (km.): 500.282	Building: MCHRM

Emission Point: 0A001

Height (ft.): 135	Diameter (in.): 96	
NYTMN (km.): 4950.93	NYTME (km.): 500.23	Building: STEAM

Item 28.2(From Mod 0):

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

Emission Unit: 0-PAPER

Emission Point: 00007

Height (ft.): 29	Diameter (in.): 43	
NYTMN (km.): 4950.962	NYTME (km.): 500.262	Building: MCHRM

Emission Point: 00008

Height (ft.): 29	Diameter (in.): 43	
NYTMN (km.): 4950.964	NYTME (km.): 500.266	Building: MCHRM

Emission Point: 00009

Height (ft.): 29	Diameter (in.): 43	
NYTMN (km.): 4950.967	NYTME (km.): 500.273	Building: MCHRM

Emission Point: 00010

Height (ft.): 29	Diameter (in.): 43	
NYTMN (km.): 4950.969	NYTME (km.): 500.278	Building: MCHRM

Emission Point: 00011

Height (ft.): 115	Diameter (in.): 38	
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NYTMN (km.): 4951.155 NYTME (km.): 500.264 Building: MCHRM

Emission Point: 00014
Height (ft.): 115 Diameter (in.): 30
NYTMN (km.): 4950.936 NYTME (km.): 500.239 Building: MCHRM

Emission Point: 00015
Height (ft.): 30 Diameter (in.): 48
NYTMN (km.): 4950.979 NYTME (km.): 500.259 Building: BTRRM

Emission Point: 00053
Height (ft.): 28 Diameter (in.): 30
NYTMN (km.): 4951.001 NYTME (km.): 500.263 Building: BTRRM

Item 28.3(From Mod 0):

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

Emission Unit: U-COATR

Emission Point: 00134
Height (ft.): 35 Diameter (in.): 36
NYTMN (km.): 4951.182 NYTME (km.): 500.401 Building: POT

Condition 29: Process Definition By Emission Unit

Effective between the dates of 01/06/2026 and 01/05/2036

Applicable State Requirement:6 NYCRR Subpart 201-5**Item 29.1(From Mod 0):**

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

Emission Unit: 0-COMBS
Process: BRG Source Classification Code: 1-02-006-02
Process Description:
This is Boiler #1 and Boiler #4 firing natural gas.
Boiler #1 and Boiler #4 exhaust to EP 0A001 EP and EP
00004 respectively

Emission Source/Control: B0001 - Combustion
Design Capacity: 45.7 million Btu per hour

Emission Source/Control: B0004 - Combustion
Design Capacity: 111 million Btu per hour

Item 29.2(From Mod 0):

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

Emission Unit: 0-COMBS
Process: BRO Source Classification Code: 1-02-004-01
Process Description:
This process is Boiler #1 and Boiler #4 firing No. 6, or
No. 2 or No. 4 fuel oil. Boiler #1 and Boiler #4 exhaust

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to EP 0A001 and EP 00004 respectively

Emission Source/Control: B0001 - Combustion
Design Capacity: 45.7 million Btu per hour

Emission Source/Control: B0004 - Combustion
Design Capacity: 111 million Btu per hour

Item 29.3(From Mod 0):

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

Emission Unit: 0-COMBS
Process: IRD Source Classification Code: 1-05-001-06
Process Description:
This process is the Infrared Dryer combustion emissions from firing natural gas. The Infrared Dryer combustion emissions exhaust to EP 00005.

Emission Source/Control: IRDRY - Combustion
Design Capacity: 12.6 million Btu per hour

Item 29.4(From Mod 0):

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

Emission Unit: 0-PAPER
Process: P01 Source Classification Code: 3-07-004-01
Process Description:
This process consists of three pulpers (primary, Broke and Hi-Lo), two vacuum pumps, a Pre-Dryer, Size Press, Infrared Dryer, and After Dryer used to produce various types of paper.

Emission Source/Control: AFTDR - Process

Emission Source/Control: PREDR - Process

Emission Source/Control: PULP1 - Process

Emission Source/Control: PULP2 - Process

Emission Source/Control: PULP3 - Process

Emission Source/Control: SIZEP - Process

Emission Source/Control: VACP1 - Process

Emission Source/Control: VACP2 - Process

Item 29.5(From Mod 0):

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

Emission Unit: U-COATR

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Process: APL

Source Classification Code: 3-07-004-07

Process Description:

This process is the applicator section of the Off-Line Paper Coating Machine. Air collected from this section exhausts through the stack emission point EP 00134.

Emission Source/Control: COAT1 - Process

Design Capacity: 1,200 feet per minute

Item 29.6(From Mod 0):

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

Emission Unit: U-COATR

Process: DRY

Source Classification Code: 1-05-001-06

Process Description:

This process is combustion of natural gas in Dryer #1 and Dryer #2 in the Off-Line Paper Coating Machine. Both dryers exhaust through the stack emission point EP 00134.

Emission Source/Control: DRY01 - Process

Design Capacity: 5 million Btu per hour

Emission Source/Control: DRY02 - Process

Design Capacity: 4 million Btu per hour

Permit ID: 6-4074-00033/02001

Facility DEC ID: 6407400033