

Facility DEC ID: 6409900057

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

IDENTIFICATION INFORMATION

Permit Type: Air State Facility
Permit ID: 6-4099-00057/00002
Mod 0 Effective Date: 11/03/2014 Expiration Date: 11/02/2024
Mod 1 Effective Date: 12/13/2016 Expiration Date: 11/02/2024
Mod 2 Effective Date: 07/01/2020 Expiration Date: 11/02/2024

Permit Issued To: CURRAN RENEWABLE ENERGY LLC
20 Commerce Dr
MASSENA, NY 13662

Contact: PATRICK CURRAN
20 Commerce Dr
MASSENA, NY 13662
(315) 769-5970

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13662

Description:
This Modification #2 is being performed to bring the findings of the 9/5/2019 stack test into the existing State Facility Permit. An emission point will be eliminated and various caps will be adjusted or added to reflect the new emission rates.

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: TERRY R TYOE
NYSDEC - UTICA SUBOFFICE
207 GENESEE ST
UTICA, NY 13501-2885

Authorized Signature: _____ Date: ___ / ___ / ___

Facility DEC ID: 6409900057

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.

Facility DEC ID: 6409900057

PAGE LOCATION OF CONDITIONS

PAGE

DEC GENERAL CONDITIONS

General Provisions

- 4 1 Facility Inspection by the Department
- 4 2 Relationship of this Permit to Other Department Orders and Determinations
- 4 3 Applications for permit renewals, modifications and transfers
- 5 4 Applications for permit renewals, modifications and transfers
- 5 5 Applications for permit renewals, modifications and transfers
- 5 6 Permit modifications, suspensions or revocations by the Department

Facility Level

- 6 7 Submission of application for permit modification or renewal-REGION 6 SUBOFFICE - UTICA

Facility DEC ID: 6409900057

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 1-1: Applications for permit renewals, modifications and transfers
Applicable State Requirement: 6 NYCRR 621.11

Item 1-1.1:
 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 1-1.2:
 The permittee must submit a renewal application at least 180 days before the expiration of permits for Title V and State Facility Permits.

Item 1-1.3
 Permits are transferrable with the approval of the department unless specifically prohibited by the statute, regulation or another permit condition. Applications for permit transfer should be submitted prior to actual transfer of ownership.

Condition 2-1: Applications for permit renewals, modifications and transfers

Facility DEC ID: 6409900057

Applicable State Requirement: 6 NYCRR 621.11

Item 2-1.1:

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 2-1.2:

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

Item 2-1.3

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

Condition 3: Applications for permit renewals, modifications and transfers

Applicable State Requirement: 6 NYCRR 621.11

Item 3.1:

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

Item 3.2:

The permittee must submit a renewal application at least 180 days before expiration of permits for Title V Facility Permits, or at least 30 days before expiration of permits for State Facility Permits.

Item 3.3:

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

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

Applicable State Requirement: 6 NYCRR 621.13

Item 4.1:

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

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

Facility DEC ID: 6409900057

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

**Condition 5: Submission of application for permit modification or renewal-REGION 6
SUBOFFICE - UTICA**

Applicable State Requirement: 6 NYCRR 621.6 (a)

Item 5.1:

Submission of applications for permit modification or renewal are to be submitted to:
NYSDEC Regional Permit Administrator
Region 6 Sub-office
Division of Environmental Permits
State Office Building, 207 Genesee Street
Utica, NY 13501-2885
(315) 793-2555

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - AIR STATE FACILITY PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: CURRAN RENEWABLE ENERGY LLC
20 Commerce Dr
MASSENA, NY 13662

Facility: CURRAN RENEWABLE ENERGY LLC
20 COMMERCE DR
MASSENA, NY 13662

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

Mod 0 Permit Effective Date: 11/03/2014

Permit Expiration Date: 11/02/2024

Mod 1 Permit Effective Date: 12/13/2016

Permit Expiration Date: 11/02/2024

Mod 2 Permit Effective Date: 07/01/2020

Permit Expiration Date: 11/02/2024

PAGE LOCATION OF CONDITIONS

PAGE

FEDERALLY ENFORCEABLE CONDITIONS

Facility Level

6	1 6 NYCRR 201-3.1 (a): Exempt and Trivial Activities Applicability
6	2-1 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
7	2-2 6 NYCRR 201-6.4 (b) (1): Compliance Demonstration
8	5 6 NYCRR Subpart 201-7: Facility Permissible Emissions
9	*2-3 6 NYCRR Subpart 201-7: Capping Monitoring Condition
11	*2-4 6 NYCRR Subpart 201-7: Capping Monitoring Condition
13	*2-5 6 NYCRR Subpart 201-7: Capping Monitoring Condition
15	*2-6 6 NYCRR Subpart 201-7: Capping Monitoring Condition
17	*2-7 6 NYCRR Subpart 201-7: Capping Monitoring Condition
19	21 6 NYCRR 211.2: Visible Emissions Limited
19	2-8 6 NYCRR 211.2: Compliance Demonstration
20	2-9 6 NYCRR 212-1.5 (g): Compliance Demonstration
21	2-10 6 NYCRR 212-1.5 (g): Compliance Demonstration
23	2-11 6 NYCRR 212-1.5 (g): Compliance Demonstration
24	2-12 6 NYCRR 212-1.6 (a): Compliance Demonstration
25	2-13 6 NYCRR 212-2.4 (b): Compliance Demonstration
25	12 6 NYCRR Part 226: Compliance Demonstration
27	2-14 6 NYCRR 227-1.3 (a): Compliance Demonstration

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

30	16 ECL 19-0301: Contaminant List
31	17 6 NYCRR 201-1.4: Malfunctions and start-up/shutdown activities
32	18 6 NYCRR Subpart 201-5: Emission Unit Definition
33	19 6 NYCRR 201-5.2 (c): Renewal deadlines for state facility permits
33	2-15 6 NYCRR 201-5.3 (c): Compliance Demonstration
34	20 6 NYCRR 201-5.3 (c): Compliance Demonstration
34	8 6 NYCRR 211.1: Air pollution prohibited
34	2-16 6 NYCRR 212-2.1 (a): Compliance Demonstration

Emission Unit Level

35	23 6 NYCRR Subpart 201-5: Emission Point Definition By Emission Unit
36	24 6 NYCRR Subpart 201-5: Process Definition By Emission Unit

NOTE: * preceding the condition number indicates capping.

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

FEDERALLY ENFORCEABLE CONDITIONS

Renewal 1/Mod 2/FINAL

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Sealing - 6 NYCRR 200.5

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

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

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

Item B: Acceptable Ambient Air Quality - 6 NYCRR 200.6

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

Item C: Maintenance of Equipment - 6 NYCRR 200.7

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

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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

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

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

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

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

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

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

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

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

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

Item H: Proof of Eligibility for Sources Defined as Trivial Activities - 6 NYCRR 201-3.3 (a)

The owner and/or operator of an emission source or unit

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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

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

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

Item J: Open Fires Prohibitions - 6 NYCRR 215.2

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

Item K: Permit Exclusion - ECL 19-0305

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

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

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 and Trivial Activities Applicability
Effective between the dates of 11/03/2014 and 11/02/2024

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

Item 1.1:

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

Condition 2-1: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

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

Replaces Condition(s) 1-1

Item 2-1.1:

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

Emission Unit: 2-FORM1	Emission Point: 00006
Emission Unit: 2-FORM1 Process: 401	Emission Point: 00006 Emission Source: MILL1
Emission Unit: 2-FORM1 Process: 401	Emission Point: 00006 Emission Source: MILL2
Emission Unit: 2-FORM1 Process: 401	Emission Point: 00006 Emission Source: MILL3
Emission Unit: 2-FORM1 Process: 401	Emission Point: 00006 Emission Source: MILL4
Emission Unit: 2-FORM1 Process: 401	Emission Point: 00006 Emission Source: MILL5
Emission Unit: 2-FORM1 Process: 500	Emission Point: 00006 Emission Source: COOL9

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000107-02-8	ACROLEIN
CAS No: 000071-43-2	BENZENE

Item 2-1.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Exhaust from all pellet mills + pellet cooler, via emission point 00006:

One round (three runs) of stack tests shall be required once per each 10 year period. Air contaminants to be tested are formaldehyde, acrolein and benzene. The purpose of this testing is to create ongoing emissions data that might be used for further HTAC analysis. NYSDEC maintains the regulatory authority to require testing at any time. There are no effective testing limits. EPA Reference Tests could be a Modified RM 18 (benzene) and Carb 430 (acrolein & formaldehyde), but the choice of RM should be discussed with the stack testing firm.

Upper Permit Limit: 2.23 pounds per hour

Reference Test Method: Possible Ref Methods: Carb 430 & Modified RM 18

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 2-2: Compliance Demonstration

Effective between the dates of 07/01/2020 and 11/02/2024

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

Item 2-2.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYR1	Emission Point: 00001
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 203	Emission Source: DRYR2

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000071-43-2	BENZENE
CAS No: 000107-02-8	ACROLEIN

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

CAS No: 0NY075-00-5	PM-10
CAS No: 0NY210-00-0	OXIDES OF NITROGEN
CAS No: 0NY998-00-0	VOC
CAS No: 000630-08-0	CARBON MONOXIDE

Item 2-2.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Torbel Furnace + rotary dryer + cyclone gang, via emission point 00001:

One round (three runs) of stack testing shall be required once per each 10 year period. Torbel furnace shall be fired via SCADA system. Air contaminants to be tested are CO, NO_x, VOC, PM-10, formaldehyde, acrolein and benzene. NYSDEC maintains the regulatory authority to require testing at any time.

Testing limits are:

CO - 22.6 lb/hr
 NO_x - 22.6 lb/hr
 VOC - 11.18 lb/hr
 PM10 - 22.6 lb/hr

Any exceedences can be resolved by the capping of pellet production or by the capping of Torbel firing hours.

Upper Permit Limit: 0 pounds per hour

Reference Test Method: 25A, 10, 7E, 1 thru 5, 202 & others

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 1-HOUR AVERAGE

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 5: Facility Permissible Emissions
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Item 5.1:

The sum of emissions from the emission units specified in this permit shall not equal or exceed the following

Potential To Emit (PTE) rate for each regulated contaminant:

per year	CAS No: 000630-08-0	(From Mod 2)	PTE: 198,000 pounds
	Name: CARBON MONOXIDE		
per year	CAS No: 0NY075-00-0	(From Mod 2)	PTE: 190,000 pounds

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

	Name: PARTICULATES		
per year	CAS No: 0NY075-00-5 (From Mod 2)	PTE:	190,000 pounds
	Name: PM-10		
year	CAS No: 0NY210-00-0 (From Mod 2)	PTE:	1 pounds per
	Name: OXIDES OF NITROGEN		
per year	CAS No: 0NY998-00-0 (From Mod 2)	PTE:	98,000 pounds
	Name: VOC		

Condition 2-3: Capping Monitoring Condition
Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7

Item 2-3.1:

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 201-6.1 (a)

Item 2-3.2:

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

Item 2-3.3:

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 2-3.4:

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

Item 2-3.5:

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 2-3.6:

The Compliance Demonstration activity will be performed for the facility:

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

The Compliance Demonstration applies to:

Emission Unit: 2-FORM1 Process: 401	Emission Source: MILL1
Emission Unit: 2-FORM1 Process: 401	Emission Source: MILL2
Emission Unit: 2-FORM1 Process: 401	Emission Source: MILL3
Emission Unit: 2-FORM1 Process: 401	Emission Source: MILL4
Emission Unit: 2-FORM1 Process: 401	Emission Source: MILL5
Regulated Contaminant(s): CAS No: 0NY998-00-0	VOC

Item 2-3.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that production of manufactured pellets remain less than 140,825 tons during any consecutive 365 day period. This PELLET PRODUCTION cap is designed, in surrogate, to limit VOC emissions below the 99,000 pounds per year level. The basis of this calculated limit is the 9/5/2019 stack test of EP 00001 and EP 00006, whose combined VOC emission rate was found to be 0.703 pounds of VOC per ton of pellets produced.

RECORDS:

Facility owner must maintain records that verify the facility's monthly PELLET PRODUCTION. These records shall be maintained at the facility for a minimum period of five years. After each month's end, the 12-month roll of manufactured pellets shall be added to the form "Annual Capping Certification - for pellets"

REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's pellet production during any consecutive 365 day period was less than 140,825 tons. The annual monitoring report shall include information that documents pellet production. If requested, the report shall also include production records and any other data that had been used in calculating the monthly pellet production.

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

The form "Annual Capping Certification" is required.

HOW TO CALCULATE:

The record "12-month rolled pellet production table" is the central record that will provide inputs to the reporting for each of the other four caps (emissions caps) that are in this permit. The 9/5/2019 stack test determined that VOC was emitted at a rate of 0.703 lbs of VOC per ton of pellets produced.

NONCOMPLIANCE:

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

Parameter Monitored: PELLETS
 Upper Permit Limit: 140,825 tons per year
 Reference Test Method: Facility to maintain 12 month roll of pellets made
 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 1/30/2021.
 Subsequent reports are due every 12 calendar month(s).

Condition 2-4: Capping Monitoring Condition
Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement:6 NYCRR Subpart 201-7

Replaces Condition(s) 1-3

Item 2-4.1:

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 201-6.1 (a)

Item 2-4.2:

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

Item 2-4.3:

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 2-4.4:

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

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 2-4.5:

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 2-4.6:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2
Regulated Contaminant(s):	
CAS No: 000630-08-0	CARBON MONOXIDE

Item 2-4.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that the facility-wide emissions of carbon monoxide (CO), including those from permitted, exempt and trivial sources, remain less than 198,000 pounds during any consecutive 365 day period.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly CO emissions. These records shall be maintained at the facility for a minimum five year period. Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's CO emissions during any consecutive 365 day period were less than 198,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the CO emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and other data used in calculating the monthly CO emissions. The form "Annual Capping Certification" is required.

HOW TO CALCULATE:

A separate record "12-month rolled pellet production

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

table" is very essential and will provide inputs to reporting for each of the five caps in this permit. The 9/5/2019 stack test determined that CO was emitted at a rate of 0.52 lbs of CO per ton of pellets produced. The rate 0.52 should be multiplied by each of the 12-month rolls (of pellets) to yeild a 12-month roll of CO for each month of each year. These 12 results shall be reported on an "Annual Capping Certification - for Carbon Monoxide".

NONCOMPLIANCE:

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

Parameter Monitored: CARBON MONOXIDE

Upper Permit Limit: 198,000 pounds per year

Reference Test Method: If testing becomes required, then use RM10

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 2-5: Capping Monitoring Condition
Effective between the dates of 07/01/2020 and 11/02/2024****Applicable Federal Requirement:6 NYCRR Subpart 201-7****Item 2-5.1:**

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 201-6.1 (a)

Item 2-5.2:

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

Item 2-5.3:

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 2-5.4:

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

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 2-5.5:

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 2-5.6:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2
Regulated Contaminant(s):	
CAS No: 0NY210-00-0	OXIDES OF NITROGEN

Item 2-5.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes

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

Monitoring Description:

CAP:

Facility owner shall ensure that the facility-wide emissions of the 'oxides of nitrogen' (NOx), including those from permitted, exempt and trivial sources, remain less than 198,000 pounds during any consecutive 365 day period.

RECORDS:

Facility owner shall maintain records that verify the facility's monthly NOx emissions. These records shall be maintained at the facility for a minimum five year period. Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's NOx emissions during any consecutive 365 day period were less than 198,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the NOx emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and other data used in calculating the monthly NOx emissions. The form "Annual Capping Certification" is required.

HOW TO CALCULATE:

A separate record "12-month rolled pellet production

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

table" is very essential and will provide inputs to the reporting for each of the five caps in this permit. The 9/5/2019 stack test determined that NO_x was emitted at a rate of 0.8 lbs of NO_x per ton of pellets produced. The rate 0.8 should be multiplied by each of the 12-month rolls (of pellets) to yeild a 12-month roll of NO_x for each month of each year. These 12 results shall be reported on an "Annual Capping Certification - for NO_x".

NONCOMPLIANCE:

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

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 198,000 pounds per year

Reference Test Method: EPA Reference Method 7E

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

**Condition 2-6: Capping Monitoring Condition
Effective between the dates of 07/01/2020 and 11/02/2024****Applicable Federal Requirement:6 NYCRR Subpart 201-7****Replaces Condition(s) 1-4****Item 2-6.1:**

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 201-6.1 (a)

Item 2-6.2:

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

Item 2-6.3:

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 2-6.4:

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

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and any other data that had been used in calculating the monthly VOC emissions. The form "Annual Capping Certification" is required.

HOW TO CALCULATE:

A separate record "12-month rolled pellet production table" is very essential and will provide inputs to the reporting for each of the five caps in this permit. The 9/5/2019 stack test determined that VOC was emitted at a rate of 0.623 lbs of VOC per ton of pellets produced. The rate 0.623 should be multiplied by each of the 12-month rolls (of pellets) to yield a 12-month roll of VOC for each month of each year. These 12 results shall be reported on an "Annual Capping Certification - for VOC".

NONCOMPLIANCE:

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

Parameter Monitored: VOC

Upper Permit Limit: 99,000 pounds per year

Reference Test Method: If test is required, then use RM25A

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-7: Capping Monitoring Condition
Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement: 6 NYCRR Subpart 201-7**Item 2-7.1:**

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 201-6.1 (a)

Item 2-7.2:

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

Item 2-7.3:

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.

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 2-7.4:

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 2-7.5:

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 2-7.6:

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

Emission Unit: 1-DRYR1 Process: 201	Emission Point: 00001 Emission Source: BURN1
Emission Unit: 1-DRYR1 Process: 202	Emission Point: 00001 Emission Source: BURN2
Emission Unit: 1-DRYR1 Process: 203	Emission Point: 00001 Emission Source: DRYR2
Regulated Contaminant(s):	
CAS No: 0NY075-00-0	PARTICULATES
CAS No: 0NY075-00-5	PM-10

Item 2-7.7:

Compliance Demonstration shall include the following monitoring:

Capping: Yes
Monitoring Type: MONITORING OF PROCESS OR CONTROL
DEVICE PARAMETERS AS SURROGATE
Monitoring Description:
CAP:
Facility owner shall ensure that the facility-wide emissions of particulates and PM-10 (particulate matter that is less than 10 micrometers in diameter), including those from permitted, exempt and trivial sources, remain less than 198,000 pounds during any consecutive 365 day period.
RECORDS:
Facility owner shall maintain records that verify the facility's monthly PM-10 emissions. These records shall be maintained at the facility for a minimum five year period. Reports shall be submitted annually, in a format

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

acceptable to the Department, which document that the facility's particulate and PM-10 emissions during any consecutive 365 day period were less than 198,000 pounds.

REPORTS:

The annual monitoring report shall include information that documents the PM-10 emissions from each emission source at the facility, including exempt and trivial activities. If requested, the report shall also include all emission factors and other data used in calculating the monthly PM-10 emissions. The form "Annual Capping Certification" is required.

HOW TO CALCULATE:

A separate record "12-month rolled pellet production table" is very essential and will provide inputs to the reporting for each of the five caps in this permit. The 9/5/2019 stack test determined that PM-10 was emitted at a rate of 1.028 lbs of PM-10 per ton of pellets produced. The rate 1.028 should be multiplied by each of the 12-month rolls (of pellets) to yield a 12-month roll of PM-10 for each month of each year. These 12 results shall be reported on an "Annual Capping Certification - for PM10".

NONCOMPLIANCE:

Any noncompliance with the particulate and PM-10 emission limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 198,000 pounds per year

Reference Test Method: EPA Reference Methods 1 thru 5 + 202

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 21: Visible Emissions Limited
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 211.2**Item 21.1:**

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

Condition 2-8: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Applicable Federal Requirement:6 NYCRR 211.2

Replaces Condition(s) 22

Item 2-8.1:

The Compliance Demonstration activity will be performed for the Facility.

Item 2-8.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

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

Monitoring Frequency: DAILY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-9: Compliance Demonstration

Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement:6 NYCRR 212-1.5 (g)

Replaces Condition(s) 1-6

Item 2-9.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYR1
Process: 300

Emission Point: 00003
Emission Source: BAGH7

Emission Unit: 2-FORM1
Process: 500

Emission Point: 00006
Emission Source: BAG11

Emission Unit: 2-FORM1

Emission Point: 00004

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Process: 600

Emission Source: BAG13

Emission Unit: 2-FORM1

Emission Point: 00004

Process: 600

Emission Source: BAG14

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 2-9.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

The particulate capture efficiency of these control devices (four baghouses) shall be ensured by providing effective baghouse maintenance that is in accord with the manufacturer's specifications and/or empirical history. Baggouses shall be operated within the referenced pressure drop parameters while the associated baghouse is in operation. Manometer readings below 1" WC and above 4" WC shall require immediate root cause analysis and then followed by expedient corrective action. Manometers shall be monitored and recorded once per week and while the baghouse is in operation. Each Annual Monitoring Report shall include copies of these pressure drop log sheets. This record and all other baghouse maintenance records shall be kept for a minimum period of five years.

Parameter Monitored: PRESSURE DROP

Lower Permit Limit: 1 inches of water

Upper Permit Limit: 4 inches of water

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

Monitoring Frequency: WEEKLY

Averaging Method: RANGE-NOT TO FALL OUTSIDE OF STATED
RANGE EXCEPT DURING STARTUP/SHUTDOWN

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

Condition 2-10: Compliance Demonstration

Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement: 6 NYCRR 212-1.5 (g)

Item 2-10.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYR1

Process: 202

Emission Source: BURN2

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000071-43-2	BENZENE
CAS No: 000107-02-8	ACROLEIN
CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY998-00-0	VOC

Item 2-10.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

SOURCE:

This permit condition pertains only to the TORBEL furnace.

LIMIT:

The facility shall avoid a 100 ton/yr exceedence of the carbon monoxide by maintaining a minimum burner firing temperature of 1,680 degrees Fahrenheit while chip-drying operations are underway. Emissions of carbon monoxide, acrolein, formaldehyde and benzene are similarly contained on a surrogate basis.

RECORDS:

This firing temperature shall be monitored and logged at least once per hour. During a previous stack test, carbon monoxide and VOC emissions were shown to escalate at lower firing temperatures. Facility shall maintain ongoing readiness to demonstrate the burner firing history (via SCADA records) to the Department representative. These records shall be maintained at the facility for a minimum five year period.

REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's burner firing temperature had not fallen below 1,680 degrees Fahrenheit while chip drying was underway.

NONCOMPLIANCE:

Any noncompliance with the 1,680 degree firing temperature lower limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: TEMPERATURE

Lower Permit Limit: 1,680 degrees Fahrenheit

Monitoring Frequency: CONTINUOUS

Averaging Method: Minimum-not to fall below average parameter value determined by stack test

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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

Condition 2-11: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

Applicable Federal Requirement: 6 NYCRR 212-1.5 (g)

Replaces Condition(s) 1-5

Item 2-11.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1

Regulated Contaminant(s):

CAS No: 000071-43-2	BENZENE
CAS No: 000107-02-8	ACROLEIN
CAS No: 000630-08-0	CARBON MONOXIDE
CAS No: 0NY998-00-0	VOC
CAS No: 000050-00-0	FORMALDEHYDE

Item 2-11.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

SOURCE:

This permit condition pertains only to the ENERGY UNLIMITED furnace. Note that this furnace is not wired into the SCADA system, it manual-fires only.

LIMIT:

The facility shall avoid a 100 ton/yr exceedence of the carbon monoxide by maintaining a minimum burner firing temperature of 1,804 degrees Fahrenheit while chip-drying operations are underway. Emissions of VOC, acrolein, formaldehyde and benzene are similarly contained on a surrogate basis.

RECORDS:

This firing temperature shall be monitored and logged at least once per hour. During a previous stack test, carbon monoxide emissions were shown to escalate at lower firing temperatures. Facility shall maintain ongoing readiness to demonstrate the burner firing history (via paper records) to the Department representative. These records shall be maintained at the facility for a minimum five year period.

REPORTS:

Reports shall be submitted annually, in a format acceptable to the Department, which document that the facility's burner firing temperature had not fallen below 1,804 degrees Fahrenheit while chip drying was

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

underway.

NONCOMPLIANCE:

Any noncompliance with the 1,804 degree firing temperature lower limit in this condition shall be reported by sending a copy of such record to the NYSDEC Region 6, within 30 days of the occurrence.

Parameter Monitored: TEMPERATURE
 Lower Permit Limit: 1,804 degrees Fahrenheit
 Monitoring Frequency: Hourly when in use
 Averaging Method: MINIMUM-NOT TO FALL BELOW EXCEPT DURING STARTUP/SHUTDOWN
 Reporting Requirements: ANNUALLY (CALENDAR)
 Reports due 30 days after the reporting period.
 The initial report is due 1/30/2021.
 Subsequent reports are due every 12 calendar month(s).

Condition 2-12: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

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

Replaces Condition(s) 1-7

Item 2-12.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00002
Emission Unit: 1-DRYR1	Emission Point: 00003
Emission Unit: 2-FORM1	Emission Point: 00004
Emission Unit: 2-FORM1	Emission Point: 00006

Item 2-12.2:

Compliance Demonstration shall include the following monitoring:

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

Monitoring Description:

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

Parameter Monitored: OPACITY
 Upper Permit Limit: 20 percent
 Reference Test Method: Method 9
 Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
 Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 2-13: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

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

Replaces Condition(s) 1-8

Item 2-13.1:

The Compliance Demonstration activity will be performed for the facility:

The Compliance Demonstration applies to:

Emission Unit: 1-DRYR1 Emission Point: 00001

Emission Unit: 1-DRYR1 Emission Point: 00002

Emission Unit: 1-DRYR1 Emission Point: 00003

Emission Unit: 2-FORM1 Emission Point: 00004

Emission Unit: 2-FORM1 Emission Point: 00006

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 2-13.2:

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

Parameter Monitored: PM-10

Upper Permit Limit: 0.050 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 12: Compliance Demonstration
Effective between the dates of 11/03/2014 and 11/02/2024

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Applicable Federal Requirement: 6 NYCRR Part 226**Item 12.1:**

The Compliance Demonstration activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 0NY998-00-0 VOC

Item 12.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

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

A. Equipment Specifications

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

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

B. Operating Requirements:

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

C. General Requirements:

A Person conducting solvent metal cleaning must:

- (1) Store solvent in covered containers and transfer or dispose of waste solvent in such a manner that less than 20 percent of the waste solvent (by weight) can evaporate into the atmosphere.
- (2) Maintain equipment to minimize leaks and fugitive emissions.
- (3) Display at the equipment location a conspicuous summary of proper operating procedures consistent with minimizing emissions of VOCs.
- (4) Keep the degreaser cover closed except when:
 - (a) parts are being placed into or being removed

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

- from the degreaser;
- (b) adding or removing solvent from the degreaser;
- (c) no solvent is in the degreaser; or
- (d) when manually cleaning metal parts in the cold cleaning degreaser.
- (5) Create and retain a record of solvent consumption for five years. This record must be made available to the Department upon request.
- (6) Not clean sponges, fabric, wood, leather, paper products and other absorbent materials in a degreaser.
- (7) If using a cold cleaning degreaser that is subject to paragraph 226.3(a)(4), retain a record of the following three items for five years and provide these records to the Department upon request. An invoice, a bill of sale, a certificate covering multiple sales, a Material Safety Data Sheet (MSDS), or other appropriate documentation acceptable to the Department may be used to comply with this requirement.
 - (a) the name and address of the solvent supplier;
 - (b) the type of solvent including the product or vendor identification number; and
 - (c) the vapor pressure of the solvent measured in mm Hg at 20 °C (68 °F).

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

Condition 2-14: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

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

Replaces Condition(s) 1-9

Item 2-14.1:

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

Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 201	Emission Source: BURN1
Emission Unit: 1-DRYR1	Emission Point: 00001
Process: 202	Emission Source: BURN2

Regulated Contaminant(s):
 CAS No: 0NY075-00-5 PM-10

Item 2-14.2:

Compliance Demonstration shall include the following monitoring:

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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

Monitoring Description:

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

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

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

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

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

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: Observe plume daily, do RM 9 by NYSDEC request

Monitoring Frequency: DAILY

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2021.

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

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

Item A: Emergency Defense - 6 NYCRR 201-1.5

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

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

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

(2) The equipment at the permitted facility causing the emergency was at the time being properly operated and maintained;

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

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

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

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

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

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

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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 16: Contaminant List

Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:ECL 19-0301

Item 16.1:

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

CAS No: 000050-00-0
Name: FORMALDEHYDE

CAS No: 000071-43-2
Name: BENZENE

CAS No: 000107-02-8
Name: ACROLEIN

CAS No: 000630-08-0
Name: CARBON MONOXIDE

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

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

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

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

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

Condition 17: Malfunctions and start-up/shutdown activities
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement: 6 NYCRR 201-1.4

Item 17.1:

- (a) The facility owner or operator shall take all necessary and appropriate actions to prevent the emission of air pollutants that result in contravention of any applicable emission standard during periods of start-up, shutdown, or malfunction.
- (b) The facility owner or operator shall compile and maintain records of all equipment malfunctions, maintenance, or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the department when requested to do so, or when so required by a condition of a permit issued for the corresponding air contamination source. Such reports shall state whether any violations occurred and, if so, whether they were unavoidable, include the time, frequency and duration of the maintenance and/or start-up/shutdown activities, and an estimate of the emission rates of any air contaminants released. Such records shall be maintained for a period of at least five years and made available for review to department representatives upon request. Facility owners or operators subject to continuous stack monitoring and quarterly reporting requirements need not submit additional reports for equipment maintenance or start-up/shutdown activities for the facility to the department.
- (c) In the event that emissions of air contaminants in excess of any emission standard in this Subchapter occur due to a malfunction, the facility owner or operator shall compile and maintain records of the malfunction and notify the department as soon as possible during normal working hours, but not later than two working days after becoming aware that the malfunction occurred. When requested by the department, the facility owner or operator shall submit a written report to the department describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates.
- (d) The department may also require the owner or operator to include, in reports described under Subdivisions (b) and (c) of this Section, an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions.
- (e) A violation of any applicable emission standard resulting from start-up, shutdown, or malfunction conditions at a permitted or registered facility may not be subject to an enforcement action by the department and/or penalty if the department determines, in its sole discretion, that such a violation was unavoidable. The actions and recordkeeping and reporting requirements listed above must be adhered to in such circumstances.

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Condition 18: Emission Unit Definition
Effective between the dates of 11/03/2014 and 11/02/2024**Applicable State Requirement:6 NYCRR Subpart 201-5****Item 18.1(From Mod 2):**

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

Emission Unit: 1-DRYR1

Emission Unit Description:

This emission unit consists of all initial pellet manufacturing operations up to and including the storing of dried wood meal. This EU includes the operations of the wet hammermill and its cyclone. This EU encompasses the firing of EITHER of two wood-fired furnaces. The firing of BOTH furnaces concurrently is NOT permitted except in the case where one furnace is throttling down as it is handing-off the drying task to the other furnace that had been throttling up (this would be an attempt to change furnaces while maintaining non-stop drying capability). This EU includes the supplying of dried wood fuel to the Energy Unlimited furnace. This EU includes the rotary kiln drier, the eight-cyclone gang (outdoors), the operation of the dry hammermill and its associated baghouse and also the storage of this dried meal in the hopper. This EU includes the 55 foot combustion stack and the dry hammermill baghouse stack.

Building(s): Dry Tower
Dryer Area
Wet Tower

Item 18.2(From Mod 2):

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

Emission Unit: 2-FORM1

Emission Unit Description:

This emission unit consists of all pellet manufacturing operations that follow the hopper-storage of dried wood meal. Pellets are compression-formed in five pellet mills. Hot pellets are conveyed to a pellet cooler to remove heat. Two indoor cyclones and one outdoor baghouse pick up PM from the pellet cooler function; these emissions contain VOC and are released through EP00006. Ductwork collects exhausted gases from an enclosed conveyor that carries freshly-minted (hot) pellets to the pellet cooler; these gases contain VOCs and are also blown to EP00006 for atmospheric release. Cooled pellets are screened to remove fines. These finished and cooled pellets are air-conveyed through outdoor ducts to two outdoor silos (a silo baghouse is utilized {Source: BAG14}). Siloed pellets are conveyed into the bagging building where an automated bagging line fills and seals 40-pound bags. An outdoor

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

temperature minimum. Facility is authorized to operate the Torbel furnace manually during times of startup, shutdown and reasonable malfunction.

Monitoring Frequency: WHEN THE SOURCE IS OPERATING
 Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 20: Compliance Demonstration
Effective between the dates of 11/03/2014 and 11/02/2024

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

Item 20.1:
 The Compliance Demonstration activity will be performed for the Facility.

Item 20.2:
 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 1/30/2015.
 Subsequent reports are due every 12 calendar month(s).

Condition 8: Air pollution prohibited
Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR 211.1

Item 8.1:
 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 2-16: Compliance Demonstration
Effective between the dates of 07/01/2020 and 11/02/2024

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Applicable State Requirement: 6 NYCRR 212-2.1 (a)

Item 2-16.1:

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

Emission Unit: 1-DRYR1 Emission Point: 00001

Emission Unit: 2-FORM1 Emission Point: 00006

Regulated Contaminant(s):

CAS No: 000050-00-0	FORMALDEHYDE
CAS No: 000107-02-8	ACROLEIN
CAS No: 000071-43-2	BENZENE

Item 2-16.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

No control required for benzene, formaldehyde and acrolein. Stack tests on 10/9/2013 found benzene, formaldehyde and acrolein in emission points 00001 and 00006. Emission rates in EP 00001: benzene at 0.51 lb/hr, formaldehyde at 0.012 lb/hr and acrolein at 0.05 lb/hr. Emission rates in EP 00006: benzene at 0.18 lb/hr, formaldehyde at 0.062 lb/hr and acrolein at 0.001 lb/hr. Actual emissions exceed the mass emission limits in 6NYCRR 212-2.2 Table 2. The closest viable receptors were determined to be at 1800 feet away, at the backyard property lines of residences along Route 420. Aerscreen modeling was performed utilizing the 10/9/2013 stack test conditions. AGC results (at 1800 feet) for 00001 and 00006 were summed: Benzene concentration was 0.115 ug/m3, which was less than the AGC of 0.13 ug/m3, therefore no control required. Formaldehyde concentration was 0.051 ug/m3, which was less than the AGC of 0.06 ug/m3, therefore no control required. Acrolein concentration was 0.0113 ug/m3, which was less than the AGC of 0.35 ug/m3, therefore no control required. Further stack testing and/or analysis - at NYSDEC request.

Monitoring Frequency: UPON REQUEST OF REGULATORY AGENCY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

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

Condition 23: Emission Point Definition By Emission Unit
Effective between the dates of 11/03/2014 and 11/02/2024

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 23.1(From Mod 2):

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

Emission Unit: 1-DRYR1

Emission Point: 00001

Height (ft.): 55 Diameter (in.): 48
 NYTMN (km.): 4972.795 NYTME (km.): 508.543 Building: Dryer Area

Emission Point: 00002

Height (ft.): 25 Diameter (in.): 20
 NYTMN (km.): 4972.827 NYTME (km.): 508.524 Building: Wet Tower

Emission Point: 00003

Height (ft.): 22 Diameter (in.): 36
 NYTMN (km.): 4972.815 NYTME (km.): 508.571 Building: Dry Tower

Item 23.2(From Mod 2):

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

Emission Unit: 2-FORM1

Emission Point: 00004

Height (ft.): 18 Diameter (in.): 22
 NYTMN (km.): 4972.886 NYTME (km.): 508.52 Building: Bag Bldg

Emission Point: 00006

Height (ft.): 42 Length (in.): 72 Width (in.): 16
 NYTMN (km.): 4972.827 NYTME (km.): 508.524 Building: Outdrs LMK

Condition 24: Process Definition By Emission Unit

Effective between the dates of 11/03/2014 and 11/02/2024

Applicable State Requirement:6 NYCRR Subpart 201-5

Item 24.1(From Mod 2):

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

Emission Unit: 1-DRYR1

Process: 100 Source Classification Code: 3-07-020-04

Process Description:

This process consists of the operation of the wet hammermill, its dedicated cyclone and the stack (EP00002) for that cyclone. Raw green wood chips (incoming feedstock) are fed to a hopper with a front loader. A conveyor feeds these chips to the hammermill where they are re-sized and then ready to be dried.

Emission Source/Control: CYCL5 - Control

Control Type: CENTRIFUGAL

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Emission Source/Control: HAMM4 - Process
Design Capacity: 20 Oven dried tons per hour

Item 24.2(From Mod 2):

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

Emission Unit: 1-DRYR1
Process: 201 Source Classification Code: 3-90-008-89

Emission Source/Control: BURN1 - Combustion
Design Capacity: 55 million Btu per hour

Item 24.3(From Mod 2):

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

Emission Unit: 1-DRYR1
Process: 202 Source Classification Code: 3-90-008-89

Emission Source/Control: BURN2 - Combustion
Design Capacity: 14,880 pounds per hour

Item 24.4(From Mod 2):

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

Emission Unit: 1-DRYR1
Process: 203 Source Classification Code: 3-07-008-04

Process Description:

This process consists of the operation of a rotary kiln dryer (dries wood chips with hot combustion exhaust) and then the removal of these dried wood chips from that hot exhaust airstream in a series-oriented array of eight cyclones.

Emission Source/Control: CYCD1 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD2 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD3 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD4 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD5 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD6 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: CYCD7 - Control
Control Type: CENTRIFUGAL

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Emission Source/Control: CYCD8 - Control
Control Type: CENTRIFUGAL

Emission Source/Control: DRYR2 - Process
Design Capacity: 20 Oven dried tons per hour

Item 24.5(From Mod 2):

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

Emission Unit: 1-DRYR1
Process: 300 Source Classification Code: 3-07-020-04
Process Description:

This process consists of the operation of the dry hammermill, its associated baghouse and that baghouse stack (EP00003). The dry hammermill re-sizes kiln-dried wood chips down to a size that is appropriate for the pellet mills.

Emission Source/Control: BAGH7 - Control
Control Type: FABRIC FILTER

Emission Source/Control: HAMM6 - Process
Design Capacity: 20 Oven dried tons per hour

Item 24.6(From Mod 2):

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

Emission Unit: 2-FORM1
Process: 401 Source Classification Code: 3-07-004-05
Process Description:

This process consists of the operation of five pellet mills. Dried and re-sized wood chips are conveyed into these five mills where chips are compressed and formed into wood fuel pellets. Hot pellets are conveyed away. VOCs are released from the conveyor enclosure that links the pellet mills to the pellet cooler. These gases are sucked through an 16" duct and eventually to emission point 00006, for atmospheric release.

Emission Source/Control: MILL1 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL2 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL3 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL4 - Process
Design Capacity: 5 tons per hour

Emission Source/Control: MILL5 - Process

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Design Capacity: 5 tons per hour

Item 24.7(From Mod 2):

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

Emission Unit: 2-FORM1

Process: 500

Source Classification Code: 3-02-008-06

Process Description:

This process consists of the operation of a pellet cooler and a screen. Also included are two indoor cyclones and an (LMK) baghouse that together collect PM emissions. The LMK baghouse is outdoors and near the rotary kiln area and it releases through EP00006. Hot pellets from the mills are conveyed into the pellet cooler and then through a screen to remove fines. Cooled pellets are air-entrained via ductwork - out of mill building across an open asphalt tarmac and then to the two silos that are next to the bag line building.

Emission Source/Control: BAG11 - Control

Control Type: FABRIC FILTER

Emission Source/Control: CYC10 - Control

Control Type: CENTRIFUGAL

Emission Source/Control: COOL9 - Process

Design Capacity: 20 Oven dried tons per hour

Item 24.8(From Mod 2):

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

Emission Unit: 2-FORM1

Process: 600

Source Classification Code: 3-07-040-04

Process Description:

This process consists of the silo storage of pellets, the automated bagging of pellets and the operation of an outdoor baghouse (Source: BAG13). Two outdoor silos store finished softwood or hardwood pellets, a closed-loop silotop baghouse (Source: BAG14, no EP) collects PM from the silo's airspace. As the indoor bagging line demands pellets, pellets are conveyed to that bagging line where they are bagged and then robotically arraigned and wrapped onto one-ton pallets. PM from the bagging line is collected by the outdoor baghouse (Source: BAG13). This baghouse releases through EP00004.

Emission Source/Control: BAG13 - Control

Control Type: FABRIC FILTER

Emission Source/Control: BAG14 - Control

Control Type: FABRIC FILTER

Emission Source/Control: PCK12 - Process

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057

Design Capacity: 20 Oven dried tons per hour

Permit ID: 6-4099-00057/00002

Facility DEC ID: 6409900057