

**Division of Air Resources
Permit Review Report**

Permit ID: 5-5205-00005/00059

Renewal Number: 4

Modification Number: 2 06/05/2023

Facility Identification Data

Name: FINCH PAPER LLC

Address: 1 GLEN ST

GLENS FALLS, NY 12801

Owner/Firm

Name: Finch Paper LLC

Address: Forest Management

1 Glen St

Glens Falls, NY 12801, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

Name: BETH A MAGEE

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232 GOLF COURSE RD

WARRENSBURG, NY 12885-1172

Phone:5186231281

Division of Air Resources:

Name: YASMINI PATEL

Address: 232 GOLF COURSE RD

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Air Permitting Facility Owner Contact:

Name: SANDRA L LEBARRON

Address: FINCH PAPER LLC

1 GLEN ST

GLENS FALLS, NY 12801

Phone:5187932541

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

Administrative Amendment to add a monitoring condition for monitoring the Oxidation Reduction Potential (ORP) at bleach plant.

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Attainment Status

FINCH PAPER LLC is located in the town of GLENS FALLS in the county of WARREN. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone*	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor.

Facility Description:

The facility produces high-quality paper products. Manufacturing processes include pulp preparation, paper machines, acid recovery, bleaching operations, and wastewater facilities. Facility boilers include five power boilers, four recovery boilers, and a woodwaste boiler.

Permit Structure and Description of Operations

The Title V permit for FINCH PAPER LLC

is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process. A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device. [NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

FINCH PAPER LLC is defined by the following emission unit(s):

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Emission unit 400000 - Emission unit consists of the pulp mill and bleach plant.

Emission unit 400000 is associated with the following emission points (EP):

00006, 00010, 00019, 00028, 40007, 40008, 40010, 40011, 40012, 40015, 40016, 40018

Process: 401 is located at SULFUR BURNER, Building PULP - Sulfur is burned in either of two sulfur burners to produce SO₂ gas. SO₂ gas is cooled in a series of two cooling towers, and then through a packed bed absorption tower. SO₂ is absorbed with ammonia and used as cooking acid for digester. Tail gas is filtered through a mist eliminator.

Process: 402 is located at DIGESTER, Building PULP - Chips and liquor are charged to digester and are allowed to cook. Upon completion of the batch, the pulp is discharged to the blow tank, then through pulp washing, screening, thickening and the bleach plant. Off-gas from the digester relief is routed to the sulfur burner absorption tower for recovery of SO₂ for reuse in the process. Weak red liquor that is discharged from the digester is sent to evaporators and then to the recovery boilers. The evaporator off-gas is routed to the fortification tower and then an absorption tower for recovery of SO₂ for reuse in the process.

Process: 403 is located at SULFUR BURNER, Building PULP - Molten sulfur is stored prior to burning in the presence of oxygen to form SO₂ which is subsequently absorbed in ammonia to make sulfite liquor.

Process: 405 is located at Building PULP - Chlorine dioxide bleaching of the pulp occurs.

Process: 406 is located at Building PULP - Caustic extraction of the pulp.

Process: 407 is located at Building PULP - Chlorine dioxide is generated through the R-8 process. Emissions are exhausted through the bleach plant scrubber.

Process: 408 is located at Building PULP - Process consists of filtrate storage.

Emission unit 300000 - Emission unit 3-00000 consists of facility's power boiler network. Unit contains four power boilers which can burn either natural gas or #6 fuel oil during natural gas curtailment. During normal operation the power boilers exhaust through a common stack (EP00009). Each of the power boilers has an individual short stack for use if the main stack is out of service.

Emission unit 300000 is associated with the following emission points (EP):

00009, 0009B, 0009C, 0009D, 0009E

Process: 301 is located at Building POWER - Natural gas combustion for the power boilers. Oil may be burned during natural gas curtailment.

Emission unit 500000 - Emission unit 5-00000 is the facility's wastewater treatment unit. The unit consists of the wastewater collection system and the wastewater treatment system. The wastewater collection system consists of 5 pump or lifts stations for various areas of the facility. The wastewater treatment system consists of the following emission points: two mix tank vents, three primary clarifiers,

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two aeration basins, three secondary clarifiers, two gravity thickeners, a dewatering basin, two belt filter presses and a screw press.

Emission unit 500000 is associated with the following emission points (EP):
50006, 50007, 50008, 50024, 50025

Process: 502 is located at Various Locations, Building MISC - Process 502 consists of process wastewater collection. Wastewater from the paper mill, bark, recovery, woodroom, and pulp mill areas is collected through lift stations or pump stations and eventually sent to the wastewater treatment plant.

Process: 503 is located at Wastewater Treatment, Building WWT - Process 503 consists of the wastewater treatment plant. The process contains a mix tank, three primary clarifiers, two aeration basins, three secondary clarifiers, two gravity thickeners, two belt filter presses, a screw press, a sludge blend tank and a dewatering basin.

Emission unit 320000 - Emission unit 3-20000 consists of the facility's recovery boiler network. The unit contains four boilers which can burn #6 fuel oil or natural gas in order to combust product liquor. The SO₂ from the liquor combustion is collected for use as acid for digestion through ammonia towers. Brinks mist eliminators are used to control particulate emissions.

Emission unit 320000 is associated with the following emission points (EP):
00012, 0012A, 0012B, 0012C, 0012D

Process: 306 is located at Building POWER - Process consists of natural gas combustion for the recovery boilers. With this process, the boilers are exhausted through individual stacks as well as through the main recovery boiler stack.

Process: 308 is located at Building POWER - Process consists of liquor combustion for recovery boilers. It may be in conjunction with oil or natural gas combustion and the exhaust is routed through absorbers and mist eliminators.

Process: 309 is located at Building POWER - Process consists of storage of liquor and acid during the recovery process.

Emission unit 700000 - This emission unit consists of miscellaneous plant support operations including paper trim baling and a babbitt pot for wood chipper maintenance.

Emission unit 700000 is associated with the following emission points (EP):
70003, 70005

Process: 703 is located at Building MISC - This process consists of collecting and baling paper trim.

Process: 705 is located at Building MISC - This process consists of using the babbitt pot for maintaining wood chipper knives.

Emission unit 600000 - This emission unit consists of the wood chipping, debarking, and wood chip storage piles.

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Emission unit 600000 is associated with the following emission points (EP):

60001, 60002, 60003, 60004, 60005, 60006, 60007, 60008, 60009, 60010, 60011, 60012, 60013, 60014, 60015

Process: 601 is located at Building WOOD - Process consists of removing bark from wood using a drumming system.

Process: 602 is located at Building WOOD - This process consists of cutting wood into chips.

Process: 603 is located at Building WOOD - Process consists of pay loader moving bark from piles located in the wood yard to a conveyor that moves the bark to storage in the power plant.

Process: 604 Process consists of air-entrained transport of wood chips, with cyclones for retrieval and disposition of wood dust.

Process: 605 Process consists of offloading logs and moving logs to debarking using cranes.

Emission unit 800000 - Emission unit 800000 contains the facility's miscellaneous storage vessels. The tanks are located at various places in the facility.

Emission unit 800000 is associated with the following emission points (EP):

00007, 80001, 80016, 80019

Process: 801 is located at Building MISC - Process consists of storing volatile organic liquids in tanks with capacities greater than 10,000 gallons but less than 20,000 gallons. Submerged filling process is used to minimize working losses.

Process: 802 is located at Building MISC - Process consists storing volatile organic liquids in tanks smaller than 10,000 gallons.

Process: 803 is located at Building MISC - Process consists of storage of liquids that are not volatile organic liquids.

Emission unit 310000 - Emission unit 3-10000 consists of the facility's woodwaste boiler. It produces high pressure steam which is used to generate electricity and for process steam. Wood waste is combusted with natural gas. Oil may also be burned when natural gas supply is curtailed. A dust collector and venturi scrubber are used to control particulate emissions.

Emission unit 310000 is associated with the following emission points (EP):

00011

Process: 303 is located at Building POWER - Process consists of natural gas combustion for the woodwaste boiler. It also includes burning oil during natural gas curtailment.

Process: 305 is located at Building POWER - Process consists of woodwaste combustion in the woodwaste boiler. This includes digester rejects.

Emission unit 200000 - The unit consists of the facility's pulp prep and precipitated calcium carbonate

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processes.

Emission unit 200000 is associated with the following emission points (EP):

00014, 00015, 00016

Process: 201 is located at Building PCC - Slaking of lime. Dry lime (CaO) is mixed with water in a slaker, which consists of two reaction tanks and a finished calcium hydroxide (slaked lime) storage tank. The emissions from the slaker are fugitive.

Process: 202 is located at Building PCC - Manufacture of precipitated calcium carbonate (PCC) by combining slaked calcium hydroxide with carbon dioxide which is obtained from power boiler or recovery boiler flue gas in one of three carbonators.

Emission unit 100000 - Unit consists of four paper machines and their associated emission points. Sulfite stock is mixed with additives on the wet end and processed through the paper machines to form paper product. Emissions are released through the exhausters, economizers, and hood exhaust fans of the paper machines

Emission unit 100000 is associated with the following emission points (EP):

10009, 10010, 10011, 10012, 10017, 10018, 10019, 10020, 10021, 10022, 10023, 10024, 10025, 10034, 10035, 10036, 10037, 10038, 10039, 10040, 10041, 10042, 10043, 10044

Process: 101 is located at BLDGS. PM123,PM4 - Sulfite stock is used by paper machines 1-4 to form paper.

Title V/Major Source Status

FINCH PAPER LLC is subject to Title V requirements. This determination is based on the following information:

The facility is a major source of the following:

Sulfur Dioxide

Nitrogen Oxides

Carbon Monoxide

Particulates 10 micron and less (PM-10)

Volatile Organic Compounds

Hazardous Air Pollutants

Greenhouse Gasses

Program Applicability

The following chart summarizes the applicability of FINCH PAPER LLC with regards to the principal air pollution regulatory programs:

Regulatory Program

Applicability

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PSD	NO
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	YES
NSPS	YES
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	YES
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52, 6 NYCRR 231-7, 231-8) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NSR New Source Review (6 NYCRR 231-5, 231-6) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61, 6 NYCRR 200.10) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's).

MACT Maximum Achievable Control Technology (40 CFR 63, 6 NYCRR 200.10) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60, 6 NYCRR 200.10) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78, 6 NYCRR 201-6) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subpart A thru G, 6 NYCRR 200.10) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

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RACT Reasonably Available Control Technology (6 NYCRR Parts 212-3, 220-1.6, 220-1.7, 220-2.3, 220-2.4, 226, 227-2, 228, 229, 230, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH, 6 NYCRR 200.10) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

Compliance Status

Facility is in compliance with all requirements.

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2611	PULP MILLS
2621	PAPER MILLS EXC BUILDING PAPER

SCC Codes

SCC or Source Classification Code is a code developed and used" by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-006-02	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS 10-100 MMBtu/Hr
1-02-009-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - WOOD/BARK WASTE Bark-Fired Boiler (> 50,000 LB Steam)
3-01-870-98	CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - INORGANIC CHEMICAL STORAGE (FIXED ROOF TANKS) Specify Liquid: Working Loss
3-02-016-82	FOOD AND AGRICULTURE

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3-07-001-14	FOOD AND AGRICULTURE - SUGAR BEET PROCESSING LIME CRUSHER PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT)
3-07-001-15	PULPING:BLEACHING REACTORS PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT)
3-07-001-22	PULPING:CHLORINE DIOXIDE PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFATE (KRAFT) PULPING INDUSTRIAL PROCESSES:SULFATE (KRAFT)
3-07-002-22	PULPING:CAUSTIZING:GENERAL PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFITE PULPING Recovery System: NH3
3-07-002-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SULFITE PULPING SEE COMMENT **
3-07-003-01	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - NEUTRAL SULFITE SEMICHEMICAL PULPING Digester/Blow Pit/Dump Tank
3-07-003-04	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - NEUTRAL SULFITE SEMICHEMICAL PULPING Sulfur Burner/Absorbers
3-07-004-03	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PULPBOARD MANUFACTURE PULP & PAPER BOARD: RAW MATERIAL STORAGE & HANDLING
3-07-004-05	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - PULPBOARD MANUFACTURE
3-07-008-01	PULP & PAPER BOARD: PAPER/BOARD FORMING PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS Log Debarking
3-07-008-20	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIPPING AND SCREENING
3-07-008-22	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - SAWMILL OPERATIONS INDUSTRIAL PROCESSES:SAWMILL OPERATIONS:CHIP TRANSFER/CONVEYING
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS Other Not Classified
3-07-040-02	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER AND WOOD PRODUCTS STOCKPILES - WOOD/BARK
3-12-999-99	MACHINERY, MISCELLANEOUS ELECTRICAL EQUIPMENT - MISCELLANEOUS MACHINERY Other Not Classified
4-07-999-97	ORGANIC CHEMICAL STORAGE ORGANIC CHEMICAL STORAGE - MISCELLANEOUS Specify in Comments

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5-03-007-02	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - LIQUID WASTE SOLID WASTE DISPOSAL-INDUSTRIAL-LIQUID WASTE TREATMENT-GENERAL
5-03-825-99	SOLID WASTE DISPOSAL - INDUSTRIAL SOLID WASTE DISPOSAL: INDUSTRIAL - WASTEWATER, POINTS OF GENERATION WASTEWATER: SPECIFY POINT OF GENERATION

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Service code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or air contamination source to emit any air contaminant, including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE for each contaminant that is displayed represents the facility-wide PTE in tons per year (tpy) or pounds per year (lbs/yr). In some instances the PTE represents a federally enforceable emissions cap or limitation for that contaminant. The term 'HAP' refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant	PTE lbs/yr	PTE tons/yr	Actual lbs/yr	Actual tons/yr
000075-07-0	ACETALDEHYDE			781	
007664-41-7	AMMONIA			19699	
000071-43-2	BENZENE			1113	
000106-97-8	BUTANE			5553	
000124-38-9	CARBON DIOXIDE				215202
000630-08-0	CARBON MONOXIDE			816544	
000056-23-5	CARBON TETRACHLORIDE			179	
007782-50-5	CHLORINE	518			
010049-04-4	CHLORINE DIOXIDE	8367			
000067-66-3	CHLOROFORM			293	
000067-64-1	DIMETHYL KETONE			840	
000074-84-0	ETHANE			8196	
000050-00-0	FORMALDEHYDE			5136	
000110-54-3	HEXANE			4759	
007647-01-0	HYDROGEN CHLORIDE			6405	
007783-06-4	HYDROGEN SULFIDE			112	
007439-92-1	LEAD			88	
007439-96-5	MANGANESE			363	
007439-97-6	MERCURY			1	
000074-82-8	METHANE			5115	

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000067-56-1	METHYL ALCOHOL	77931	
000078-93-3	METHYL ETHYL KETONE		1109
0NY210-00-0	OXIDES OF NITROGEN	2792975	
0NY075-00-0	PARTICULATES	15000	
000109-66-0	PENTANE		6874
0NY075-02-5	PM 2.5		208502
000074-98-6	PROPANE		4231
007446-09-5	SULFUR DIOXIDE	587830	
0NY075-10-5	UNSPECIATED PM-10 (EMISSION STATEMENT USE ONLY)		13831
0NY998-10-0	UNSPECIATED VOC (EMISSION STATEMENT USE ONLY)		120704
007440-62-2	VANADIUM		131
007440-66-6	ZINC		516

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Public Access to Recordkeeping for Title V Facilities - 6 NYCRR 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for information entitled to confidential treatment pursuant to 6 NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item B: Timely Application for the Renewal of Title V Permits -6 NYCRR Part 201-6.2(a)(4)

Owners and/or operators of facilities having an issued Title V 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.

Item C: Certification by a Responsible Official - 6 NYCRR Part 201-6.2(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item D: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.4(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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- Item E: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.4(a)(3)**
This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- Item F: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR 201-6.4(a)(5)**
It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.
- Item G: Property Rights - 6 NYCRR 201-6.4(a)(6)**
This permit does not convey any property rights of any sort or any exclusive privilege.
- Item H: Severability - 6 NYCRR Part 201-6.4(a)(9)**
If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.
- Item I: Permit Shield - 6 NYCRR Part 201-6.4(g)**
All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:
- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
 - ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of Title IV of the Act;
 - iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

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Item J: Reopening for Cause - 6 NYCRR Part 201-6.4(i)

This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 2 01-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item K: Permit Exclusion - ECL 19-0305

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

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

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

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NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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_02

Item B: 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.

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Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	73	Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 60-JJJJ	30	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
FACILITY	40CFR 63-A	31	Subpart A - General Provisions apply to all NESHAP affected sources
FACILITY	40CFR 63-A.10	32, 33, 34	Recordkeeping and Reporting
FACILITY	40CFR 63-DDDDD.7500 (a) (36, 37, 38, 39	ICI Boiler Major Source NESHAP - Emission Limits and Management Practices
3-10000/-/305/00306	40CFR 63-DDDDD.7500 (a) (52, 53	ICI Boiler Major Source NESHAP - Operating Limits
3-10000/-/305/00308	40CFR 63-DDDDD.7500 (a) (54, 55	ICI Boiler Major Source NESHAP - Operating Limits
FACILITY	40CFR 63-DDDDD.7505 (d)	40	ICI Boiler Major Source NESHAP - Site-Specific Monitoring Plan
3-10000	40CFR 63-DDDDD.7525 (a)	49	ICI Boiler Major Source NESHAP - Oxygen Monitoring Requirements
3-10000	40CFR 63-DDDDD.7530 (b)	50	ICI Boiler Major Source NESHAP - Initial Compliance Demonstration Through Performance Testing
3-10000	40CFR 63-DDDDD.7540 (a)	51	ICI Boiler Major Source NESHAP - Continuous Compliance
FACILITY	40CFR 63-DDDDD.7565	41	ICI Boiler Major Source NESHAP - General Provisions
3-20000	40CFR 63-MM	58	Pulp & Paper Chemical Recovery Combustion MACT
3-20000/00012	40CFR 63-MM.862 (a) (2)	61	Existing sulfite combustion unit PM concentration limit
FACILITY	40CFR 63-MM.864 (k)	35	Monitoring Requirements for Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
4-00000	40CFR 63-	62	Pulp & Paper -

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	S.444 (c) (2) (i)		Sulfite Pulping Standards
4-00000/-/405	40CFR 63-S.445 (b)	66	Pulp & Paper - Bleaching System Standards
4-00000/-/405/00437	40CFR 63-S.445 (c) (2)	67, 68, 69	Pulp & Paper - Bleaching System Standards
4-00000/00028	40CFR 63-S.445 (c) (2)	2 -2	Pulp & Paper - Bleaching System Standards
4-00000	40CFR 63-S.453 (k)	63	Pulp & Paper - Monitoring Requirements (Enclosure & Closed Vent)
4-00000	40CFR 63-S.453 (m)	64	Pulp & Paper - Monitoring Requirements (Alternative Techniques)
4-00000/-/405/00437	40CFR 63-S.453 (o)	70	Pulp & Paper - Monitoring Requirements (Violations)
4-00000	40CFR 63-S.454 (b)	65	Pulp & Paper - Recordkeeping Requirements
FACILITY	40CFR 63-ZZZZ	42	Reciprocating Internal Combustion Engine (RICE) NESHAP
FACILITY	40CFR 68	19	Chemical accident prevention provisions
FACILITY	40CFR 82-F	20	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.6	1	Acceptable ambient air quality.
FACILITY	6NYCRR 200.7	11	Maintenance of equipment.
FACILITY	6NYCRR 201-1.4	74	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.7	12	Recycling and Salvage
FACILITY	6NYCRR 201-1.8	13	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.2 (a)	14	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-3.3 (a)	15	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6	21, 43, 44	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (4)	16	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (a) (8)	17	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c)	3	Recordkeeping and

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FACILITY	6NYCRR 201-6.4 (c) (2)	4	Reporting of Compliance Monitoring Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (d) (4)	22	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f)	23	Operational Flexibility
FACILITY	6NYCRR 201-6.4 (g)	24	Permit Shield
FACILITY	6NYCRR 201-6.5 (a)	75	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	18	Required emissions tests.
FACILITY	6NYCRR 202-2.1	7	Emission Statements - Applicability
FACILITY	6NYCRR 202-2.4 (a) (3)	2 -1	Emission statement methods and procedures
FACILITY	6NYCRR 202-2.5	8, 9	Emission Statements - record keeping requirements.
FACILITY	6NYCRR 211.1	76	General Prohibitions - air pollution prohibited
3-20000/00012	6NYCRR 211.1	78	General Prohibitions - air pollution prohibited
4-00000/-/401/00402	6NYCRR 211.1	79, 80	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	25	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-1.6 (a)	26	Limiting of Opacity
3-20000/00012	6NYCRR 212-1.6 (a)	59	Limiting of Opacity
2-00000	6NYCRR 212-2.4 (b)	45	Control of Particulate from New and Modified Process Emission Sources
3-20000/00012	6NYCRR 212-3.1 (c) (3)	60	RACT compliance plans for NOx emission points
FACILITY	6NYCRR 215.2	10	Open Fires - Prohibitions
FACILITY	6NYCRR 225-1.2 (c)	27	Sulfur-in-Fuel Limitations - Residual Oil
FACILITY	6NYCRR 225-1.2 (d)	28	Sulfur-in-Fuel Limitation - Distillate Oil
3-10000/00011	6NYCRR 227-1.3 (a)	56	Particulate Emission Standards
FACILITY	6NYCRR 227-1.4 (a)	29	Opacity Standard
3-10000/00011	6NYCRR 227-1.4 (a)	57	Opacity Standard
3-10000	6NYCRR 227-2.4 (b)	47	Large boilers.
3-00000	6NYCRR 227-2.5 (c)	1 -1	Alternative RACT option.
3-10000	6NYCRR 227-2.6 (a)	48	Applicable testing

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8-00000/-/801	6NYCRR 229.3(e)(2)(iv)	71	and/or monitoring requirements.
8-00000/-/802	6NYCRR 229.3(e)(2)(v)	72	Volatile organic liquid storage tanks
3-10000/-/303/00328	6NYCRR 251.2(b)	77	Volatile organic liquid storage tanks Non-modified existing sources.

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-0301

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6 NYCRR 200.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6 NYCRR 200.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6 NYCRR 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6 NYCRR 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6 NYCRR 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

6 NYCRR 201-3.2 (a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, 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.

6 NYCRR 201-3.3 (a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to 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.

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6 NYCRR Subpart 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6 NYCRR 201-6.4 (a) (4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6 NYCRR 201-6.4 (a) (7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6 NYCRR 201-6.4 (a) (8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6 NYCRR 201-6.4 (c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6 NYCRR 201-6.4 (c) (2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6 NYCRR 201-6.4 (c) (3) (ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6 NYCRR 201-6.4 (d) (4)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted

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semiannually.

6 NYCRR 201-6.4 (e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6 NYCRR 201-6.4 (g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6 NYCRR 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6 NYCRR 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

6 NYCRR 211.2

This regulation limits opacity from sources to less than or equal to 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent opacity.

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.

40 CFR Part 68

This Part lists the regulated substances and there applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act AmENDments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, FINCH PAPER LLC has been determined to be subject to the following regulations:

40 CFR 63.10

Section 63.10 contains default general recordkeeping requirements as well as recordkeeping for

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applicability determinations and continuous monitoring systems. It also contains default reporting requirements for "one shot" items such as performance test results and immediate startup shutdown, malfunction reports. It also contains periodic (semi-annual) reporting requirements for startup, shutdown, and malfunction; excess emissions; and continuous monitoring performance.

40 CFR 63.444 (c) (2) (i)

Emit no more than 1.1 kilograms of total HAP or methanol per megagram (2.2 pounds per ton) of oven dried pulp.

40 CFR 63.445 (b)

Emissions from pulp bleaching systems sources where chlorine or chlorinated compounds are introduced must be collected and properly transported to an appropriate control device.

40 CFR 63.445 (c) (2)

The oxidation reduction potential (ORP) of the R8 process shall be maintained at a maximum value based on best engineering practice and confirmed or adjusted based on emissions testing. The current maximum value is -300 mV. The owner or operator shall install an ORP probe and a backup probe with a system that alarms whenever the difference between the two probes is 30mV or greater.

40 CFR 63.453 (k)

This citation states the requirements for enclosures and closed-vent systems.

40 CFR 63.453 (m)

This citation states the requirements for sources complying with alternative parameters.

40 CFR 63.453 (o)

This citation states that sources shall operate control equipment in a manner consistent with the operating limits.

40 CFR 63.454 (b)

This citation states the requirements for a site-specific monitoring plan.

40 CFR 63.7500 (a) (1)

These conditions state what emission limits and management practices affected sources with which the

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owner or operator must comply

40 CFR 63.7500 (a) (2)

These conditions state the operating limits owners or operators of industrial, commercial, or institutional boilers must follow

40 CFR 63.7505 (d)

This condition states that owners or operators of industrial, commercial, and institutional boilers who demonstrate compliance with any applicable emission limit through stack testing and subsequent compliance with operating limits must develop a site-specific monitoring plan

40 CFR 63.7525 (a)

This regulation requires the installation of a continuous oxygen monitor at the outlet of the boiler.

40 CFR 63.7530 (b)

This citation states the requirements to establish site-specific operating limits and conduct fuel analyses.

40 CFR 63.7540 (a)

This condition states how to demonstrate continuous compliance with emission limits, work practice standards, and operating limits.

40 CFR 63.7565

This regulation specifies which provisions of the General provisions (Subpart A of 40 CFR 63) apply to the owner or operators of industrial, commercial, and institutional boilers at major source facilities of hazardous air pollutants.

40 CFR 63.862 (a) (2)

The owner or operator of each existing sulfite combustion unit must ensure that the concentration of PM in the exhaust gases discharged to the atmosphere is less than or equal to 0.092 g/dscm (0.040 gr/dscf) corrected to 8 percent oxygen.

40 CFR 63.864 (k)

This regulation requires the owners or operators of all affected sources or process units to implement corrective action, as specified in the startup, shutdown, and malfunction plan if the monitoring system

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detects exceedances of the standards.

40 CFR Part 60, Subpart JJJJ

Subpart JJJJ applies to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in §60.4230, paragraphs (a)(1) through (6). Sources subject to Subpart JJJJ must comply with emission standards for nitrogen oxides, carbon monoxide, and volatile organic compounds.

40 CFR Part 63, Subpart A

The General Provisions in 40CFR63, Subpart A apply to facilities subject to other National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP) regulations in 40 CFR 63. These rules are also known as MACT rules since they are based on attaining Maximum Achievable Control Technology. Each MACT rule has a table or section that describe which portions of the General Provisions apply to facilities covered by that particular rule and which portions are overridden or do not apply. Note that NESHAP regulations found in 40CFR61 do **not** trigger the general provisions of 40CFR63.

40 CFR Part 63, Subpart MM

Subpart MM applies to kraft, soda, sulfite, or stand-alone semichemical pulp mill at a major source of HAP. Sources subject to Subpart MM must comply with emission limits for HAP metals and organic HAP.

40 CFR Part 63, Subpart ZZZZ

Subpart ZZZZ applies to reciprocating internal combustion engines. Sources subject to Subpart ZZZZ must limit emissions of carbon monoxide and formaldehyde. Sources must also comply with work practice standards and operating limits.

6 NYCRR 201-6.4 (f)

This section describes the potential for certain operational changes to be made by the facility owner or operator without first obtaining a permit modification. Changes made pursuant to this provision must meet all of the criteria described in this section to qualify for consideration as operational flexibility. The Department reserves the right to require the facility owner or operator to obtain a permit modification prior to making any changes at the facility pursuant to this section.

6 NYCRR 201-6.5 (a)

This subdivision states that the Department shall include state enforceable conditions in Title V permits. State enforceable conditions related to regulations developed pursuant to the Climate Leadership and Community Protection Act (CLCPA) and Article 75 of New York State Environmental Conservation

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Law may be included in future versions of this permit, as applicable.

6 NYCRR 202-2.4 (a) (3)

Once a facility is required to submit annual emission statements electronically, emission statements must be submitted to the department per the specified schedule, in this regulation beginning the reporting year that a Title V permit containing a condition mandating electronic submittal is issued.

6 NYCRR 211.1

This regulation requires that 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.

6 NYCRR 212-1.6 (a)

This provisions requires that the facility owner or operator not 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.

6 NYCRR 212-2.4 (b)

Particulate emissions from any process emission source, which received a B or C Environmental Rating, and for which an application was received by the department after July 1, 1973 are restricted to 0.050 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis.

6 NYCRR 212-3.1 (c) (3)

This provision states that owners and/or operators of emission points subject to Part 212-3 must submit a compliance plan to the department by October 20, 1994 or upon startup. The RACT compliance plan for NOx emission points must include technically feasible control strategies to minimize NOx formation and emission control equipment alternatives. These process specific RACT demonstrations that are acceptable to the department will be submitted to the United States Environmental Protection Agency for approval as a revision to the State Implementation Plan by the department.

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6 NYCRR 225-1.2 (c)

This subdivision sets the sulfur-in-fuel limitation for residual oil fired emission sources throughout the State.

6 NYCRR 225-1.2 (d)

This subdivision sets the sulfur-in-fuel limitation for distillate oil fired emission sources throughout the State.

6 NYCRR 227-1.3 (a)

This subdivision sets the particulate matter emission standards for subject stationary combustion installations.

6 NYCRR 227-1.4 (a)

This subdivisions sets the opacity standard for subject stationary combustion installations.

6 NYCRR 227-2.4 (b)

NO_x RACT for large boilers.

6 NYCRR 227-2.5 (c)

This provision allows the owner or operator to demonstrate that the applicable presumptive RACT emission limit in section 227-2.4 of this Subpart is not economically or technically feasible. Based on this determination the Department is allowed to set a higher emission source specific emission limit.

6 NYCRR 227-2.6 (a)

Applicable testing and/or monitoring requirements for emission sources subject to NO_x RACT.

6 NYCRR 229.3 (e) (2) (iv)

This section requires a tank with submerged fill for storage of volatile organic liquids

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6 NYCRR 229.3 (e) (2) (v)

This section requires the tank to be equipped with conservation vents for storage of volatile organic liquids.

6 NYCRR 251.2 (b)

This exempts the facility from Part 251 emission limits since the plant sells less than 10% of the electricity it generates.

Compliance Certification

Summary of monitoring activities at FINCH PAPER LLC:

Location Facility/EU/EP/Process/ES	Cond No.	Type of Monitoring

FACILITY	30	record keeping/maintenance procedures
FACILITY	34	record keeping/maintenance procedures
FACILITY	36	intermittent emission testing
FACILITY	37	intermittent emission testing
FACILITY	38	intermittent emission testing
FACILITY	39	intermittent emission testing
3-10000/-/305/00306	52	monitoring of process or control device parameters as surrogate
3-10000/-/305/00306	53	monitoring of process or control device parameters as surrogate
3-10000/-/305/00308	54	monitoring of process or control device parameters as surrogate
3-10000/-/305/00308	55	monitoring of process or control device parameters as surrogate
FACILITY	40	record keeping/maintenance procedures
3-10000	49	record keeping/maintenance procedures
3-10000	50	record keeping/maintenance procedures
3-10000	51	record keeping/maintenance procedures
3-20000	58	record keeping/maintenance procedures
3-20000/00012	61	intermittent emission testing
FACILITY	35	monitoring of process or control device parameters as surrogate
4-00000	62	intermittent emission testing
4-00000/-/405/00437	67	monitoring of process or control device parameters as surrogate
4-00000/-/405/00437	68	monitoring of process or control device parameters as surrogate
4-00000/-/405/00437	69	intermittent emission testing
4-00000/00028	2-2	monitoring of process or control device parameters as surrogate
4-00000	63	record keeping/maintenance procedures
4-00000	64	work practice involving specific operations
4-00000/-/405/00437	70	monitoring of process or control device parameters as surrogate

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4-00000	65	record keeping/maintenance procedures
FACILITY	42	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	7	record keeping/maintenance procedures
3-20000/00012	78	continuous emission monitoring (cem)
4-00000/-/401/00402	79	monitoring of process or control device parameters as surrogate
4-00000/-/401/00402	80	continuous emission monitoring (cem)
FACILITY	26	record keeping/maintenance procedures
3-20000/00012	59	monitoring of process or control device parameters as surrogate
2-00000	45	intermittent emission testing
3-20000/00012	60	continuous emission monitoring (cem)
FACILITY	27	work practice involving specific operations
FACILITY	28	work practice involving specific operations
3-10000/00011	56	intermittent emission testing
FACILITY	29	monitoring of process or control device parameters as surrogate
3-10000/00011	57	record keeping/maintenance procedures
3-10000	47	intermittent emission testing
3-00000	1-1	monitoring of process or control device parameters as surrogate
3-10000	48	record keeping/maintenance procedures
8-00000/-/801	71	record keeping/maintenance procedures
8-00000/-/802	72	record keeping/maintenance procedures
3-10000/-/303/00328	77	monitoring of process or control device parameters as surrogate

Basis for Monitoring

Bleaching Sources - 40CFR63 Subpart S requires collection and control of exhaust gases from sources where chlorinated compounds are introduced. The facility complies with the option of controlling the pollutant to 10 parts per million or less of chlorinated HAP emissions using a scrubber. The monitoring scheme to ensure compliance includes an initial stack test to demonstrate initial compliance and to establish pH, exhaust flow rate and scrubber filtrate flow rate parameters. These parameters are continuously monitored. Once each permit term, a stack test is required to ensure that the scrubber still meets control requirements. A report is submitted semiannually addressing excess emissions and continuous monitoring system performance.

Pulping Sources - 40CFR63 Subpart S requires that total methanol emissions from designated sources not exceed 2.2 pounds per oven dried ton of pulp. Emissions testing has demonstrated that within approved digester rate parameters, the facility meets this requirement with no emissions controls. Digester rate is monitored daily to ensure that it does not exceed 525 tons per day. Stack testing for Methanol emissions is performed once per 5 year permit term.

Sulfur Burner - This source is also regulated by 6 NYCRR Part 212 to control sulfur dioxide emissions. These emissions are controlled by a scrubber with

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emissions rate of less than 10 pounds per hour. The pH of the scrubber solution is continuously monitored and a continuous emissions monitor records SO₂ emissions.

NO_x RACT - NO_x RACT studies for the power boilers, wood waste boiler and recovery boilers established nitrogen oxides (NO_x) emission limits. These RACT analyses have been submitted to EPA for approval as single source SIP revisions.

The wood waste boiler met RACT as operated and requires only periodic testing to ensure it continues to meet emission limits.

The power boilers plan restricts the facility to natural gas only (except during curtailment). It establishes a new limit of 0.225 pounds per million Btu during the ozone season. NO_x emissions are calculated daily based on boiler steaming rates and emission rate curves developed for each boiler. The calculations are verified with daily measurements with a Testo combustion analyzer. Further confirmation will be provided with annual stack testing performed at the time of Recovery Boilers relative accuracy test audit (RATA).

The recovery boilers stack has a continuous emissions monitor for NO_x emissions.

Misc. Particulate Emissions - The recovery boilers and waste wood boiler are subject to stack testing for particulates under MACT requirements. The wood waste boiler is controlled by a scrubber. A stack test must be performed every three years and that test will set flow and pressure drop parameters that the scrubber must meet to demonstrate compliance. These parameters are monitored continuously.

When not burning natural gas exclusively, the recovery boilers exhaust through absorbers and mist eliminators. The mist eliminators have pressure drop limits established similar to those that have been implemented on the wood waste boiler. When not burning natural gas exclusively, both the waste wood boiler and recovery boilers are observed daily for opacity.

The wood waste boiler is also subject to stack testing to demonstrate compliance with Boiler MACT limits on emissions of mercury, hydrogen chloride and carbon monoxide. The stack test sets a minimum oxygen content for the boiler. This is monitored continuously to ensure that excessive carbon monoxide is not created.

The recovery boilers have a sulfur dioxide emission limit of 100 parts per million under 6 NYCRR Part 212. This is monitored continuously with a sulfur dioxide continuous emissions monitor

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