

**Division of Air Resources
Permit Review Report**

Permit ID: 6-2336-00028/00051

Renewal Number: 4

12/04/2023

Facility Identification Data

Name: NEENAH NORTHEAST - LOWVILLE

Address: 5492 BOSTWICK ST

LOWVILLE, NY 13367

Owner/Firm

Name: NEENAH NORTHEAST LLC

Address: 3460 Preston Ridge Rd Ste 600

Alpharetta, GA 30005, USA

Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:

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317 WASHINGTON ST

WATERTOWN, NY 13601

Phone:

Division of Air Resources:

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Air Permitting Contact:

Name: JONATHAN ROSE

Address: NEENAH NORTHEAST LLC

5492 BOSTWICK ST

LOWVILLE, NY 13367

Phone:3153764861

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

Application for renewal of Air Title V Facility. The facility has drastically reduced formaldehyde PTE, therefore a 212 limit on formaldehyde emissions has been removed. A CLCPA analysis and Air dispersion modeling were also conducted as a part of this renewal.

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Attainment Status

NEENAH NORTHEAST - LOWVILLE is located in the town of LOWVILLE in the county of LEWIS. 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 manufactures products for books & folders, utilizing RACT compliant coating machines and aqueous-based printers. Coatings are applied to a paper, leather, or textile substrate. Other sources at the facility include two natural gas fired boilers, mixing & handling areas for coatings, solvent storage tanks, and wastewater treatment operations.

Permit Structure and Description of Operations

The Title V permit for NEENAH NORTHEAST - LOWVILLE 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

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control - emission control devices
process - any device or contrivance which may emit air contaminants that is not included in the above categories.

NEENAH NORTHEAST - LOWVILLE is defined by the following emission unit(s):

Emission unit 000002 - Facility Coaters - Aqueous Coater No. 2 (CR2AQ) (emission points 00033, 00034, 00035 and 00036); Aqueous Coater No. 8 (CR8AQ) (emission points 00037, 00038, 00039 and 00040); Aqueous Coater #11 (CTR11) (emission point 00024).

Aqueous coaters are all classified as two and three station coaters, front and back, paper and other substrates, water Base Coaters and Dryers.

One station Aqueous Printer/Coater #4 (PR4AQ) (emission point 00041), front and/or back paper or other substrates and associated dryers.

This unit also includes emission point 00042, 00043, 00044, and 00045 which ventilate the 55-gallon drum staging areas located at each coater.

Emission unit 000002 is associated with the following emission points (EP):

00024, 00033, 00034, 00035, 00036, 00037, 00038, 00039, 00040, 00041, 00042, 00043, 00044, 00045
Process: 021 is located at Building MAIN - This process includes 1 operational coater at the plant. Inside coater 11; coating is applied to a paper or other substrate and then dried to create a rigid or semi-rigid binder for books and folders.

Process: 022 is located at Building MAIN - The first coating head applies an aqueous latex based acrylic coating to a paper substrate. The web then enters the first two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled and receives a topcoat. The web then enters the second two zone dryer, which is natural gas fired (1.5 MMBTU/HR/ZONE). The web is then cooled, and a water back up coat applied. The web then enters the second two zone dryer and is finally rewound.

Process: 024 is located at Building MAIN - The single station printer/coater will apply inks to paper and other substrates by utilizing various application methods such as Rotogravure, Knife and Stork (rotary silk screen) Printing. Once the print is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 026 is located at Building MAIN - The single station printer/coater will apply coatings to paper and other substrates. Once the coating is applied, the web then enters a two-zone dryer that is natural gas fired (500,000 but/hr per Zone). The web is then cooled and finally rewound.

Process: 028 is located at Building MAIN - Process exhaust originating from 55 gallon drum staging area at emissions sources CR2AQ, CR8AQ, CTR11 and PR4AQ. Process 028 total throughput values are based on coater throughputs. (All emissions from these exhausts will be captured in the monthly coating usage)

Emission unit 000003 - Waterbased coating make-up room Schold's Mixer. Emission point 00016. Water-based coating make-up room. Emission point 00031 associated with room.

Emission unit 000003 is associated with the following emission points (EP):

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00016, 00031

Process: 031 is located at Building MAIN - Designated areas in the plant are used for the blending and mixing of solvent based and water based coatings.

Emission unit 000005 - By emission unit and process (see dropdown menu).

Emission unit 000005 is associated with the following emission points (EP):
00048, 00049, 00050, 00052, 00054, 00055, 00056

Process: 030 is located at Building MAIN - This process includes Printer/Coater 3AQ (previously Coater #5), the Tandem Coater, Printer #1 and Printer #2, print heads and associated floor sweeps that utilize multiple coating stations to apply coatings to paper or other substrates. Once the coatings are applied, the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Process: 032 is located at Building MAIN - Wash down water from aqueous coating and printing lines is treated by pH adjustment to precipitate metals, which are removed using two rotary vacuum drum filters prior to discharge.

Process: 033 is located at Building MAIN - This process includes the dispensing of coating and ink solutions into 55-gallon drums in the facility's color mix room. Raw materials and previously mixed formulations are added to the drums utilizing automatic and manual dispensing systems. Prior to dispensing, raw materials are combined and mixed into solution to match formulations. The raw materials are stored utilizing: larger storage tanks, tote bins, drums and pails. All of the equipment used prior to dispensing already exists or is exempt from permitting. After dispensing, the solutions are transported for use at the coating and printing equipment. One dispenser is also located in the printer area.

Process: 034 is located at Building MAIN - This process includes Printer/Coater 3AQ (previously Coater #5), Printer #1, Printer #2, print heads and associated floor sweeps that utilize multiple stations to apply inks to paper and other substrates by using knife and rotogravure printing. Once the print is applied the web enters multiple zone gas fired dryers; the web is then cooled and finally rewound.

Emission unit 000001 - Facility Boilers - North American Model 3350 - Emission Point 00001 and ORR & Sembower Inc. - Emission Point 00002.

Emission unit 000001 is associated with the following emission points (EP):
00001, 00002

Process: 012 is located at Building MAIN - Boilers burning natural gas. Two boilers (BLR01 and BLR02) are located in the plant. Both boilers were retrofitted to burn natural gas in 12/97. Process 012 thruput values are based on published boiler capacities.

Title V/Major Source Status

NEENAH NORTHEAST - LOWVILLE is subject to Title V requirements. This determination is based on the following information:

Neenah Northeast's Lowville facility is an Air Title V major facility for potential emissions of HAPs and VOCs. The facility has a potential-to-emit greater than the Title V major threshold for

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VOC's (109 tons per year), Total HAP's (55 tons per year), and Carbitol, also known as 2-(2-Ethoxyethoxy)ethanol (42 tons per year). All actual emissions are below Title V major thresholds.

Program Applicability

The following chart summarizes the applicability of NEENAH NORTHEAST - LOWVILLE with regards to the principal air pollution regulatory programs:

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

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52.21, 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

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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.

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

2672 2621	PAPER COATED AND LAMINATED, NEC PAPER MILLS EXC BUILDING PAPER
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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.

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SCC Code	Description
1-03-006-02	EXTERNAL COMBUSTION BOILERS - COMMERCIAL/INDUSTRIAL COMMERCIAL/INSTITUTIONAL BOILER - NATURAL GAS
3-01-020-17	10-100 MMBtu/Hr CHEMICAL MANUFACTURING CHEMICAL MANUFACTURING - PRINTING INK MANUFACTURE
4-02-013-01	PREMIX/PREASSEMBLY: DRUMS SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation
4-02-013-03	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Mixing
4-02-013-04	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Storage
4-02-820-02	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - WASTEWATER, AGGREGATE
4-05-005-01	WASTEWATER: PROCESS EQUIPMENT DRAINS PRINTING/PUBLISHING PRINTING/PUBLISHING - GENERAL Gravure - 2754

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
000872-50-4	1-METHYL-2-PYRROLIDONE	47104		1962	
000107-98-2	2-PROPANOL, 1-METHOXY	18530		2728	
000079-10-7	2-PROPENOIC ACID	710		72	
000080-62-6	2-PROPENOIC ACID, 2-METHYL-, METHYL ESTER	130		3.5	

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000108-05-4	ACETIC ACID	950	125
	ETHENYL ESTER		
007664-41-7	AMMONIA	66453	5810
007440-38-2	ARSENIC	0.1	0.0082
000071-43-2	BENZENE	1.1	0.09
007440-41-7	BERYLLIUM	0.0061	0.00049
007440-43-9	CADMIUM	0.56	0.045
000124-38-9	CARBON DIOXIDE	37775226	4960375
0NY750-00-0	CARBON DIOXIDE	37853824	4970695
	EQUIVALENTS		
000630-08-0	CARBON MONOXIDE	42503	3448
007440-47-3	CHROMIUM	1.2	0.18
018540-29-9	CHROMIUM(VI)	0.7	0.17
007440-48-4	COBALT	0.043	0.0035
025321-22-6	DICHLOROBENZ ENE	0.61	0.049
000067-64-1	DIMETHYL KETONE		66
111109-77-4	DIPROPYLENE	13755	1522
	GLYCOL DIMETHYL ETHER		
000111-90-0	ETHANOL, 2- (2- ETHOXYETHOXY)	84030	3261
000111-76-2	ETHANOL, 2- BUTOXY-	1856	287
000064-17-5	ETHYL ALCOHOL (ETHANOL)	3051	414
000050-00-0	FORMALDEHYDE	114	13
000110-54-3	HEXANE	911	74
001309-37-1	IRONOXIDE (FERRIC OXIDE)	4.5	0.049
007439-92-1	LEAD	0.31	0.035
007439-96-5	MANGANESE	8.8	2.1
007439-97-6	MERCURY	0.13	0.011
000074-82-8	METHANE	712	
000067-56-1	METHYL ALCOHOL	15897	84
000057-55-6	METHYLETHYL GLYCOL	15	0.23
000121-44-8	N,N-DIETHYL ETHANAMINE	7111	616
000091-20-3	NAPHTHALENE	0.31	0.025
008030-30-6	NAPHTHA	3568	95
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS	1.7	0.24
010024-97-2	NITROUS OXIDE	71	
008002-09-3	OIL OF FIR- SIBERIAN	291	11
0NY210-00-0	OXIDES OF NITROGEN	50598	2.1
0NY075-00-0	PARTICULATES	3845	312
0NY075-02-5	PM 2.5	3845	312
0NY075-00-5	PM-10	3845	312
0NY505-00-0	POLYCYCLIC ORGANIC MATTER (POM)	0.045	0.0036
025265-71-8	PROPANOL,	9319	141

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000103-11-7	OXYBIS PROPENOIC ACID, 2- ETHYLHEXYL ESTER	1658	143
007782-49-2	SELENIUM	0.012	0.00099
112926-00-8	SILICA GEL,CRYSTILINE FREE	45	11
000100-42-5	STYRENE	99	7.5
007446-09-5	SULFUR DIOXIDE	304	25
009014-85-1	TETRAMETHYL DECYNDIOL	7107	642
013463-67-7	TITANIUM DIOXIDE	13	0.14
000108-88-3	TOLUENE	1.7	0.14
0NY100-00-0	TOTAL HAP	109970	4258
0NY998-00-0	VOC	218040	12350

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.

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

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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.

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

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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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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.

Regulatory Analysis

Location Facility/EU/EP/Process/ES	Regulation	Condition	Short Description
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FACILITY	ECL 19-0301	78		Powers and Duties of the Department with respect to air pollution control
FACILITY	40CFR 63-A.10 (b)	38		Part 63 General Recordkeeping Requirements
FACILITY	40CFR 63-A.10 (d)	39		Part 63 General Reporting Requirements
0-00001	40CFR 63- DDDDD.7500 (a) (65		ICI Boiler Major Source NESHAP - Emission Limits and Management Practices
0-00001	40CFR 63- DDDDD.7550 (c)	66		ICI Boiler Major Source NESHAP - Compliance Reports
0-00001	40CFR 63- DDDDD.7550 (d)	67		ICI Boiler Major Source NESHAP - Deviation Reporting at Facilities not Using CMS
0-00001	40CFR 63- DDDDD.7555 (a)	68		ICI Boiler Major Source NESHAP - Recordkeeping
0-00001	40CFR 63-DDDDD.7560	69		ICI Boiler Major Source NESHAP - Record Format
0-00003/-/031	40CFR 63- HHHHH.8000 (a)	73		Miscellaneous Coating Mfg. NESHAP - General Requirements
0-00003/-/031	40CFR 63- HHHHH.8000 (b)	74		Miscellaneous Organic Coating Mfg. NESHAP - General Requirements
0-00003/-/031	40CFR 63-HHHHH.8055	75		Misc. Organic Coating Mfg. NESHAP - Coating products weight percent HAP limit option
FACILITY	40CFR 63- JJJJ.3320 (b) (2	48		Paper and Other Web Coating NESHAP - emission standard based on mass of coating materials
FACILITY	40CFR 63- JJJJ.3320 (b) (3	49		Paper and Other Web Coating NESHAP - Emission standard - mass of coating solids option
FACILITY	40CFR 63-JJJJ.3330 (a)	50		Compliance date for existing affected sources.
FACILITY	40CFR 63-JJJJ.3330 (b)	51		Paper and Other Web Coating NESHAP - Compliance date for new affected sources
FACILITY	40CFR 63-JJJJ.3360 (c)	52		Paper and Other Web Coating NESHAP - Determination of organic HAP content
FACILITY	40CFR 63-JJJJ.3360 (d)	53		Paper and Other Web Coating NESHAP -

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FACILITY	40CFR 63-JJJJ.3370 (b)	54	Determination of volatile organic content and coating solids content
FACILITY	40CFR 63-JJJJ.3370 (c)	55, 56	Paper and Other Web Coating NESHAP - Requirements for showing compliance
FACILITY	40CFR 63-JJJJ.3370 (c) (5)	57	Paper and Other Web Coating NESHAP - Compliance demonstration for as-applied "compliant" coating materials
FACILITY	40CFR 63-JJJJ.3400 (c) (1)	58	Paper and Other Web Coating NESHAP - Submission of semiannual compliance reports.
FACILITY	40CFR 63-JJJJ.3400 (c) (2)	59	Paper and Other Web Coating NESHAP - Semiannual compliance report contents.
FACILITY	40CFR 63-JJJJ.3410 (a)	60	Paper and Other Web Coating NESHAP - Record keeping requirements.
FACILITY	40CFR 63-KK.820 (b)	40	Printing and Publishing NESHAP - exemption for research and laboratory equipment
FACILITY	40CFR 63-KK.821 (a) (3)	41	Printing and Publishing NESHAP- designation of affected sources
FACILITY	40CFR 63-KK.821 (c)	42	Printing and Publishing NESHAP- designation of affected sources
FACILITY	40CFR 63-KK.825 (b)	43	Printing and Publishing NESHAP- standard: product and packing rotogravure and wide-web flexographic printing
FACILITY	40CFR 63-KK.827 (b) (2)	44	Performance Test Methods - Printing & Publishing MACT
FACILITY	40CFR 63-KK.827 (c) (3)	45	Printing and publishing NESHAP- performance test standards
FACILITY	40CFR 63-KK.829 (b) (1)	46	Recordkeeping requirements
FACILITY	40CFR 63-KK.830 (b) (6)	47	Printing and Publishing NESHAP- Reporting

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FACILITY	40CFR 68	17	requirements
FACILITY	40CFR 82-F	18	Chemical accident prevention provisions
FACILITY	6NYCRR 200.6	1	Protection of Stratospheric Ozone - recycling and emissions reduction
FACILITY	6NYCRR 200.7	9	Acceptable ambient air quality.
FACILITY	6NYCRR 201-1.4	79	Maintenance of equipment.
FACILITY	6NYCRR 201-1.7	10	Unavoidable noncompliance and violations
FACILITY	6NYCRR 201-1.8	11	Recycling and Salvage
FACILITY	6NYCRR 201-3.2 (a)	12	Prohibition of reintroduction of collected contaminants to the air
FACILITY	6NYCRR 201-3.3 (a)	13	Exempt Activities - Proof of eligibility
FACILITY	6NYCRR 201-6	19, 61, 62	Trivial Activities - proof of eligibility
FACILITY	6NYCRR 201-6.4 (a) (4)	14	Title V Permits and the Associated Permit Conditions
FACILITY	6NYCRR 201-6.4 (a) (7)	2	General Conditions - Requirement to Provide Information
FACILITY	6NYCRR 201-6.4 (a) (8)	15	General Conditions - Fees
FACILITY	6NYCRR 201-6.4 (c)	3	General Conditions - Right to Inspect
FACILITY	6NYCRR 201-6.4 (c) (2)	4	Recordkeeping and Reporting of Compliance Monitoring
FACILITY	6NYCRR 201-6.4 (c) (3) (ii)	5	Records of Monitoring, Sampling and Measurement
FACILITY	6NYCRR 201-6.4 (d) (4)	20	Reporting Requirements - Deviations and Noncompliance
FACILITY	6NYCRR 201-6.4 (e)	6	Compliance Schedules - Progress Reports
FACILITY	6NYCRR 201-6.4 (f)	21	Compliance Certification
FACILITY	6NYCRR 201-6.4 (f) (2)	22	Operational Flexibility
FACILITY	6NYCRR 201-6.5 (a)	80	Operational Flexibility - Protocol
FACILITY	6NYCRR 201-7	63	State Enforceable Requirements
FACILITY	6NYCRR 202-1.1	16	Federally Enforceable Emissions Caps
FACILITY	6NYCRR 202-2.4 (a) (3)	23	Required emissions tests.
FACILITY	6NYCRR 202-2.5	7	Emission statement methods and procedures
FACILITY			Emission Statements - record keeping requirements.

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FACILITY	6NYCRR 211.1	81	General Prohibitions - air pollution prohibited
FACILITY	6NYCRR 211.2	24	General Prohibitions - visible emissions limited.
FACILITY	6NYCRR 212-2.4 (b)	25	Control of Particulate from New and Modified Process Emission Sources
FACILITY	6NYCRR 215.2	8	Open Fires - Prohibitions
FACILITY	6NYCRR 217-3.3	82	Exceptions.
0-00001	6NYCRR 227-1.4 (a)	64	Opacity Standard
FACILITY	6NYCRR 228-1.1 (a) (3)	26	Once in always in
FACILITY	6NYCRR 228-1.1 (b) (9)	27	55 gallons- or 400 pounds VOC
FACILITY	6NYCRR 228-1.10	33	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 228-1.3 (a)	28	Surface Coating General Requirements-
FACILITY	6NYCRR 228-1.3 (c)	29	Opacity Surface Coating General Requirements-
0-00005/-/030	6NYCRR 228-1.4 (d) (3)	77	Prohibitions VOC limits for Paper Film & Foil coatings
FACILITY	6NYCRR 228-1.6 (a)	30	Surface coating VOC analysis.
FACILITY	6NYCRR 228-1.6 (c)	31	Surface coating access for sampling
FACILITY	6NYCRR 228-1.6 (h)	32	Records reporting and maintaining
0-00002/-/024	6NYCRR 234.3 (a) (1) (i)	70	Control requirements - Ink
0-00002/-/024	6NYCRR 234.3 (e) (1) (i) ('	71	Control requirements - screen printing
FACILITY	6NYCRR 234.3 (f)	34	Control requirements - RACT demonstration
0-00002/-/024	6NYCRR 234.4 (b)	72	Testing and monitoring - test methods
FACILITY	6NYCRR 234.6	35	Handling, storage and disposal of VOCs
FACILITY	6NYCRR 234.7	36	Recordkeeping requirements
FACILITY	6NYCRR 234.8	37	Opacity

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

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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.

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.

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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 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 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

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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 their 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, NEENAH NORTHEAST - LOWVILLE has been determined to be subject to the following regulations:

40 CFR 63.10 (b)

This condition states the general recordkeeping requirements for 40 CFR Part 63 regulations.

40 CFR 63.10 (d)

This condition states the general reporting requirements for 40 CFR Part 63 regulations.

40 CFR 63.3320 (b) (2)

This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 4% of the mass of the coating materials as organic HAP for existing sources and 1.6% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

40 CFR 63.3320 (b) (3)

This condition reduces the emissions of hazardous air pollutants by requiring the facility to meet an emission limit for organic HAP that are emitted from the coating processes. The facility must not emit more than 20% of the mass of the coating solids as organic HAP for existing sources and 8% for new sources.

The facility will prove that it is meeting this limit during the initial compliance demonstration that is also required as part of this subpart.

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40 CFR 63.3330 (a)

This citation states the compliance dates for existing sources.

40 CFR 63.3330 (b)

This citation states the compliance dates for new sources.

40 CFR 63.3360 (c)

This condition requires the facility to calculate the portion of the coating that is organic hazardous air pollutants and spells out which methods are allowable to calculate the content. This condition will ensure that the facility is calculating their emissions of organic HAP in a consistent and easily understandable manner when determining whether they are meeting the emission limits in this subpart.

40 CFR 63.3360 (d)

This citation states the compliance procedures for determining volatile organic and coating solids content.

40 CFR 63.3370 (b)

This citation states the procedures to demonstrate with the as-purchased compliant coating materials option.

40 CFR 63.3370 (c)

This citation states the procedures for demonstrating compliance with the as-applied compliant coating materials option.

40 CFR 63.3370 (c) (5)

This citation states the mass emission limit for as-applied coating materials.

40 CFR 63.3400 (c) (1)

This condition requires that the facility submit semi-annual compliance reports in order to let NYSDEC know whether the facility has been meeting the emission limits contained in this subpart. This condition spells out the dates that the reports are to be submitted by.

40 CFR 63.3400 (c) (2)

This condition spells out the information that needs to be submitted in the semi-annual compliance

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reports that must be submitted in order to show that the facility has been meeting the emission limits contained in this subpart.

40 CFR 63.3410 (a)

This condition spells out which records the facility must keep in order to prove that the facility is meeting the requirements in this subpart. The records need to be kept on a monthly basis and include items such as CEM data, material usage, HAP content, and operating parameter data.

40 CFR 63.7500 (a) (1)

These conditions state what emission limits and management practices affected sources with which the owner or operator must comply

40 CFR 63.7550 (c)

This condition states the requirements for the compliance report

40 CFR 63.7550 (d)

This condition states the requirements for reporting deviations at facilities not using a continuous monitoring system

40 CFR 63.7555 (a)

This condition states what records must be kept

40 CFR 63.7560

This condition states in what form the records must be kept

40 CFR 63.8000 (a)

This citation states the general requirements for compliance with Subpart HHHHH.

40 CFR 63.8000 (b)

This citation states the general requirements for Subpart HHHHH.

40 CFR 63.8055

This citation states how to comply with a weight percent HAP limit in coating products.

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40 CFR 63.820 (b)

This citation states that Subpart KK is not applicable to research or laboratory equipment.

40 CFR 63.821 (a) (3)

This citation states the applicability of stand-alone equipment.

40 CFR 63.821 (c)

This citation states the requirements for product and packaging rotogravure and wide-web flexographic printing affected sources that increase coating usage.

40 CFR 63.825 (b)

This citation states the emission standards for product and packaging rotogravure and wide-web flexographic printing.

40 CFR 63.827 (b) (2)

This citation states the methods to determine organic HAP weight fraction of materials for product and packaging rotogravure or wide-web flexographic printing affected sources.

40 CFR 63.827 (c) (3)

This citation states the option to use formulation data to determine volatile matter weight fraction or solids weight fraction of a material.

40 CFR 63.829 (b) (1)

This citation states that records of all measurements needed to demonstrate compliance must be maintained.

40 CFR 63.830 (b) (6)

This paragraph states the requirements for a semiannual compliance summary report.

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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 201-6.4 (f) (2)

This section describes the requirements for operational flexibility protocols included in Title V permits. The facility owner or operator may make certain changes to the facility that have been reviewed and approved pursuant to the protocol without first obtaining a permit modification for those changes.

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 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 212-2.4 (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 217-3.3

6 NYCRR 227-1.4 (a)

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

6 NYCRR 228-1.1 (a) (3)

This citation dictates that any coating line, which is or becomes subject to the requirements of this regulation, will remain subject to its requirements even if the reason they were subject later falls below the applicability threshold.

6 NYCRR 228-1.1 (b) (9)

6 NYCRR 228-1.10

This citation specifies the procedures and protocols for the handling, storage and disposal of volatile organic compounds.

6 NYCRR 228-1.3 (a)

This citation prohibits owners or operators of emission sources from allowing emissions to the outdoor atmosphere, which reduce the visibility through the atmosphere by 20 percent or greater for any consecutive six-minute period.

6 NYCRR 228-1.3 (c)

This citation prohibits anyone from facilitating in any way the use of a coating in violation of these regulations.

6 NYCRR 228-1.4 (d) (3)

The citation specifies the maximum VOC content of a coating allowed when coating paper, film or foil.

6 NYCRR 228-1.6 (a)

This citation specifies the test methods to be used on samples of coatings collected during their application, to verify compliance with the VOC limit requirements of the regulation.

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6 NYCRR 228-1.6 (c)

This citation permits Department personnel to enter a facility at reasonable hours for the purpose of collecting samples to verify compliance with VOC content limit requirements.

6 NYCRR 228-1.6 (h)

This citation requires the facility owner or operator to divulge any information or record showing noncompliance with the requirements of the regulation to the Department within 30 days and to maintain this information on the premises for a period of 5 years.

6 NYCRR 234.3 (a) (1) (i)

For packaging rotogravure, publication rotogravure or flexographic printing processes that use ink, coating or adhesive containing VOC must use inks that have a VOC content of 0.8 kilograms of VOC per kilogram of solids as applied or 0.16 kilograms of VOC per kilogram of ink, coating or adhesive as applied.

6 NYCRR 234.3 (e) (1) (i) ('a')

This regulation requires that for screen printing processes that uses ink, coating or adhesive containing VOC can use, as a strategy to control VOC a maximum permitted amount of 3.3 pounds of VOC per gallon of ink, coating or adhesives.

6 NYCRR 234.3 (f)

This regulation sets forth the requirements for a RACT demonstration for printing processes that have a lesser degree of control than that specified in Part 234.3.

6 NYCRR 234.4 (b)

This regulation sets forth the testing methods and procedures to be used for facilities subject of the requirements of Part 234.

6 NYCRR 234.6

This regulation specifies the following:

An owner or operator of a facility subject to this Part shall not:

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- (a) Use open containers to store or dispose of cloth or paper impregnated with VOC or solvents that are used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (b) Use open containers to store or dispose of spent or fresh VOC or solvents used for surface preparation, cleanup or the removal of ink, coating or adhesive;
- (c) Use open containers to store, dispose or dispense ink, coating or adhesive unless production, sampling, maintenance or inspection procedures require operational access. This provision does not apply to the actual device or equipment designed for the purposes of applying an ink, coating or adhesive to a substrate.

6 NYCRR 234.7

This regulation sets forth the record keeping requirements for facilities subject of the requirements of Part 234.

6 NYCRR 234.8

This regulation requires that emissions from a unit subject to Part 234 shall not have an opacity greater than 10%.

6 NYCRR Subpart 201-7

This regulation sets forth an emission cap that cannot be exceeded by the facility. In this permit that cap is

Compliance Certification

Summary of monitoring activities at NEENAH NORTHEAST - LOWVILLE:

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

0-00001	65	record keeping/maintenance procedures
0-00001	66	record keeping/maintenance procedures
0-00001	67	record keeping/maintenance procedures
0-00001	68	record keeping/maintenance procedures
0-00001	69	record keeping/maintenance procedures
0-00003/-/031	73	record keeping/maintenance procedures
0-00003/-/031	74	record keeping/maintenance procedures
0-00003/-/031	75	monitoring of process or control device parameters as surrogate
FACILITY	48	work practice involving specific operations

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FACILITY	49	work practice involving specific operations
FACILITY	52	record keeping/maintenance procedures
FACILITY	53	record keeping/maintenance procedures
FACILITY	54	work practice involving specific operations
FACILITY	55	record keeping/maintenance procedures
FACILITY	56	record keeping/maintenance procedures
FACILITY	57	work practice involving specific operations
FACILITY	58	record keeping/maintenance procedures
FACILITY	59	record keeping/maintenance procedures
FACILITY	60	record keeping/maintenance procedures
FACILITY	43	record keeping/maintenance procedures
FACILITY	44	work practice involving specific operations
FACILITY	45	record keeping/maintenance procedures
FACILITY	46	record keeping/maintenance procedures
FACILITY	47	record keeping/maintenance procedures
FACILITY	5	record keeping/maintenance procedures
FACILITY	6	record keeping/maintenance procedures
FACILITY	22	record keeping/maintenance procedures
0-00005	76	monitoring of process or control device parameters as surrogate
FACILITY	25	intermittent emission testing
0-00001	64	monitoring of process or control device parameters as surrogate
FACILITY	27	monitoring of process or control device parameters as surrogate
FACILITY	33	record keeping/maintenance procedures
FACILITY	28	monitoring of process or control device parameters as surrogate
0-00005/-/030	77	monitoring of process or control device parameters as surrogate
FACILITY	30	monitoring of process or control device parameters as surrogate
FACILITY	32	record keeping/maintenance procedures
0-00002/-/024	70	work practice involving specific operations
0-00002/-/024	71	work practice involving specific operations
FACILITY	34	record keeping/maintenance procedures
0-00002/-/024	72	record keeping/maintenance procedures
FACILITY	35	record keeping/maintenance procedures
FACILITY	36	record keeping/maintenance procedures
FACILITY	37	monitoring of process or control device parameters as surrogate

Basis for Monitoring

6 NYCRR Part 201-6.4 (c)(3)(ii): Semi-annual reports of any required monitoring must be submitted to the Department. Reports should include any deviations from compliance and any corrective action taken.

6 NYCRR Part 201-6.4(e): This facility is required to submit an annual compliance certification containing various details as specified in the permit.

6 NYCRR Part 201-6.4(f)(2): This condition outlines the facility's Operational Flexibility Protocol which enables the facility to make certain changes pursuant this protocol to the facility's Title V permit. Changes made under the protocol are not subject to the modification provisions of 6 NYCRR Part 201-6.6 unless required by the Department.

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6 NYCRR Part 201-6.5(a): This condition ensures sources will comply with regulations to be promulgated by the Department to ensure greenhouse gas emissions are reduced. The facility has undergone an CLCPA analysis and will continue to explore renewable energy options and will invest in energy reduction activities.

6 NYCRR Part 212-2.4(b): Emission sources not covered or exempted from any other rule are considered process sources per 6 NYCRR Part 212. All process sources regulated under 6 NYCRR Part 212 must operate in a manner as not to exceed the particulate emission rate and opacity limits contained in that rule.

6 NYCRR Part 228: The facility may use up to 55 gallons of non-compliant coatings, or up to 400 lbs of VOC emissions not subject to the requirements of Subpart 228-1 during any 12-month period. The facility must maintain records monthly to demonstrate compliance with this requirement. This facility must also meet the opacity limit of 20 percent at all times. The facility must take regular opacity observations and keep records of all observations in a logbook onsite. This facility must also demonstrate compliance with a VOC content limit of 0.08 pounds of VOC per pound of coating part. The facility must maintain records of VOC content for coatings and solvents used. Lastly, the facility must abide by best practices to minimize the emission of VOC.

6 NYCRR Part 234: This facility operates a graphic arts operation subject to this part. The facility will minimize emissions of VOC by utilizing best practices. The facility may also operate with a lesser degree of control upon approval of a VOC RACT analysis. The facility must also demonstrate compliance with an opacity requirement of 10 percent opacity.

40 CFR 63 Subpart KK: This facility is a major source of HAP emissions and includes affected sources, therefore it is subject to 40 CFR Part 63, Subpart KK. The facility must demonstrate that each ink, coating, varnish, adhesive, primer, and other solids containing material applied during the month contains no more than 0.04 weight fraction organic HAP. The facility may rely on formulation data from the manufacturer of the material to verify this. The facility may also comply by other methods as specified in the rule, but must maintain records of its compliance.

40 CFR 63 Subpart JJJJ: This facility is a major source of HAP emissions and includes affected sources, therefore it is subject to 40 CFR Part 63, Subpart JJJJ. The facility must limit the organic HAP emissions to no more than 4% of the mass of coating materials applied for each month. Further, the facility must limit the organic HAP to no more than 20% of the mass of coating solids applied for each month. This rule allows for several different compliance options for demonstrating consistency with the rule. The facility is also required to submit various compliance reports to demonstrate compliance with the rule.

6 NYCRR Part 227: The boilers on site are considered stationary combustion installations. These sources must meet the opacity standard of 20% except one 6 minute period per hour of not more than 27%.

40 CFR 63 Subpart DDDDD : The facility is a major source of HAP emissions and includes affected sources, therefore it is subject to Subpart DDDDD. The boilers only fire natural gas and

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therefore are subject to the annual tune-up requirements of this rule. The facility will also need to comply with the compliance reports and reporting of this rule.

40 CFR 63 Subpart HHHHHH : Therefore, this facility is subject to the requirements of the regulation citations within Subpart HHHHHH. The facility has elected to comply with a 5 percent weight HAP limit for process vessels that are used to manufacture coatings with a HAP content of less than 0.05 kg/kg of product. This rule allows for the facility to demonstrate compliance via one of several methods. This rule outlines the various ways to demonstrate compliance, required record keeping and notifications.

6 NYCRR Part 201-7: The facility must limit emissions from emission unit 00005 which contains various coaters and printers to no more than 72,000 pounds of VOC emissions per year. The facility will monitor emissions monthly and report on emissions semi-annually. The facility must also maintain supporting documentation to adequately demonstrate compliance with this cap.