



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Permit Under the Environmental Conservation Law (ECL)

ARTICLE 19: AIR POLLUTION CONTROL - TITLE V PERMIT

IDENTIFICATION INFORMATION

Permit Issued To: INTERNATIONAL PAPER CO

6400 POPLAR AVE
MEMPHIS, TN 38197

Facility:

INTERNATIONAL PAPER TICONDEROGA MILL
568 SHORE AIRPORT RD
TICONDEROGA, NY 12883

Authorized Activity By Standard Industrial Classification Code:

2611 - PULP MILLS
2621 - PAPER MILLS EXC BUILDING PAPER

Mod 5 Permit Effective Date: 09/20/2006

Permit Expiration Date: 06/19/2006



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EU=0-PAPER

52 40 6NYCRR 212.3(a): Emissions from existing sources

EU=0-WWTRT

52 42 6NYCRR 212.3(a): Emissions from existing sources

EU=B-PLANT

53 43 6NYCRR 212.3(a): Emissions from existing sources

53 44 40CFR 63.445(b), Subpart S: Bleaching Systems - Closed-vent System and Control Device Requirements

53 45 40CFR 63.445(c)(2), Subpart S: Compliance Certification

54 4-1 40CFR 63.450(d), Subpart S: Compliance Certification

EU=B-PLANT,EP=00004,Proc=116

55 2-6 6NYCRR 212.11(b)(5): Compliance Certification

56 2-7 6NYCRR 212.11(b)(5): Compliance Certification

EU=P-OWERH

57 2-8 6NYCRR 204-2.1: Submissions to the Department.

57 2-9 6NYCRR 204-4.1: Content of reports and compliance certifications.

58 2-10 6NYCRR 204-7.1: Submission of NOx allowance transfers.

58 2-11 6NYCRR 204-8.1: General provisions.

58 2-12 6NYCRR 204-8.1: Prohibitions.

59 2-13 6NYCRR 204-8.1: Requirements for installation, certification, and data accounting.

60 2-14 6NYCRR 204-8.2: Requirements for recertification of monitoring systems.

60 2-15 6NYCRR 204-8.3: Out of control periods.

60 2-16 6NYCRR 204-8.4: Compliance Certification

62 2-17 6NYCRR 204-8.7: Compliance Certification

62 49 6NYCRR 225-1.7(c): Compliance Certification

63 50 6NYCRR 225-1.7(e): Compliance Certification

64 3-12 6NYCRR 225-2.3(b)(1): Compliance Certification

65 3-13 6NYCRR 227-1.2: Compliance Certification

66 3-14 6NYCRR 227-1.2(a)(3): Compliance Certification

66 4-2 6NYCRR 227-2.4(a): Compliance Certification

EU=P-OWERH,Proc=111,ES=10044

67 1-4 40CFR 63.443(d), Subpart S: Compliance Certification

EU=P-OWERH,Proc=TDF

68 5-16 6NYCRR 200.6: Compliance Certification

68 5-17 6NYCRR 200.6: Compliance Certification

69 5-18 6NYCRR 200.6: Compliance Certification

70 5-19 6NYCRR 200.6: Compliance Certification

70 5-20 6NYCRR 200.6: Compliance Certification

71 5-21 6NYCRR 200.6: Compliance Certification



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72 5-22 6NYCRR 227-1.2(a)(3): Compliance Certification

EU=P-OWERH,EP=00044

73 3-16 6NYCRR 227-2.4(a)(2): Compliance Certification
74 3-17 40CFR 52.21(k), Subpart A: Compliance Certification
74 3-18 40CFR 52.21(k), Subpart A: Compliance Certification
75 58 40CFR 52.21(k), Subpart A: Compliance Certification

EU=P-ULPIN

76 62 40CFR 63.443(d), Subpart S: Compliance Certification
77 2-18 40CFR 63.446(c)(3), Subpart S: Compliance Certification
78 3-19 40CFR 63.450(d), Subpart S: Compliance Certification

EU=R-CAUST

79 66 40CFR 60.116b, NSPS Subpart Kb: Compliance Certification

EU=R-CAUST,Proc=115

80 3-20 6NYCRR 212.3: Compliance Certification
80 68 6NYCRR 212.3: Compliance Certification
81 2-20 6NYCRR 212.10: Compliance Certification

EU=R-CAUST,Proc=115,ES=10005

82 3-21 6NYCRR 225-2.3(b)(1): Compliance Certification

EU=R-CAUST,Proc=115,ES=10077

83 1-7 6NYCRR 212.11(b)(5): Compliance Certification
84 3-22 40CFR 63.864(k), Subpart MM: Compliance Certification
84 3-23 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-CAUST,EP=00005

85 3-24 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification

EU=R-ECOV B

86 4-3 6NYCRR 212.3: Compliance Certification
87 3-26 6NYCRR 212.3: Compliance Certification

EU=R-ECOV B,Proc=103,ES=10001

87 3-27 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification
88 3-28 40CFR 63.864(d), Subpart MM: Compliance Certification
89 3-29 40CFR 63.864(k), Subpart MM: Compliance Certification
90 3-30 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-ECOV B,Proc=105,ES=10003

90 3-31 40CFR 63.862(a)(ii), Subpart MM: Compliance Certification



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EU=R-ECOV,Proc=105,ES=10102

- 91 4-4 40CFR 63.864(k), Subpart MM: Compliance Certification
- 92 4-5 40CFR 63.864(k), Subpart MM: Compliance Certification

EU=R-ECOV,EP=00001,Proc=103,ES=10001

- 92 75 6NYCRR 212.4: Compliance Certification
- 93 76 6NYCRR 212.4: Compliance Certification
- 94 77 6NYCRR 212.10: Compliance Certification

EU=R-ECOV,EP=00001,Proc=104,ES=10001

- 94 78 6NYCRR 212.4: Compliance Certification

EU=R-ECOV,EP=00003

- 95 79 6NYCRR 212.3(b): Compliance Certification

STATE ONLY ENFORCEABLE CONDITIONS

Facility Level

- 97 2-24 ECL 19-0301: Contaminant List
- 98 2-25 6NYCRR 201-1.4: Unavoidable noncompliance and violations
- 99 84 6NYCRR 211.2: Air pollution prohibited

Emission Unit Level

EU=P-OWERH

- 99 3-34 6NYCRR 237-1.4(c)(1): Compliance Demonstration



FEDERALLY ENFORCEABLE CONDITIONS

**** Facility Level ****

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

The items listed below are not subject to the annual compliance certification requirements under Title V. Permittees may also have other obligations under regulations of general applicability.

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought 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 and/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;

(3) During the period of the emergency the facility owner and/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 and/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 and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

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

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 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 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.



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Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(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 D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(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 E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(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 F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(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 G: Cessation or Reduction of Permitted Activity Not a Defense - 6 NYCRR Part 201-6.5(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 H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

This permit does not convey any property rights of any sort or any exclusive privilege.

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Item I: Severability - 6 NYCRR Part 201-6.5(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 J: Permit Shield - 6 NYCRR Part 201-6.5(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 K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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



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- 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 201-6.7 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 L: 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



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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 M: 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.

MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT TO ANNUAL CERTIFICATIONS AT ALL TIMES

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements at all times.

Condition 5-1: Acceptable Ambient Air Quality
Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-1.1:

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

Condition 5-2: Fees
Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(7)

Item 5-2.1:

The owner and/or operator of a stationary source shall pay fees to the Department consistent with the fee schedule authorized by ECL 72-0302.

Condition 2-1: Recordkeeping and reporting of compliance monitoring
Effective between the dates of 01/27/2003 and 06/19/2006



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Applicable Federal Requirement: 6NYCRR 201-6.5(c)

Item 2-1.1:

The following information must be included in any required compliance monitoring records and reports:

- (i) The date, place, and time of sampling or measurements;
- (ii) The date(s) analyses were performed;
- (iii) The company or entity that performed the analyses;
- (iv) The analytical techniques or methods used including quality assurance and quality control procedures if required;
- (v) The results of such analyses including quality assurance data where required; and
- (vi) The operating conditions as existing at the time of sampling or measurement.

Any deviation from permit requirements must be clearly identified in all records and reports. Reports must be certified by a responsible official, consistent with Section 201-6.3 of this Part 201.

**Condition 2-2: Monitoring, Related Recordkeeping, and Reporting Requirements.
Effective between the dates of 01/27/2003 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(2)

Item 2-2.1:

Compliance monitoring and recordkeeping shall be conducted according to the terms and conditions contained in this permit and shall follow all quality assurance requirements found in applicable regulations. Records of all monitoring data and support information must be retained for a period of at least 5 years from the date of the monitoring, sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

**Condition 3-1: Compliance Certification
Effective between the dates of 12/15/2004 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 201-6.5(c)(3)(ii)

Item 3-1.1:

The Compliance Certification activity will be performed for the Facility.

Item 3-1.2:

Compliance Certification shall include the following monitoring:

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Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

To meet the requirements of this facility permit with respect to reporting, the permittee must:

Submit reports of any required monitoring at a minimum frequency of every 6 months, based on a calendar year reporting schedule. These reports shall be submitted to the Department within 30 days after the end of a reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by the responsible official for this facility.

Notify the Department and report permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations shall be submitted to the permitting authority based on the following schedule:

(1) For emissions of a hazardous air pollutant (as identified in an applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.

(2) For emissions of any regulated air pollutant, excluding those listed in paragraph (1) of this section, that continue for more than two hours in excess of permit requirements, the report must be made within 48 hours.

(3) For all other deviations from permit requirements, the report shall be contained in the 6 month monitoring report required above.

(4) This permit may contain a more stringent reporting requirement than required by paragraphs (1), (2) or (3) above. If more stringent reporting requirements have been placed in this permit or exist in applicable requirements that apply to this facility, the more stringent reporting requirement shall apply.

If above paragraphs (1) or (2) are met, the source must notify the permitting authority by telephone during normal business hours at the



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Regional Office of jurisdiction for this permit, attention Regional Air Pollution Control Engineer (RAPCE) according to the timetable listed in paragraphs (1) and (2) of this section. For deviations and incidences that must be reported outside of normal business hours, on weekends, or holidays, the DEC Spill Hotline phone number at 1-800-457-7362 shall be used. A written notice, certified by a responsible official consistent with 6 NYCRR Part 201-6.3(d)(12), must be submitted within 10 working days of an occurrence for deviations reported under (1) and (2). All deviations reported under paragraphs (1) and (2) of this section must also be identified in the 6 month monitoring report required above.

The provisions of 6 NYCRR 201-1.4 shall apply if the permittee seeks to have a violation excused unless otherwise limited by regulation. In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets. Notwithstanding any recordkeeping and reporting requirements in 6 NYCRR 201-1.4, reports of any deviations shall not be on a less frequent basis than the reporting periods described in paragraphs (1) and (4) above.

In the case of any condition contained in this permit with a reporting requirement of "Upon request by regulatory agency" the permittee shall include in the semiannual report, a statement for each such condition that the monitoring or recordkeeping was performed as required or requested and a listing of all instances of deviations from these requirements.

In the case of any emission testing performed during the previous six month reporting period, either due to a request by the Department, EPA, or a regulatory requirement, the permittee shall include in the semiannual report a summary of the testing results and shall indicate whether or not the Department or EPA has approved the results.

All semiannual reports shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Mailing addresses for the above referenced persons are contained in the monitoring condition for 6 NYCRR Part 201-6.5(e), contained elsewhere in this permit.

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-2: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(e)

Item 3-2.1:

The Compliance Certification activity will be performed for the Facility.

Item 3-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Requirements for compliance certifications with terms and conditions contained in this facility permit include the following:

i. Compliance certifications shall contain:

- the identification of each term or condition of the permit that is the basis of the certification;
- the compliance status;
- whether compliance was continuous or intermittent;
- the method(s) used for determining the compliance status of the facility, currently and over the reporting period consistent with the monitoring and related recordkeeping and reporting requirements of this permit;
- such other facts as the Department may require to determine the compliance status of the facility as specified in any special permit terms or conditions; and
- such additional requirements as may be specified elsewhere in this permit related to compliance certification.

ii. The responsible official must include in the annual certification report all terms and conditions contained in this permit which are identified as being subject to certification, including emission limitations, standards, or work practices. That is, the provisions labeled herein as "Compliance Certification" are not the only provisions of this permit for which an annual certification is required.

iii. Compliance certifications shall be submitted annually.

Certification reports are due 30 days after the anniversary date of four consecutive calendar quarters. The first report is due 30 days after the calendar quarter that occurs just prior to the permit



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anniversary date, unless another quarter has been acceptable by the Department.

iv. All compliance certifications shall be submitted to the Administrator (or his or her representative) as well as two copies to the Department (one copy to the regional air pollution control engineer (RAPCE) in the regional office and one copy to the Bureau of Quality Assurance (BQA) in the DEC central office). Please send annual compliance certifications to Chief of the Stationary Source Compliance Section, the Region 2 EPA representative for the Administrator, at the following address:

USEPA Region 2
Air Compliance Branch
290 Broadway
New York, NY 10007-1866

The address for the RAPCE is as follows:

Region 5 Suboffice
232 Hudson Street
P.O. Box 220
Warrensburg, NY 12885-0220

The address for the BQA is as follows:

NYSDEC
Bureau of Quality Assurance
625 Broadway
Albany, NY 12233-3258

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2002.

Subsequent reports are due on the same day each year

Condition 29: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 202-2.1

Item 29.1:

The Compliance Certification activity will be performed for the Facility.

Item 29.2:



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Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

Monitoring Frequency: ANNUALLY

Reporting Requirements: ANNUALLY (CALENDAR)

Reports due by April 15th for previous calendar year

Condition 30: Recordkeeping requirements

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 202-2.5

Item 30.1:

(a) The following records shall be maintained for at least five years:

- (1) a copy of each emission statement submitted to the department; and
- (2) records indicating how the information submitted in the emission statement was determined, including any calculations, data, measurements, and estimates used.

(b) These records shall be made available at the facility to the representatives of the department upon request during normal business hours.

Condition 5-3: Open Fires Prohibited at Industrial and Commercial Sites

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 215

Item 5-3.1:

No person shall burn, cause, suffer, allow or permit the burning in an open fire of garbage, refuse, rubbish for salvage, or rubbish generated by industrial or commercial activities.

**MANDATORY FEDERALLY ENFORCEABLE PERMIT CONDITIONS SUBJECT
TO ANNUAL CERTIFICATIONS ONLY IF APPLICABLE**

The following federally enforceable permit conditions are mandatory for all Title V permits and are subject to annual compliance certification requirements only if effectuated during the reporting period. [NOTE: The corresponding annual compliance certification for those conditions not effectuated during the reporting period shall be specified as "not applicable".]



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Condition 5-4: Maintenance of Equipment
Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.7

Item 5-4.1:

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

Condition 5-5: Recycling and Salvage
Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-1.7

Item 5-5.1:

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

Condition 5-6: Prohibition of Reintroduction of Collected Contaminants to the air
Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-1.8

Item 5-6.1:

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

Condition 5-7: Exempt Sources - Proof of Eligibility
Effective between the dates of 09/20/2006 and 06/19/2006

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

Item 5-7.1:

The owner and/or operator of an emission source or unit that is eligible to be exempt may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 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.

Condition 5-8: Trivial Sources - Proof of Eligibility



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Effective between the dates of 09/20/2006 and 06/19/2006

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

Item 5-8.1:

The owner and/or operator of an emission source or unit that is listed as being trivial in this Part may be required to certify that it operates within the specific criteria described in this Subpart. The owner or operator of any such emission source must maintain all required records on-site for a period of five years and make them available to representatives of the department upon request. Department representatives must be granted access to any facility which contains emission sources or units subject to 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.

Condition 5-9: Standard Requirement - Provide Information

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(4)

Item 5-9.1:

The owner and/or operator shall furnish to the department, within a reasonable time, any information that the department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the department copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality, if the administrator initiated the request for information or otherwise has need of it.

Condition 5-10: General Condition - Right to Inspect

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(a)(8)

Item 5-10.1:

The department or an authorized representative shall be allowed upon presentation of credentials and other documents as may be required by law to:

(i) enter upon the permittee's premises where a facility subject to the permitting requirements of this Subpart is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(ii) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(iii) inspect at reasonable times any emission sources, equipment (including monitoring and air pollution control equipment), practices, and operations regulated or required under the permit; and



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(iv) sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

Condition 5-11: Standard Requirements - Progress Reports

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(d)(5)

Item 5-11.1:

Progress reports consistent with an applicable schedule of compliance are to be submitted at least semiannually, or at a more frequent period if specified in the applicable requirement or by the department. Such progress reports shall contain the following:

(i) dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Condition 5-12: Off Permit Changes

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(f)(6)

Item 5-12.1:

No permit revision will be required for operating changes that contravene an express permit term, provided that such changes would not violate applicable requirements as defined under this Part or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting, or compliance certification permit terms and conditions. Such changes may be made without requiring a permit revision, if the changes are not modifications under any provision of title I of the act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions) provided that the facility provides the administrator and the department with written notification as required below in advance of the proposed changes within a minimum of seven days. The facility owner or operator, and the department shall attach each such notice to their copy of the relevant permit.

(i) For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(ii) The permit shield described in section 6 NYCRR 201-6.6 shall not apply to any change made pursuant to this paragraph.

Condition 5-13: Required Emissions Tests

Effective between the dates of 09/20/2006 and 06/19/2006



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Applicable Federal Requirement: 6NYCRR 202-1.1

Item 5-13.1:

For the purpose of ascertaining compliance or non-compliance with any air pollution control code, rule or regulation, the commissioner may require the person who owns such air contamination source to submit an acceptable report of measured emissions within a stated time. Such person shall bear the cost of measurement and preparing the report of measured emissions. Failure of such person to submit a report acceptable to the commissioner within the time stated shall be sufficient reason for the commissioner to suspend or deny a certificate to operate.

Condition 5-14: Visible Emissions Limited

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 211.3

Item 5-14.1:

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

Condition 3-10: Accidental release provisions.

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 68

Item 3-10.1:

If a chemical is listed in Tables 1,2,3 or 4 of 40 CFR §68.130 is present in a process in quantities greater than the threshold quantity listed in Tables 1,2,3 or 4, the following requirements will apply:

- a) The owner or operator shall comply with the provisions of 40 CFR Part 68 and;
- b) The owner or operator shall submit at the time of permit issuance (if not previously submitted) one of the following, if such quantities are present:
 - 1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR §68.10(a) or,
 - 2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan. Information should be submitted to:

Risk Management Plan Reporting Center
C/O CSC
8400 Corporate Dr
Carrollton, Md. 20785



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Condition 5-15: Recycling and Emissions Reduction

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 40CFR 82, Subpart F

Item 5-15.1:

The permittee shall comply with all applicable provisions of 40 CFR Part 82.

The following conditions are subject to annual compliance certification requirements for Title V permits only.

Condition 24: Emission Unit Definition

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6

Item 24.1(From Mod 5):

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

Emission Unit: P-OWERH

Emission Unit Description:

The power boiler is a multi-fuel boiler that fires no. 6 fuel oil, waste fuel type "A", wood residue consisting of bark, wood and sawdust, rejected digester wood knots, primary clarifier fiber and dried secondary biomass for the production of steam and electricity via a turbine generator. In addition, the power boiler is used to treat non-condensable gases (ncgs), which are produced in the pulping and chemical recovery processes, through thermal oxidation. For this modification, the boiler will fire a combination of oil, wood and tire derived fuel during a two week trial and testing period.

It is not an incinerator and incinerator regulations such as 6NYCRR Part 219 and 40CFR61 Subpart E do not apply.

Building(s): 29

Item 24.2(From Mod 1):

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

Emission Unit: 0-PAPER

Emission Unit Description:

Paper mill: the paper mill converts pulp to various finished paper products via the nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper



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production, and finishing.

Building(s): 4
5

Item 24.3(From Mod 1):

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

Emission Unit: 0-WWTRT

Emission Unit Description:

Wastewater treatment area source: water treatment: Ticonderoga mill water treatment requirements include process water, potable water, and boiler feedwater. Emissions associated with process and potable water treatment area source: water treatment are considered negligible. Boiler feedwater treatment area source: water treatment consists of filtration to remove suspended solids and demineralization using ion exchange resins to remove dissolved inorganic solids. The process also provides for deaeration and the addition of conditioning chemicals including O2 scavengers, corrosion inhibitors, and hardness binding polymers. Water treatment area source: wastewater treatment plant at the Ticonderoga mill is referred to as the Ross Farm and is located north of the mill property. The process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration, sludge dewatering, and disposal. Process wastewater is collected for treatment from various points in the mill including the power area, pulp mill, paper mill, recausticizing and woodroom. Water treatment area source: wastewater treatment plant effluent is discharged to Lake Champlain.

Building(s): 35
T
W

Item 24.4(From Mod 4):

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

Emission Unit: B-PLANT

Emission Unit Description:

Bleach plant area source: The bleach plant whitens brown pulp for writing paper production. Equipment venting to the bleach plant scrubber includes the #10 tower (first bleaching stage), #15 seal pit and washer hood, #35 seal pit and washer hood, #45 seal pit and washer hood, #55 seal pit and washer hood, #30 tower (third bleaching stage), #50 tower (fifth bleaching stage), the chlorine dioxide absorber, the pulp mill acid sewer, the emergency pressure relief hatches from two chlorine dioxide generators, and the vents from two chlorine dioxide storage tanks. Processes that do not vent to the bleach plant scrubber include the second bleaching stage (20



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tower) the fourth bleaching stage (40 tower) and four bleach pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Building(s): 6

Item 24.5(From Mod 4):

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

Emission Unit: P-ULPIN

Emission Unit Description:

This emission unit contains the kraft pulping digester system, evaporator system, knotter system, decker system and pulp washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for inorganic chemical recovery in the recovery boiler. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA. The digester system includes a continuous digester, two flash tanks, 4 flash steam condensers, two blow tanks, a chip bin feeder, a low pressure feeder, and a digester acid wash tank. In addition, the digester system will also include a pulping process condensate collection tank. Currently, non-condensable gases (ncg) are collected from all components of the digester system, except the low pressure feeder, for thermal oxidation in the power boiler. The low pressure feeder vents to the atmosphere only during digester start-up and shut-down. The evaporator system includes a six-effect evaporator, two concentrators, 2 surface condensers, a hogging ejector for the surface condensers, an air ejector, and evaporator seal tank, and a stripper feed jug. Currently, ncgs are collected from all components except the hogging ejector which is used only during evaporator start-up. The powerhouse black liquor spill tank collects liquor from process upsets, such as evaporator upsets, for use after the process stabilizes. This tank is vented to the HVLC system as part of the NESHAP. The knotter system includes two pressure primary knotters and two secondary knotters. Ncgs from the system are currently collected for thermal oxidation at the secondary knotters. Knots leaving the knotter system are either conveyed pneumatically to the top of the digester for fiber recovery, through a cyclone, or ejected from the pulp mill for disposal or energy recovery. The pulp washing system includes a pressure diffuser, a black liquor dump tank, a black liquor holding tank, a diffuser filtrate tank, two vacuum drum washers, two vacuum drum washer seal tanks, brown stock washers, two brown stock washer seal tanks, and a washed stock storage tank. Ncgs are currently collected from all components except the washed stock storage tank. The primary



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rejects tank and the refined rejects tank vent to the brown stock washers storage tank. Both of these tanks are part of the screen system. The decker system includes two vacuum deckers, a decker white water tank, a decker low density storage tank and a fiber salvage tank. The deckers and the decker low density storage tank are vented to a separate stack. The decker white water tank vents directly to the atmosphere from the tank. This emission unit also includes an unbleached hardwood pulp high density storage tank and an unbleached softwood high density storage tank. Both tanks vent to the atmosphere. The current ncg collection system also collects ncs from various weak and strong black liquor tanks that include two weak liquor tanks, two 50% liquor tanks, sour condensate tank, 2 strong liquor tanks, 2 black liquor soap storage tanks, the evaporater seal tanks, 3 precipitator mix tanks, an economizer liquor mix tank, and a salt cake mix tank. The non-condensable gas system delivers ncs to the power boiler for thermal treatment.

Building(s): 19
29
6

Item 24.6(From Mod 3):

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

Emission Unit: R-CAUST

Emission Unit Description:

Recausticizing area source: the Ticonderoga Mill recausticizing area performs the following tasks: clarifies green liquor from the smelt dissolving tank. - produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers. - clarifies white liquor slurry producing white liquor for use in the digester. - washes, stores and feeds lime mud from the white liquor clarifiers and converts it into "burnt " lime through a process called "calcining" in the lime kiln. Equipment in the recausticizing area includes one green liquor clarifier, two green liquor storage tanks, one lime slaker, three causticizers, 2 white liquor clarifiers, two white liquor storage tanks, one white liquor receiver tank, one sewer clarifier, one mud washer tank, one weak wash storage tank, sodium hydrosulfide storage tank, lime mud mix tank, lime mud storage tank, sewer clarifier filter hood vent, dregs filter hood vent, mud filter hood vent, and vacuum pumps for the sewer clarifier and dregs filters.

Building(s): 19

Item 24.7(From Mod 4):

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



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Emission Unit: R-ECOV8

Emission Unit Description:

The recovery boiler emission unit consists of a kraft recovery furnace and a smelt dissolving tank. The recovery furnace fires black liquor and number 6 oil to produce steam for manufacturing operations and smelt. Smelt (sulfur and sodium chemicals recycled in the draft process) flows from the bottom of the recovery boiler into the smelt dissolving tank to form green liquor. Recovery emissions flow through an electrostatic precipitator. Smelt dissolving tank emissions flow through a wet impact wet scrubber.

Building(s): 29

Item 24.8(From Mod 1):

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

Emission Unit: W-OODYD

Emission Unit Description:

The woodyard processing area provides delivery and storage of wood chips, round wood delivery, debarking, chipping, and chip screening. Wood chips are pneumatically blown to chip piles with 4 chip blowers. Two cyclones in the woodroom receive wood chips blown pneumatically from the chip storage area.

Building(s): 16
48
54
9

Condition 3-3: Compliance Certification
Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 201-6.5(f)

Item 3-3.1:

The Compliance Certification activity will be performed for the Facility.

Item 3-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

I. Protocol Objective

The objective of this condition is to maximize operational flexibility at International Paper Ticonderoga Mill by building into the Title V Permit the capability to make certain changes using a protocol approved by the Department. As provided under 6 NYCRR Part



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201-6.5(f)(2), changes made under an approved protocol are not subject to the Title V permit modification provisions under 6 NYCRR Part 201-6.7.

II. Applicability

A. The following types of changes may be reviewed under this protocol, except as prohibited under II.B below:

1. New emission sources,
2. 6 NYCRR Part 200 "modifications",
3. Emission point relocations, and
4. Changes that otherwise could be handled under the minor permit modification process in 6 NYCRR Part 201-6.7.

B. This protocol does not apply to the following changes:

1. Any project defined as major in 6 NYCRR 621.4(g);
2. Any significant permit modification as that term is defined in 6 NYCRR 201-6.7(d);
3. Any change that would exceed the emissions allowable under the permit whether expressed as a rate or in terms of total emissions.
4. Any change that would require a new federally enforceable cap either to avoid major New Source Review requirements or to address and comply with other Clean Air Act requirements such as RACT.

III. Protocol

A. Criteria

1. Permittee shall evaluate changes reviewed under this protocol in accordance with the following criteria:

a. All underlying federal and state requirements with which the new or changed emission source must comply must exist in the Title V permit. The new or changed source will be associated with an existing emissions unit, process, emission source or emission point that has the necessary regulatory citations. Existing permit conditions may be amended to reference or include the new or changed emission source and any related information, and/or, subject to DEC approval, new conditions proposed, to provide the appropriate monitoring parameters.

b. Any new or changed emission source shall not be part of a source project that results in a significant net emissions increase that exceeds the NSR thresholds identified in 6 NYCRR Part 231-2 or 40 CFR 52.21. Permittee will submit documentation of major NSR program non-applicability for NYSDEC review and approval consistent with the advance notification provisions of Section III.B. below.

B. Notification Requirements for Changes Reviewed under Protocol

1. Permittee shall notify the Department in writing at least 30



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calendar days in advance of making any changes reviewed under the protocol. When the change is to a source subject to an applicable requirement, the EPA Administrator shall be notified in the same manner. Notifications made in accordance with this protocol will include the following documentation:

a. Identification of the Title V permit emission unit, process(es), emission sources, and emission points affected by the proposed change with applicable revisions shown in a revised Emission Unit Matrix;

b. Description of the proposed change;

c. If appropriate, the identification and description of emissions control technology and compliance terms;

d. Documentation of the project's or emission source's compliance with respect to all state and/or federally applicable requirements according to an established procedure which includes the following steps:

i. For new emission sources, identify all contaminants and

calculate

the emission rate potential and maximum projected actual annual emission rates after the proposed change. For changes to existing emission sources, emission rate potential and maximum projected actual annual emission rates shall be provided for all contaminants affected by the change.

ii. Indicate the environmental rating for each contaminant identified in III.B.1.d.i as previously established by the Department or proposed based on the current DAR-1 Ambient Guideline Concentration Table or toxicological review.

iii. Provide the rationale for determining that major NSR does not apply which may include: 1) an explanation that the change is not a source project or modification under 40 CFR 52.21, 2) calculations that demonstrate that the emissions increase from the project alone is not significant or, 3) calculations that demonstrate that the net emissions increase for the contemporaneous period is not significant.

iv. Model facility wide emissions, including emissions from the proposed project, using a model approved in advance by the Department. Maximum projected actual annual emission rates consistent with current permitting will be used in the model.

v. Identify and evaluate the applicability of all regulations likely to be triggered by the new or changed emission source, using the emissions information, environmental ratings, modeling results and knowledge of operations.

e. Any other relevant information used for the evaluation of the proposed project or emission source under the Protocol.

C. Review and Approval of Changes



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1. Permittee will be permitted to proceed with the change 30 days from the Department's receipt of the notification and/or additional information upon prior Departmental approval, whichever is first, unless the Department determines that a more detailed review or a permit modification is required.
2. The Department may require a permit modification, in order to impose new applicable requirements or additional permit conditions if it determines that changes proposed pursuant to notification do not meet the criteria under III.A or that the change may have a significant air quality impact or be otherwise potentially significant under SEQRA (6NYCRR Part 617).
3. The Department may require that the permittee not undertake the proposed change until the Department completes a more detailed review of the proposed change, which may include potential air quality impacts and/or applicable requirements. The Department's determination shall include a listing of information required for further review, if necessary.
4. The Department shall respond to the permittee in writing with a determination under #2 or 3 above within 15 days of receipt of the notification and/or additional information from the permittee.

D. Additional Compliance Obligations for Changes Made Under this Protocol

1. Upon commencement of the change, permittee shall comply with all applicable requirements and permit conditions, including any amended or proposed in accordance with III.A.1.a above.
2. Permittee shall provide with the semi-annual monitoring report, a summary of the changes made in accordance with this protocol during the corresponding period and a statement of the compliance status of each.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 27: Non Applicable requirements
Effective between the dates of 06/20/2001 and 06/19/2006



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Applicable Federal Requirement: 6NYCRR 201-6.5(g)

Item 27.1:

This section contains a summary of those requirements that have been specifically identified as being not applicable to this facility and/or emission units, emission points, processes and/or emission sources within this facility. The summary also includes a justification for classifying any such requirements as non-applicable.

6NYCRR 225-1.7

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source.

Fuel oil contributes less than 10% of the heat input to the boiler.

6NYCRR 227-1

Emission Unit: RECOVB

Reason: The recovery boiler is a process source - not a combustion source.

Fuel oil contributes less than 10% of the heat input of the boiler.

Condition 1-1: Compliance Certification

Effective between the dates of 11/21/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.6(a)

Replaces Condition(s) 41, 61, 65, 80

Item 1-1.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: 0-PAPER

Emission Unit: P-ULPIN

Emission Unit: R-CAUST

Emission Unit: W-OODYD

Item 1-1.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

No person will cause or allow emissions having an average opacity during any 6 consecutive minutes of 20 percent or greater from any process emission source, except only the emission of uncombined water.

The Department reserves the right to perform or require the



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performance of a method 9 opacity evaluation at any time during facility operation.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: EPA Method 9

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 33: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006

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

Item 33.1:

The Compliance Certification activity will be performed for the Facility.

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 33.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

The sulfur content of the number 6 fuel oil fired shall not exceed 1.5% by weight. Compliance with this requirement shall be documented through the fuel supplier certification for each shipment of oil received.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: NUMBER 6 OIL

Parameter Monitored: SULFUR CONTENT

Upper Permit Limit: 1.5 percent by weight

Monitoring Frequency: PER DELIVERY

Averaging Method: MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME
(INSTANTANEOUS/DISCRETE OR GRAB)

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.

Subsequent reports are due every 6 calendar month(s).

Condition 34: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006



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Facility DEC ID: 5154800008

Applicable Federal Requirement: 6NYCRR 225-2.7

Item 34.1:

The Compliance Certification activity will be performed for the Facility.

Item 34.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Any person delivering waste fuel A to a facility burning such waste fuel, must perform analyses or adopt procedures to assure compliance with Table 2-1 of section 225-2.4 of this Subpart prior to delivery. Sampling and analysis of waste fuel samples must be carried out in accordance with methods acceptable to the commissioner. A list of acceptable methods may be obtained from any office of the Department of Environmental Conservation.

Any person delivering waste fuel to a facility must maintain records of the identification and quantity of all waste fuel delivered to that facility and report such information to the owner of that facility.

The facility must maintain and retain records pursuant to this section and make such records available for inspection by the commissioner or his representative upon request.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.

Subsequent reports are due every 6 calendar month(s).

**Condition 3-4: § 63.10(b) General Recordkeeping Requirements
Effective between the dates of 12/15/2004 and 06/19/2006**

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 3-4.1:

The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. At a minimum the most recent 2 years of data shall be retained on site. The owner or operator of an affected source subject to the provisions of this part shall maintain relevant records for such source as described in 40 CFR 63.10 (b)(2).

**Condition 3-5: §63.10(d) General Reporting Requirements
Effective between the dates of 12/15/2004 and 06/19/2006**



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 3-5.1:

The owner or operator of an affected source subject to the reporting requirements under the general provisions shall submit reports to the Department in accordance with the reporting requirements in the relevant standards as described in 40 CFR 63.10 (d).

Condition 3-6: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.10, Subpart A

Item 3-6.1:

The Compliance Certification activity will be performed for the Facility.

Item 3-6.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

A summary report shall be submitted for the hazardous air pollutants monitored at each affected source. The summary report shall be entitled "Summary Report-Gaseous and Opacity Excess Emission and Continuous Monitoring System Performance" and contain the information specified in 40CFR63.10(e)(3)(vi). A combined report may be submitted for Subpart S and Subpart MM requirements.

If the total duration of excess emissions or control system parameter exceedances for the reporting period is 1 % or greater of the total operating time for the reporting period, or the total CMS downtime for the reporting period is 5% or greater of the total operating time for the reporting period, both this summary report and the excess emissions and continuous monitoring system performance report shall be submitted.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-7: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.454(b), Subpart S



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 3-7.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: B-PLANT

Emission Unit: P-ULPIN

Item 3-7.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic or pictures of the components of applicable affected equipment and shall record the following information for each monthly inspection:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) Results of negative pressure tests for enclosures;
- (4) Results of leak detection tests;
- (5) The nature of the defect or leak and the method of detection;
- (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
- (7) Repair methods applied in each attempt to repair the leak or defect;
- (8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
- (9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
- (10) The date of successful repair of the leak or defect;
- (11) The position and duration of opening of bypass line valves and the condition of any valve seals; and
- (12) The duration of the use of bypass valves on computer controlled valves.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-8: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Applicable Federal Requirement: 40CFR 63, Subpart MM

Item 3-8.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10005

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10003

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10001

Item 3-8.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator must develop and implement a written plan that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan must include the requirements in paragraphs 40CFR63.866(a)

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-9: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(e)(10), Subpart MM

Item 3-9.1:

The Compliance Certification activity will be performed for the facility:

The Compliance Certification applies to:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Emission Unit: R-ECOV B



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Process: 105

Emission Source: 10102

Item 3-9.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operators of a smelt dissolving tank or lime kiln equipped with a wet scrubber must install, calibrate, maintain and operate a CPMS that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

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

**Condition 36: Emission Point Definition By Emission Unit
Effective between the dates of 06/20/2001 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 201-6

Item 36.1(From Mod 5):

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

Emission Unit: P-OWERH

Emission Point: 00044

Height (ft.): 205

Diameter (in.): 162

NYTMN (km.): 4860.223

NYTME (km.): 629.031

Item 36.2(From Mod 0):

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

Emission Unit: 0-HESSB

Emission Point: 00029

Height (ft.): 26

Diameter (in.): 24

NYTMN (km.): 4860.223

NYTME (km.): 629.031

Emission Point: 00030



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Height (ft.): 26 Diameter (in.): 24
NYTMN (km.): 4860.223 NYTME (km.): 629.031

Item 36.3(From Mod 0):

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

Emission Unit: 0-PAPER

Emission Point: 00041

Height (ft.): 25 Diameter (in.): 6
NYTMN (km.): 4860. NYTME (km.): 629.

Emission Point: 00047

Height (ft.): 9 Diameter (in.): 62
Building: 4

Emission Point: 00048

Height (ft.): 9 Diameter (in.): 62
Building: 4

Emission Point: 00049

Height (ft.): 11 Diameter (in.): 62
Building: 4

Emission Point: 00050

Height (ft.): 59 Diameter (in.): 60
Building: 4

Emission Point: 00051

Height (ft.): 75 Diameter (in.): 24
Building: 4

Emission Point: 00052

Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00053

Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00054

Height (ft.): 80 Length (in.): 59 Width (in.): 39
Building: 4

Emission Point: 00055

Height (ft.): 83 Diameter (in.): 58



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Facility DEC ID: 5154800008

Emission Point: 00056 Height (ft.): 83	Diameter (in.): 62	Building: 4
Emission Point: 00057 Height (ft.): 79	Diameter (in.): 62	Building: 4
Emission Point: 00058 Height (ft.): 80	Diameter (in.): 72	Building: 4
Emission Point: 00059 Height (ft.): 60	Diameter (in.): 36	Building: 4
Emission Point: 00060 Height (ft.): 81	Diameter (in.): 36	Building: 4
Emission Point: 00061 Height (ft.): 80	Length (in.): 58	Width (in.): 43 Building: 4
Emission Point: 00062 Height (ft.): 80	Diameter (in.): 59	Building: 4
Emission Point: 00063 Height (ft.): 80	Diameter (in.): 59	Building: 4
Emission Point: 00064 Height (ft.): 81	Diameter (in.): 50	Building: 4
Emission Point: 00065 Height (ft.): 81	Length (in.): 60	Width (in.): 50 Building: 4
Emission Point: 00066 Height (ft.): 81	Length (in.): 60	Width (in.): 50 Building: 4



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00067

Height (ft.): 80

Diameter (in.): 60

Building: 4

Item 36.4(From Mod 0):

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

Emission Unit: 0-WWTRT

Emission Point: 00031

Height (ft.): 25

NYTMN (km.): 4860.

Length (in.): 60

NYTME (km.): 629.

Width (in.): 24

Emission Point: 00035

Height (ft.): 24

NYTMN (km.): 4860.

Diameter (in.): 36

NYTME (km.): 629.

Emission Point: 00046

Height (ft.): 36

NYTMN (km.): 4860.

Diameter (in.): 4

NYTME (km.): 629.

Item 36.5(From Mod 2):

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

Emission Unit: B-PLANT

Emission Point: 00004

Height (ft.): 136

NYTMN (km.): 4860.

Diameter (in.): 42

NYTME (km.): 629.

Emission Point: 00078

Height (ft.): 91

Diameter (in.): 36

Building: 6

Emission Point: 00079

Height (ft.): 91

Diameter (in.): 36

Building: 6

Emission Point: 00080

Height (ft.): 91

Diameter (in.): 46

Building: 6

Emission Point: 00081

Height (ft.): 91

Diameter (in.): 46

Building: 6



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emission Point: 00082
Height (ft.): 91 Diameter (in.): 48
Building: 6

Emission Point: 00083
Height (ft.): 91 Diameter (in.): 83
Building: 6

Item 36.6(From Mod 0):

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

Emission Unit: P-ULPIN

Emission Point: 00084
Height (ft.): 81 Diameter (in.): 49
Building: 6

Emission Point: 00085
Height (ft.): 91 Diameter (in.): 60
Building: 6

Emission Point: 00086
Height (ft.): 35 Diameter (in.): 43
Building: 6

Emission Point: 00088
Height (ft.): 91 Diameter (in.): 6
Building: 6

Emission Point: 00089
Height (ft.): 68 Diameter (in.): 18
Building: 29

Emission Point: 00090
Height (ft.): 25 Diameter (in.): 12
Building: 6

Emission Point: 00091
Height (ft.): 68 Diameter (in.): 24
Building: 29

Emission Point: 00100
Height (ft.): 25 Length (in.): 36 Width (in.): 38
Building: 6

Emission Point: 00105



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Facility DEC ID: 5154800008

Height (ft.): 136	Diameter (in.): 22	Building: 6
Emission Point: 00106		
Height (ft.): 201	Diameter (in.): 56	Building: 29
Emission Point: 00107		
Height (ft.): 102	Diameter (in.): 30	Building: 6

Item 36.7(From Mod 3):

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

Emission Unit: R-CAUST		
Emission Point: 00005		
Height (ft.): 80	Diameter (in.): 54	
NYTMN (km.): 4860.67	NYTME (km.): 628.809	
Emission Point: 00006		
Height (ft.): 47	Diameter (in.): 18	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00008		
Height (ft.): 40	Diameter (in.): 12	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00018		
Height (ft.): 37	Diameter (in.): 6	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00019		
Height (ft.): 31	Diameter (in.): 6	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00020		
Height (ft.): 36	Diameter (in.): 6	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00034		
Height (ft.): 40	Diameter (in.): 18	
NYTMN (km.): 4860.223	NYTME (km.): 629.031	
Emission Point: 00043		
Height (ft.): 40	Diameter (in.): 6	



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Facility DEC ID: 5154800008

NYTMN (km.): 4860.223 NYTME (km.): 629.031

Emission Point: 00108 Height (ft.): 33	Diameter (in.): 12	Building: 19
Emission Point: 00109 Height (ft.): 35	Diameter (in.): 7	Building: 19
Emission Point: 00113 Height (ft.): 37	Diameter (in.): 6	
Emission Point: 00114 Height (ft.): 30	Diameter (in.): 36	
Emission Point: 00115 Height (ft.): 32	Diameter (in.): 24	Building: 19
Emission Point: 00116 Height (ft.): 31	Diameter (in.): 18	Building: 19
Emission Point: 00117 Height (ft.): 31	Diameter (in.): 18	Building: 19
Emission Point: 00118 Height (ft.): 30	Diameter (in.): 8	Building: 19
Emission Point: 00119 Height (ft.): 10	Diameter (in.): 8	Building: 19
Emission Point: 00120 Height (ft.): 12	Diameter (in.): 7	Building: 19
Emission Point: 00121 Height (ft.): 35	Diameter (in.): 7	Building: 19
Emission Point: 00123 Height (ft.): 39	Length (in.): 1	Width (in.): 3



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Facility DEC ID: 5154800008

Building: 19

Emission Point: 00124
Height (ft.): 25

Diameter (in.): 36

Building: 19

Item 36.8(From Mod 3):

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

Emission Unit: R-ECOV B

Emission Point: 00001

Height (ft.): 200

Diameter (in.): 74

NYTMN (km.): 4860.815

NYTME (km.): 628.745

Building: 29

Emission Point: 00003

Height (ft.): 169

Diameter (in.): 42

NYTMN (km.): 4860.799

NYTME (km.): 628.718

Emission Point: 00103

Height (ft.): 200

Diameter (in.): 74

NYTMN (km.): 4860.842

NYTME (km.): 628.765

Building: 29

Item 36.9(From Mod 0):

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

Emission Unit: W-OODYD

Emission Point: 00011

Height (ft.): 47

Diameter (in.): 44

NYTMN (km.): 4860.223

NYTME (km.): 629.031

Emission Point: 00017

Height (ft.): 43

Diameter (in.): 29

NYTMN (km.): 4860.223

NYTME (km.): 629.031

Emission Point: 00068

Height (ft.): 35

Diameter (in.): 44

Building: 16

Emission Point: 00069

Height (ft.): 35

Diameter (in.): 44

Building: 54

Emission Point: 00070

Height (ft.): 25

Diameter (in.): 44



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Building: 16

Emission Point: 00071
Height (ft.): 25

Diameter (in.): 17

Building: 54

Emission Point: 00099
Height (ft.): 35

Diameter (in.): 17

Building: 54

**Condition 37: Process Definition By Emission Unit
Effective between the dates of 06/20/2001 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 201-6

Item 37.1(From Mod 5):

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

Emission Unit: P-OWERH

Process: TDF

Source Classification Code: 1-02-009-01

Process Description:

During a 14 day trial and testing period, tire-derived fuel (TDF) will be combusted in the boiler along with number 6 fuel oil and wood.

Alternative fuels (rejected digester knots and secondary biosolids) shall not be burned while TDF is being burned. The TDF loading will not exceed 3 tons per hour and the total heat input to the boiler will not exceed 748 MMBtu per hour. TDF will be added to wood in the woodyard and pneumatically conveyed with the wood to the boiler. During the first week, TDF will be added in gradually increasing amounts while the boiler operators adjust the boiler to achieve optimum combustion conditions. During the second week, extensive stack testing will be performed to characterize emissions.

While the trial period is planned to be accomplished during consecutive days, it is understood that unforeseen conditions may cause delays. If such conditions occur, the trial may be accomplished during 14 days of TDF use over a 21 day period.

Whenever TDF is being burned, facility personnel will monitor the SO2 emission rate, NOX emission rate and stack opacity (during daylight hours). If any of these indicators exceed permit limits, the facility will stop adding TDF until the conditions have stabilized and are in compliance.

During the first week, PM emissions will be measured (using EPA Method 5) at baseline condition and while TDF is added at 1 ton per hour (TPH); 2 TPH; and 3 TPH. If PM emissions exceed 0.10 pounds per MMBtu, the facility will stop adding TDF.



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Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 37.2(From Mod 1):

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

Emission Unit: 0-PAPER

Process: 119

Source Classification Code: 3-07-013-99

Process Description:

The paper mill converts pulp to various finished products via nos. 7 and 8 paper machines. Operations in the paper mill include additive preparation, stock preparation, paper production, and finishing.

Emission Source/Control: 10041 - Process

Emission Source/Control: 10047 - Process

Emission Source/Control: 10048 - Process

Emission Source/Control: 10049 - Process

Emission Source/Control: 10050 - Process

Emission Source/Control: 10051 - Process

Emission Source/Control: 10052 - Process

Emission Source/Control: 10053 - Process

Emission Source/Control: 10054 - Process

Emission Source/Control: 10055 - Process

Emission Source/Control: 10056 - Process

Emission Source/Control: 10057 - Process



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Emission Source/Control: 10058 - Process

Emission Source/Control: 10059 - Process

Emission Source/Control: 10060 - Process

Emission Source/Control: 10061 - Process

Emission Source/Control: 10062 - Process

Emission Source/Control: 10063 - Process

Emission Source/Control: 10064 - Process

Emission Source/Control: 10065 - Process

Emission Source/Control: 10066 - Process

Emission Source/Control: 10067 - Process

Item 37.3(From Mod 1):

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

Emission Unit: 0-WWTRT

Process: 122

Source Classification Code: 3-07-001-21

Process Description:

The wastewater treatment process is a tertiary system consisting of collection, fiber reclaim, clarification, neutralization, aeration and sludge dewatering and disposal.

Emission Source/Control: 10031 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10035 - Process

Emission Source/Control: 10046 - Process

Item 37.4(From Mod 4):

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

Emission Unit: B-PLANT

Process: 116

Source Classification Code: 3-07-001-15

Process Description:

The bleach plant whitens brown pulp for writing paper production.

Emission Source/Control: 10094 - Control



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Control Type: WET SCRUBBER

Emission Source/Control: 10004 - Process

Item 37.5(From Mod 1):

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

Emission Unit: B-PLANT

Process: 117

Source Classification Code: 3-07-001-15

Process Description:

Processes that do not vent to the bleach plant scrubber include: the second bleaching stage (#20 tower), the fourth bleaching stage (#40 tower) and four bleached pulp storage tanks (#7, #8, #9, and #10 high density storage tanks).

Emission Source/Control: 10078 - Process

Emission Source/Control: 10079 - Process

Emission Source/Control: 10080 - Process

Emission Source/Control: 10081 - Process

Emission Source/Control: 10082 - Process

Emission Source/Control: 10083 - Process

Item 37.6(From Mod 4):

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

Emission Unit: P-OWERH

Process: 106

Source Classification Code: 1-02-004-01

Process Description:

Firing No. 6 fuel oil or waste fuel type "A" in the power boiler.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING



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Item 37.7(From Mod 4):

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

Emission Unit: P-OWERH

Process: 107

Source Classification Code: 1-02-009-02

Process Description:

Firing bark and wood in the power boiler. The bark/wood firing rate shall not exceed 547 wet tons per day.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control

Control Type: SODIUM-ALKALI SCRUBBING

Item 37.8(From Mod 1):

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

Emission Unit: P-OWERH

Process: 108

Source Classification Code: 1-02-009-02

Process Description:

Firing dewatered secondary biosolids in the power boiler. The dewatered secondary biosolids shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) dewatered biosolids homogeneously with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered biosolids fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of dewatered biosolids to the woodyard.

Emission Source/Control: 10044 - Combustion

Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control

Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control

Control Type: FLUE GAS RECIRCULATION



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Facility DEC ID: 5154800008

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 37.9(From Mod 1):

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

Emission Unit: P-OWERH
Process: 109
Source Classification Code: 1-02-009-02
Process Description:
Firing primary clarifier fiber in the power boiler. The dewatered primary clarifier fiber shall be mixed with the wood/bark fuel in the woodyard prior to feeding to the bark hogger according to the following procedure: Mix one front end loader bucket (3 cubic yards) fiber homogenously with a minimum of 30 cubic yards of wood/bark. The total quantity of dewatered primary clarifier fiber fed to the boiler shall not exceed 40 cubic yards per day.

Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 37.10(From Mod 1):

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

Emission Unit: P-OWERH
Process: 111
Source Classification Code: 1-02-007-99
Process Description:
Non-condensable gases (NCGs) recovered by the pulping and chemical recovery processes are treated by thermal oxidation in the power boiler. The NCGs are collected by a network of fans and piping and fed to the power boiler.

Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION



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Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Emission Source/Control: 11075 - Process

Item 37.11(From Mod 1):

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

Emission Unit: P-OWERH

Process: 113

Source Classification Code: 1-02-009-02

Process Description:

Firing rejected digester knots in the power boiler. The knots shall be mixed with the wood/bark fuel in the woodyard, prior to feeding to the bark hogger, according to the following procedure: Mix one front end loader bucket (3 cubic yards) knots homogeneously with a minimum of 30 cubic yards of wood/bark. The total quantity of knots fed to the boiler shall not exceed 40 cubic yards per day. A log shall be maintained on-site which indicates the date and volume of each delivery of knots to the woodyard.

Emission Source/Control: 10044 - Combustion
Design Capacity: 855 million Btu per hour

Emission Source/Control: 10072 - Control
Control Type: MULTIPLE CYCLONE W/O FLY ASH INJECTION

Emission Source/Control: 10073 - Control
Control Type: FLUE GAS RECIRCULATION

Emission Source/Control: 10074 - Control
Control Type: SODIUM-ALKALI SCRUBBING

Item 37.12(From Mod 4):

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

Emission Unit: P-ULPIN

Process: 120

Source Classification Code: 3-07-001-99

Process Description:

This emission unit contains the kraft pulping digester system, evaporator system, knoter system, decker system and pulping and washing system from both the powerhouse and pulp mill. In this emission unit the kraft pulping process is used to produce brown pulp



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from wood chips. In addition, this emission unit contains processes that prepare the spent cooking liquor for inorganic chemical recovery in the recovery boiler. Processes in this emission unit are subject to maximum achievable control technology (MACT) contained in the pulp and paper national emission standards for hazardous air pollutants (NESHAP) promulgated by the USEPA.

Emission Source/Control: 10084 - Process

Emission Source/Control: 10085 - Process

Emission Source/Control: 10086 - Process

Emission Source/Control: 10088 - Process

Emission Source/Control: 10089 - Process

Emission Source/Control: 10090 - Process

Emission Source/Control: 10091 - Process

Emission Source/Control: 10097 - Process

Emission Source/Control: 10100 - Process

Emission Source/Control: 10105 - Process

Emission Source/Control: 10106 - Process

Emission Source/Control: 10107 - Process

Item 37.13(From Mod 1):

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

Emission Unit: P-ULPIN

Process: 124

Source Classification Code: 3-07-001-99

Process Description:

Venting non-condensable gases to the atmosphere from the non-condensable gas collection system.

Emission Source/Control: 10107 - Process

Item 37.14(From Mod 1):

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

Emission Unit: R-CAUST



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Process: 114

Source Classification Code: 3-07-001-22

Process Description:

The recausticizing area clarifies green liquor from the smelt dissolving tank, produces white liquor slurry by reacting clarified green liquor with burnt lime from the kiln and/or purchased lime via slaker and causticizers, and clarifies white liquor slurry producing white liquor for use in the digester.

Emission Source/Control: 10125 - Control
Control Type: WET SCRUBBER

Emission Source/Control: 10006 - Process

Emission Source/Control: 10008 - Process

Emission Source/Control: 10018 - Process

Emission Source/Control: 10019 - Process

Emission Source/Control: 10020 - Process

Emission Source/Control: 10034 - Process

Emission Source/Control: 10043 - Process

Emission Source/Control: 10108 - Process

Emission Source/Control: 10109 - Process

Emission Source/Control: 10110 - Process

Emission Source/Control: 10111 - Process

Emission Source/Control: 10112 - Process

Emission Source/Control: 10113 - Process

Emission Source/Control: 10114 - Process

Emission Source/Control: 10115 - Process

Emission Source/Control: 10116 - Process

Emission Source/Control: 10117 - Process

Emission Source/Control: 10118 - Process



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Emission Source/Control: 10119 - Process

Emission Source/Control: 10120 - Process

Emission Source/Control: 10123 - Process

Emission Source/Control: 10124 - Process

Item 37.15(From Mod 3):

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

Emission Unit: R-CAUST

Process: 115

Source Classification Code: 3-07-001-06

Process Description:

The lime kiln converts lime mud to burnt lime through a process called "calcining".

Emission Source/Control: 10077 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10005 - Process

Item 37.16(From Mod 3):

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

Emission Unit: R-ECOV B

Process: 103

Source Classification Code: 3-07-001-10

Process Description:

Babcock and Wilcox recovery furnace fired on black liquor.

Emission Source/Control: 10101 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10104 - Control

Control Type: ELECTROSTATIC PRECIPITATOR

Emission Source/Control: 10001 - Process

Item 37.17(From Mod 1):

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

Emission Unit: R-ECOV B

Process: 104

Source Classification Code: 1-02-004-01

Process Description:

Babcock and Wilcox recovery furnace fired on 1.5% sulfur #6 fuel oil.



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Emission Source/Control: 10001 - Process

Item 37.18(From Mod 4):

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

Emission Unit: R-ECOV B

Process: 105

Source Classification Code: 3-07-001-05

Process Description:

Smelt dissolving tank where smelt from a recovery boiler is dissolved in weak wash to produce green liquor.

Emission Source/Control: 10102 - Control

Control Type: WET SCRUBBER

Emission Source/Control: 10001 - Process

Emission Source/Control: 10003 - Process

Item 37.19(From Mod 1):

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

Emission Unit: W-OODYD

Process: 101

Source Classification Code: 3-07-008-21

Process Description:

Chips pneumatically blown to chip piles through five discharge points.

Emission Source/Control: 10068 - Process

Emission Source/Control: 10069 - Process

Emission Source/Control: 10070 - Process

Emission Source/Control: 10071 - Process

Emission Source/Control: 10099 - Process

Item 37.20(From Mod 1):

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

Emission Unit: W-OODYD

Process: 102

Source Classification Code: 3-07-008-22

Process Description:

Chips pneumatically blown to woodroom through two cyclones.



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Emission Source/Control: 10011 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 10017 - Control
Control Type: SINGLE CYCLONE

Emission Source/Control: 10068 - Process

Condition 40: Emissions from existing sources
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 40.1:

This Condition applies to Emission Unit: 0-PAPER

Item 40.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 42: Emissions from existing sources
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 42.1:

This Condition applies to Emission Unit: 0-WWTRT

Item 42.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 43: Emissions from existing sources
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3(a)

Item 43.1:

This Condition applies to Emission Unit: B-PLANT

Item 43.2:

No person will cause or allow emissions that violate the requirement specified in Table 2, Table 3, or Table 4 of 6NYCRR Part 212 for the environmental rating issued by the commissioner.

Condition 44: Bleaching Systems - Closed-vent System and Control Device Requirements
Effective between the dates of 06/20/2001 and 06/19/2006



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Applicable Federal Requirement: 40CFR 63.445(b), Subpart S

Item 44.1:

This Condition applies to Emission Unit: B-PLANT

Item 44.2:

The equipment at each bleaching stage where chlorinated compounds are introduced shall be enclosed and vented into a closed vent system and routed to a control device that meets one or more of the requirements in conditions under §63.445(c). The enclosures and closed vent system shall meet the requirements specified in conditions under §63.450.

Condition 45: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.445(c)(2), Subpart S

Item 45.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 45.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The control device used to reduce chlorinated HAP emissions shall achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP. Emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority. The test shall measure the treatment outlet device concentration of either:

1) chlorine using EPA Method 26A as modified by 40CFR63.457(b)(5)(ii) or

2) the sum of all individual chlorinated HAPs using a method that has been demonstrated to the USEPA administrator's satisfaction.

Parameter Monitored: CHLORINE

Upper Permit Limit: 10 parts per million (by volume)

Reference Test Method: 40CFR60 Method 26A



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Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-1: Compliance Certification

Effective between the dates of 12/31/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.450(d), Subpart S

Item 4-1.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 4-1.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443, 63.444, or 63.445 shall comply with either of the following requirements:

- 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. This will consist of a pressure indicator with a maximum pressure of 2 inches of water; or
- 2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. The valve or closure mechanism shall be inspected at least monthly to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.



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Parameter Monitored: PRESSURE
Upper Permit Limit: 2 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 2-6: Compliance Certification
Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Item 2-6.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT Emission Point: 00004
Process: 116

Regulated Contaminant(s):
CAS No: 007782-50-5 CHLORINE

Item 2-6.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A minimum scrubber filtrate recirculation flow rate of 550 gallons per minute must be maintained at all times the process is operating. Compliance with this requirement will be based on a 3-hour rolling average. The permittee shall install, calibrate, operate and maintain a continuous monitor and data recorder for the recirculation flow rate.

Parameter Monitored: VOLUMETRIC FLOW RATE
Lower Permit Limit: 550 gallons per minute
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 2-7: Compliance Certification



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Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Item 2-7.1:

The Compliance Certification activity will be performed for:

Emission Unit: B-PLANT Emission Point: 00004
Process: 116

Regulated Contaminant(s):
CAS No: 007782-50-5 CHLORINE

Item 2-7.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

A minimum scrubber pH of 9.2 must be maintained at all times the process is in operation. Compliance with this requirement shall be based on a 3-hour rolling average. The permittee shall install, calibrate, operate and maintain a continuous monitor and data recorder for scrubber pH.

Parameter Monitored: ACIDITY/ALKALINITY
Lower Permit Limit: 9.2 pH (STANDARD) units
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2003.
Subsequent reports are due every 6 calendar month(s).

Condition 2-8: Submissions to the Department.

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-2.1

Item 2-8.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-8.2: Each submission under the NO_x Budget Trading Program shall be submitted, signed and certified by the NO_x authorized account representative for each NO_x Budget source on behalf of which the submission is made. Each submission shall include a certification statement (as stated in paragraph 204-2.1(e)(1)) by the NO_x authorized account representative.

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Condition 2-9: Content of reports and compliance certifications.
Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-4.1

Item 2-9.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-9.2: The NOx authorized account representative shall include in the compliance certification report the following elements, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx Budget emissions limitation for the control period covered by the report:

- (1) Identification of each NOx Budget unit; and
- (2) In the compliance certification report the NOx authorized account representative shall certify, based on reasonable inquiry of those persons with primary responsibility for operating the source and the NOx Budget units at the source in compliance with the NOx Budget Trading Program, whether each NOx Budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx Budget Trading Program applicable to the unit, including:
 - (i) Whether the unit was operated in compliance with the NOx Budget emissions limitation;
 - (ii) Whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with Subpart 204-8;
 - (iii) Whether all the NOx emissions from the unit, or a group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with Subpart 204-8. If conditional data were reported, the owner or operator shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report resubmissions has been made;
 - (iv) Whether the facts that form the basis for certification under Subpart 204-8 of each monitor at the unit or a group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under Subpart 204-8, if any, has changed; and
 - (v) If a change is required to be reported under item (iv) above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor recertification.

Condition 2-10: Submission of NOx allowance transfers.
Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-7.1



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Item 2-10.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-10.2: The NOx authorized account representatives seeking recordation of a NOx allowance transfer shall submit the transfer to the Administrator. To be considered correctly submitted, the NOx allowance transfer shall include the following elements in a format specified by the Administrator:

- (a) The numbers identifying both the transferor and transferee accounts;
- (b) A specification by serial number of each NOx allowance to be transferred; and
- (c) The printed name and signature of the NOx authorized account representative of the transferor account and the date signed.

Condition 2-11: General provisions.

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 2-11.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-11.2: The owners and operators, and to the extent applicable, the NOx authorized account representative of a NOx Budget unit, shall comply with the monitoring and reporting requirements as provided in this Subpart and in Subpart H of 40 CFR Part 75. For purposes of complying with such requirements, the definitions in Section 204-1.2 and in 40 CFR 72.2 shall apply, and the terms "affected unit," "designated representative," and "continuous emission monitoring system" (or "CEMS") in 40 CFR Part 75 shall be replaced by the terms "NOx Budget unit," "NOx authorized account representative," and "continuous emission monitoring system" (or "CEMS"), respectively, as defined in Section 204-1.2.

Condition 2-12: Prohibitions.

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 2-12.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-12.2: No owner or operator of a NOx Budget unit or a non-NOx Budget unit monitored under 40 CFR 75.72(b)(2)(ii) shall:

- (1) use any alternative monitoring system, alternative reference method, or any other alternative for the required continuous emission monitoring system without having obtained prior written approval in accordance with Section 204-8.6;
- (2) operate the unit so as to discharge, or allow to be discharged, NOx emissions to the atmosphere without accounting for all such emissions in accordance with the applicable provisions of this Subpart and 40 CFR Part 75 except as provided for in 40 CFR 75.74;



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(3) disrupt the continuous emission monitoring system, any portion thereof, or any other approved emission monitoring method, and thereby avoid monitoring and recording NO_x mass emissions discharged into the atmosphere, except for periods of recertification or periods when calibration, quality assurance testing, or maintenance is performed in accordance with the applicable provisions of this Subpart and 40 CFR Part 75 except as provided for in 40 CFR 75.74; and

(4) permanently discontinue use of the continuous emission monitoring system, any component thereof, or any other approved emission monitoring system under this Subpart, except under any one of the following circumstances:

(i) The owner or operator is monitoring emissions from the unit with another certified monitoring system approved, in accordance with the applicable provisions of this Subpart and 40 CFR Part 75, by the Department for use at that unit that provides emission data for the same pollutant or parameter as the discontinued monitoring system; or

(ii) The NO_x authorized account representative submits notification of the date of certification testing of a replacement monitoring system in accordance with Paragraph 204-8.2(b)(2).

**Condition 2-13: Requirements for installation, certification, and data accounting.
Effective between the dates of 01/27/2003 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 204-8.1

Item 2-13.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-13.2: The owner or operator of each NO_x Budget unit must meet the following requirements. These provisions also apply to a unit for which an application for a NO_x Budget opt-in permit is submitted and not denied or withdrawn, as provided in Subpart 204-9:

(1) Install all monitoring systems required under this Subpart for monitoring NO_x mass. This includes all systems required to monitor NO_x emission rate, NO_x concentration, heat input, and air or fuel flow, in accordance with 40 CFR 75.71 and 75.72.

(2) Install all monitoring systems for monitoring heat input, if required under Section 204-8.7 for developing NO_x allowance allocations.

(3) Successfully complete all certification tests required under Section 204-8.2 and meet all other provisions of this Subpart and 40 CFR Part 75 applicable to the monitoring systems under paragraphs (a)(1) and (2) of this section.

(4) Record and report data from the monitoring systems under paragraphs (a)(1) and (2) of this section.

**Condition 2-14: Requirements for recertification of monitoring systems.
Effective between the dates of 01/27/2003 and 06/19/2006**

Applicable Federal Requirement: 6NYCRR 204-8.2

Item 2-14.1:

This Condition applies to Emission Unit: P-OWERH



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Item 2-14.2: Whenever the owner or operator makes a replacement, modification, or change in a certified monitoring system that the Administrator or the Department determines significantly affects the ability of the system to accurately measure or record NO_x mass emissions or heat input or to meet the requirements of 40 CFR 75.21 or Appendix B to 40 CFR Part 75, the owner or operator shall recertify the monitoring system according to 40 CFR 75.20(b). Furthermore, whenever the owner or operator makes a replacement, modification, or change to the flue gas handling system or the unit's operation that the Administrator or the Department determines to significantly change the flow or concentration profile, the owner or operator shall recertify the continuous emissions monitoring system according to 40 CFR 75.20(b). Examples of changes which require recertification include: replacement of the analyzer, change in location or orientation of the sampling probe or site, or changing of flow rate monitor polynomial coefficients.

Condition 2-15: Out of control periods.

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-8.3

Item 2-15.1:

This Condition applies to Emission Unit: P-OWERH

Item 2-15.2: Whenever any monitoring system fails to meet the quality assurance requirements of Appendix B of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

Condition 2-16: Compliance Certification

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-8.4

Item 2-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 2-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The Authorized Account Representative for a NO_x Budget unit shall submit written notice to the Department and the USEPA Administrator in accordance with the requirements of this subpart as follows:

All monitoring plans or monitoring plan modifications; compliance certifications, recertifications and quarterly QA/QC reports; and, petitions for alternative monitoring, shall be submitted to the USEPA



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Administrator (or his/her representatives) as well as two copies to the Department (one copy to the Regional Air Pollution Control Engineer (RAPCES) in the regional office and one one copy to the Bureau of Compliance Monitoring and Enforcement (BCME) in the DEC central office. All Authorized Account Representative changes shall be sent to the NYSDEC central office.

All quarterly emission data shall be electronically filed with the USEPA Clean Air Markets Division with a copy (disc or hard copy) to the NYSDEC offices.

The address for the USEPA Administrator is as follows:

USEPA Clean Air Markets Division
401 M Street SW (6204J)
Washington D.C. 20460

CEM Coordinator
USEPA-Region 2
2890 Woodbridge Avenue
Edison, N.J. 08837

The address for the BCME is as follows:

NYSDEC
Bureau of Compliance Monitoring and Enforcement
625 Broadway, 2nd Floor
Albany N.Y. 12233-3258

ACR changes should be sent to the attention of:

NYSDEC
Stationary Source Planning Section
Bureau of Air Quality Planning
625 Broadway, 2nd Floor
Albany NY 12233-3251

The address for the RAPCE is as follows:

Region 5 Suboffice
Hudson Street Extension
P.O. Box 220
Warrensburg, NY 12885

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION



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Condition 2-17: Compliance Certification

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 204-8.7

Item 2-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 2-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operator of a unit that elects to monitor and report NO_x Mass emissions using a NO_x concentration system and a flow system shall also monitor and report heat input at the unit level using the procedures set forth in 40 CFR Part 75.

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 49: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 225-1.7(c)

Item 49.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 49.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

Measurements must be made daily of the rate of each fuel burned. The gross heat content and ash content of each fuel burned must be determined at least once each week.

Monitoring Frequency: DAILY

Reporting Requirements: UPON REQUEST BY REGULATORY AGENCY

Condition 50: Compliance Certification



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Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 225-1.7(e)

Item 50.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Item 50.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The facility shall submit a written report to the Department quarterly. These quarterly reports shall include:

- a. a summary of all emission limit violations;
- b. a summary of CEM operations, including downtime and out-of-control periods;
- c. a summary of quarterly audit results;
- d. descriptions of any significant changes in the process, control equipment or CEM system; and
- e. information required by Schedule A of Order on Consent #R5-2265-98-07.

For the purposes of this permit, excess emissions indicated by the CEM system of SO₂ or NO_x other than startups, shutdowns and malfunctions (as defined in 40CFR60, Subpart A) are considered violations of the applicable emission limits. The quarterly report shall be in the format given in Section 10 of NYSDEC's Air Guide 34. Equivalent formats may be accepted, subject to the review and approval of the Department.

The facility shall maintain a file of all measurements, daily zero and span checks, CEM system performance evaluations and repairs and maintenance to the system for a period of five years from the date of occurrence. These records must be available for inspection by Department personnel during normal business hours.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 7/30/2001.

Subsequent reports are due every 3 calendar month(s).



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Condition 3-12: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 225-2.3(b)(1)

Item 3-12.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 3-12.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the power boiler as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification to the permit.

Waste oil generated on site (lubricating, hydraulic and parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not contaminated with chemical waste,

Combustion efficiency testing is performed within 60 days of first use of waste oil,

the quantity does not exceed 10,000 gallons per year and,
the waste oil is blended with #6 oil at a ratio of not more than 1 gallon waste oil to 100 gallons #6 oil.

Quantities of waste oil used must be recorded on each date it is blended with the #6 oil and the records maintained at the facility.



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Facility DEC ID: 5154800008

Parameter Monitored: COMBUSTION EFFICIENCY

Lower Permit Limit: 99 percent

Reference Test Method: method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-13: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 227-1.2

Item 3-13.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3-13.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The firing rate of bark and wood shall not exceed 547 wet tons per day. Dewatered secondary biosolids, rejected wood knots or primary clarifier fiber may be substituted for wood or bark at the ratio of 1 part alternative fuel to 10 parts wood or bark - not to exceed the daily maximum of 40 cubic yards for any one alternative fuel. A log shall be maintained on-site which indicates the date and volume of each delivery of alternative fuel to the woodyard.

Parameter Monitored: WOOD

Upper Permit Limit: 547 tons per day

Monitoring Frequency: DAILY

Averaging Method: 24-HOUR MAXIMUM - NOT TO BE EXCEEDED MORE THAN
ONCE PER CALENDAR YEAR

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-14: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 227-1.2(a)(3)

Item 3-14.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3-14.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of particulates shall not exceed a rate of 0.10 pounds per million Btus. Stack testing to demonstrate compliance with this limit will be performed once during the permit term unless additional testing is required by the permitting authority.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-2: Compliance Certification

Effective between the dates of 12/31/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(a)

Item 4-2.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Regulated Contaminant(s):

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



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 4-2.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. During startup, NOx emissions shall not exceed 122 pounds per hour averaged over the first 24 hours of operation. This equates to 80% of allowable emissions during normal operating conditions and applies only during ozone season.

The NOx CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Manufacturer Name/Model Number: Thermo Environmental Model 42C

Upper Permit Limit: 122 pounds per hour

Reference Test Method: Appx PS-2

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 24-HOUR AVERAGE

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 3 calendar month(s).

Condition 1-4: Compliance Certification

Effective between the dates of 11/21/2001 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.443(d), Subpart S

Item 1-4.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: 111

Emission Source: 10044

Item 1-4.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Continuously monitor oil flow to the boiler to ensure boiler is in operation to confirm adequate treatment of non-condensable gases.



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Facility DEC ID: 5154800008

Boiler startup / shutdown to be reported in semi-annual NESHAP report.

Parameter Monitored: NUMBER 6 OIL

Lower Permit Limit: 2 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE
MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2002.

Subsequent reports are due every 6 calendar month(s).

Condition 5-16: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Regulated Contaminant(s):

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

Item 5-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Whenever tire-derived fuel (TDF) is being burned in the power boiler, the NOX emission rate must not exceed 0.25 pounds per MMBtu. This indicates that the power boiler is operating properly. If the NOX emission rate exceeds 0.25 pounds per MMBtu, the facility must stop adding TDF until NOX emissions stabilize and are in compliance.

Manufacturer Name/Model Number: Thermo Environmental Model 42C

Parameter Monitored: OXIDES OF NITROGEN

Upper Permit Limit: 0.25 pounds per million Btus

Reference Test Method: PS-2

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Condition 5-17: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Item 5-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Tire-derived fuel (TDF) may be burned in the power boiler for a trial period of up to 14 days over a period not to exceed 21 consecutive days. The TDF fuel rate shall not exceed 3 tons per hour and the total heat input to the boiler shall not exceed 748 MMBtu per hour. In addition, the only other fuels that may be burned while TDF is being burned are oil, wood and non-condensable gases.

Work Practice Type: PROCESS MATERIAL THRUPTUT

Process Material: MATERIAL

Upper Permit Limit: 3 tons per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 5-18: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-18.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Item 5-18.2:

Compliance Certification shall include the following monitoring:



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Facility DEC ID: 5154800008

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

Monitoring Description:

Whenever tire-derived fuel (TDF) is being burned in the power boiler, the opacity must not exceed 20%. The facility shall have a certified method 9 opacity observer available during daylight hours to make hourly readings and additional readings as directed by the permitting authority. If the opacity exceeds 20%, the facility must stop adding TDF until emissions stabilize and are in compliance.

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: 6-MINUTE AVERAGE (METHOD 9)

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 5-19: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-19.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 5-19.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Whenever tire-derived fuel (TDF) is being burned in the power boiler, the SO₂ emission rate must not exceed 309 pounds per hour. This indicates that the power boiler scrubber is operating properly. If the SO₂ emission rate exceeds 309 pounds per hour, the facility must stop adding TDF until SO₂ emissions stabilize and are in compliance.

Manufacturer Name/Model Number: Thermo Environmental 43 CHL

Parameter Monitored: SULFUR DIOXIDE

Upper Permit Limit: 309 pounds per hour

Reference Test Method: PS-2



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 5-20: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-20.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Item 5-20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

For a trial period, tire-derived fuel (TDF) may be combusted in the power boiler along with number 6 fuel oil and wood. During the trial, extensive stack testing will be performed under an approved stack test protocol. Testing will measure emissions of the following:

Filterable and condensable particulate matter

Dioxins and Furans

Polycyclic Aromatic Hydrocarbons (PAHs)

Polychlorinated Biphenyls (PCBs)

Hydrogen Chloride

Heavy metals including Zinc, Lead, Mercury and others

Hexavalent Chrome

Carbon Monoxide

Total Hydrocarbons

At the conclusion of the trial period, the same contaminants will be measured while operating the boiler at comparable heat input, but without TDF, for comparison of emissions.

A stack test report will be submitted to the permitting authority within 60 days of the completion of testing.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 5-21: Compliance Certification



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 200.6

Item 5-21.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Item 5-21.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Tire-derived fuel (TDF) may be burned in the power boiler for a trial period of up to 14 days over a period not to exceed 21 consecutive days. The TDF fuel rate shall not exceed 3 tons per hour and the total heat input to the boiler shall not exceed 748 MMBtu per hour. In addition, the only other fuels that may be burned while TDF is being burned are oil, wood and non-condensable gases.

Work Practice Type: PARAMETER OF PROCESS MATERIAL

Process Material: FUEL

Parameter Monitored: HEAT INPUT

Upper Permit Limit: 748 million Btu per hour

Monitoring Frequency: CONTINUOUS

Averaging Method: 1 HOUR MAXIMUM - NOT TO BE EXCEEDED AT ANY TIME

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2006.

Subsequent reports are due every 6 calendar month(s).

Condition 5-22: Compliance Certification

Effective between the dates of 09/20/2006 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 227-1.2(a)(3)

Item 5-22.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH

Process: TDF

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 5-22.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

During the trial period before the formal stack testing, the facility will perform method 5 stack testing at baseline; when the TDF feed rate stabilizes at 1 ton per hour; again at 2 tons per hour and again at 3 tons per hour. Test results shall be reported to NYSDEC within 24 hours of each set of testing. If the particulate emission rate exceeds 0.10 pound per MMBtu, the TDF fuel rate will be immediately reduced to a level at which compliance with the limit has been demonstrated.

Additional testing may be required at the discretion of the permit administrator.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.10 pounds per million Btus

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 3-16: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 227-2.4(a)(2)

Item 3-16.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

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

Item 3-16.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record NOx emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. NOx emissions shall not exceed



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0.25 lbs/mmBtu. This limit applies for all periods except during the first 24 hours of startup. Compliance with this emission limit shall be determined on a 24-hour average in accordance with the provisions of 6NYCRR Paragraph 227-2.6(a)(1). From October 1 to April 30, the non-ozone season, a 30 day rolling average may be used to demonstrate compliance.

The NO_x CEM system shall be installed, calibrated, operated and maintained in accordance with 6NYCRR Subdivision 227-2.6(b).

Manufacturer Name/Model Number: Thermo Environmental model 42C
Upper Permit Limit: 0.25 pounds per million Btus
Reference Test Method: Appx PS-2
Monitoring Frequency: CONTINUOUS
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 3 calendar month(s).

Condition 3-17: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 3-17.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 3-17.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record SO₂ emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. SO₂ emissions shall not exceed 435 lb/hr (rolling 3 hour average).

The SO₂ CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. A certified flow monitor shall be used to measure stack



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Facility DEC ID: 5154800008

flowrate unless the most restrictive F-factor for the multiple fuel mix is used.

Manufacturer Name/Model Number: Thermo Environmental 43 CHL
Upper Permit Limit: 435 pounds per hour
Reference Test Method: 40CFR60 Appx B PS2
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR ROLLING AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 3-18: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 3-18.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 007446-09-5 SULFUR DIOXIDE

Item 3-18.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The facility must continuously calculate and record SO₂ emissions during all periods of boiler operation, except during CEM quality control checks or routine maintenance. SO₂ emissions shall not exceed 309 lb/hr (rolling 24 hour average).

The SO₂ CEM system shall be installed, calibrated, operated and maintained in accordance with 40CFR75 and/or 40CFR60, Appendix B and Appendix F. A certified flow monitor shall be used to measure stack flowrate unless the most restrictive F-factor for the multiple fuel mix is used.

Manufacturer Name/Model Number: Thermo Environmental 43 CHL
Upper Permit Limit: 309 pounds per hour
Reference Test Method: 40CFR60 Appx B PS2
Monitoring Frequency: CONTINUOUS



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Permit ID: 5-1548-00008/00081

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Averaging Method: 24-HR ROLLING AVG., CALCULATED EA. HR AS THE AVG
OF THE PAST 24 OPERATING HRS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 58: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 40CFR 52.21(k), Subpart A

Item 58.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-OWERH Emission Point: 00044

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 58.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

A sixty-eight (68) percent control efficiency or an emission rate of 0.11 lbs/mmBtu, whichever is more stringent, must be achieved for total particulates at the power boiler. Particulate emission testing shall be conducted once per permit term unless additional testing is required by the permitting authority. Emission testing must include measurement of stack emission rate and demonstration of control efficiency. Emission testing shall be conducted in accordance with 6NYCRR Subpart 202-1.

The sulfur dioxide stack emission rate, as measured by the CEMs, shall be used as a surrogate parameter for scrubber operation and particulate removal. This association shall be verified during the periodic emission testing.

In addition, the following operating parameters shall be continuously monitored and recorded: stack carbon monoxide, scrubber filtrate recirculation, scrubber filtrate pH, boiler steaming rate, stack gas temperature, oil and solid fuel feed rates.

Lower Permit Limit: 68 percent reduction by weight

Reference Test Method: EPA Method 5



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Frequency: ONCE DURING THE TERM OF THE PERMIT

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 62: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.443(d), Subpart S

Item 62.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 62.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

HAP emissions from each LVHC system, knotter or screen system, pulp washing system, decker system and weak liquor storage tank shall be vented to a closed vent system and routed to the power boiler for thermal destruction. Emissions may be vented to the atmosphere only in accordance with the Ticonderoga Mill's Startup, Shutdown and Malfunction Plan and per 40CFR 63.443(e).

When the power boiler is not in operation, these HAP emissions must be diverted to an alternate control device which achieves at least 80% control or the pulping process must be stopped so that no HAP emissions are created. Diversion to the alternate control device will not exceed 1% of the time that the pulping process is in operation.

This constitutes a system with greater than 99% overall control efficiency. 99% control efficiency is required under consent order #1743 executed on September 23, 1974.

Control efficiency of the control device shall be demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1.

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Subsequent reports are due every 6 calendar month(s).

Condition 2-18: Compliance Certification

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.446(c)(3), Subpart S

Item 2-18.1:

The Compliance Certification activity will be performed for:

Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 2-18.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Treat pulping process condensates containing a total of at least 11.1 pounds methanol per ton of oven dried pulp (ODP) by recycling the condensate; using it as shower water in No. 2 brown stock washer. The quantity of shower water and the methanol concentration of the condensate will be calculated daily to determine the pounds per ton treated over the previous 15 days.

Parameter Monitored: METHYL ALCOHOL

Lower Permit Limit: 11.1 pounds per ton

Monitoring Frequency: DAILY

Averaging Method: MINIMUM - NOT TO FALL BELOW STATED VALUE - SEE
MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2003.

Subsequent reports are due every 6 calendar month(s).

Condition 3-19: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.450(d), Subpart S

Item 3-19.1:

The Compliance Certification activity will be performed for:



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Emission Unit: P-ULPIN

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 3-19.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Each bypass line in the closed vent-systems that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443, 63.444, or 63.445 shall comply with either of the following requirements:

- 1) On each bypass line, the owner or operator shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in such a way as to indicate flow in the bypass line. This will consist of a pressure indicator with a maximum pressure of 2 inches of water except for the following: chip bin - 8 inches; evaporator seal tank and brown stock washer seal tanks - 6 inches; or
- 2) For bypass lines that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. The valve or closure mechanism shall be inspected at least monthly to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Parameter Monitored: PRESSURE

Upper Permit Limit: 2 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 66: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Applicable Federal Requirement: 40CFR 60.116b, NSPS Subpart Kb

Item 66.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Item 66.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This applies to storage vessels containing volatile organic liquids, with a capacity of greater than 10,565 gallons and which have been constructed, reconstructed or modified after July 23, 1984. The owner or operator of each such storage vessel shall keep readily accessible records showing the dimensions of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage vessel.

Each storage vessel with a design capacity less than 75 cubic meters is subject to no other provision of 40CFR60 Subpart Kb other than those required by the above paragraph.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: AS REQUIRED - SEE MONITORING DESCRIPTION

Condition 3-20: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3

Item 3-20.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 3-20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Emissions of Total Reduced Sulfur (TRS) from the lime kiln shall not exceed 10 ppm or 0.7 pounds per hour (whichever is more restrictive) for more than 60 cumulative minutes per month. At maximum production rate, 0.7 pounds per hour is more restrictive and equates to 7 ppm corrected to 10% oxygen concentration. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system (CEMS) for lime kiln TRS emissions. This standard of performance shall not be applicable during a period of 24 hours immediately following commencement of start-up operations of the lime kiln. This is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Graseby STI
Parameter Monitored: TOTAL REDUCED SULFUR
Upper Permit Limit: 0.7 pounds per hour
Reference Test Method: 40CFR60.284 modified
Monitoring Frequency: CONTINUOUS
Averaging Method: CALENDAR MONTH TOTAL
Reporting Requirements: QUARTERLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 1/30/2005.
Subsequent reports are due every 3 calendar month(s).

Condition 68: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3

Item 68.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST
Process: 115

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

Item 68.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING
Monitoring Description:

Particulate emissions shall not exceed 0.15 grains per dry standard cubic foot of exhaust gas. Emission testing to verify compliance with this standard shall be conducted once per permit term unless additional testing is required by the permitting authority. Testing



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

must be conducted in accordance with 6NYCRR Subpart 202-1.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 2-20: Compliance Certification

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.10

Item 2-20.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Regulated Contaminant(s):

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

Item 2-20.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in October 1994 determined that the lime kiln as it was designed and operated met NO_x RACT. A limit of 0.21 pounds per million Btu's is established and emission testing to verify compliance with this limit will be performed once during the permit term; unless additional testing is required by the permitting authority.

Upper Permit Limit: 0.21 pounds per million Btus

Reference Test Method: Method 7E

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 3-21: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 225-2.3(b)(1)



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 3-21.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10005

Regulated Contaminant(s):

CAS No: 0NY100-00-0 HAP

Item 3-21.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

Waste fuel Type A (used oil) may be burned in the lime kiln as a substitute for number 6 fuel oil. Type A waste fuel meets the limitations of Table 2-1 of section 225-2.4. Combustion efficiency when burning waste fuel must be at least 99% as demonstrated by emission testing conducted in accordance with 6NYCRR Subpart 202-1. Testing will also be required for metals, dioxins/furans and PCBs and results must be reviewed and approved prior to permanent use of the waste fuel. If testing results demonstrate a need to impose limits on waste fuel use, the Department will establish the limits with a modification to the permit.

Waste oil generated on site (lubricating, hydraulic and parts cleaning oils) may be burned without performing the testing for metals, dioxins/furans and PCBs described above; under the following conditions:

Procedures are in place to ensure the oils are not contaminated with chemical waste,

Combustion efficiency testing is performed within 60 days of first use of waste oil,

the quantity does not exceed 10,000 gallons per year and,
the waste oil is blended with #6 oil at a ratio of not more than 1 gallon waste oil to 100 gallons #6 oil.

Quantities of waste oil used must be recorded on each date it is blended with the #6 oil and the records maintained at the facility.

Parameter Monitored: COMBUSTION EFFICIENCY

Lower Permit Limit: 99 percent

Reference Test Method: method 10

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD
INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 1-7: Compliance Certification

Effective between the dates of 11/21/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.11(b)(5)

Replaces Condition(s) 70

Item 1-7.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Regulated Contaminant(s):

CAS No: 0NY500-00-0

TOTAL REDUCED SULFUR

Item 1-7.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

When lime kiln emissions exceed 4 ppm TRS (adjusted to 10% O₂),

supply 0.25 gallons per minute of caustic to the lime kiln scrubber.

The permittee shall install, calibrate, operate and maintain a

continuous monitor and data recorder for caustic flow rate. This is a

requirement of consent order #1743 executed on September 23, 1974.

Parameter Monitored: VOLUMETRIC FLOW RATE

Lower Permit Limit: 0.25 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2002.

Subsequent reports are due every 6 calendar month(s).

Condition 3-22: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 3-22.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Item 3-22.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The owner or operators of an existing kraft lime kiln equipped with a wet scrubber are in violation of the standards of 63.862 when 6 or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established. For this scrubber, the minimum pressure drop is 19.5 inches of water. This does not apply during the first 6 hours of a start-up of the kiln.

Parameter Monitored: PRESSURE CHANGE

Lower Permit Limit: 19.5 inches of water

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-23: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 3-23.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST

Process: 115

Emission Source: 10077

Item 3-23.2:

Compliance Certification shall include the following monitoring:

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



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Description:

The owner or operators of an existing kraft lime kiln equipped with a wet scrubber are in violation of the standards of 63.862 when 6 or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established. For this scrubber, the minimum scrubber flow rate is 145 gallons per minute.

Parameter Monitored: FLOW RATE

Lower Permit Limit: 145 gallons per minute

Monitoring Frequency: CONTINUOUS

Averaging Method: 3-HOUR BLOCK AVERAGE

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-24: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

Item 3-24.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-CAUST Emission Point: 00005

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3-24.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of the kraft lime kiln must ensure that the concentration of particulate matter in the exhaust gases discharged to the atmosphere is less than or equal to 0.15 grains per dry standard cubic foot corrected to 10 percent oxygen. This is part of an overall chemical recovery system particulate emission limit calculated using equation 1 of section 63.865. If all three components (recovery boiler, lime kiln and smelt dissolving tank) of the system are tested together, the combined limit applies and the individual limit for this source does not apply for this regulation.

Testing will be performed once during each permit term unless additional testing is required by the permitting authority.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Parameter Monitored: PARTICULATES
Upper Permit Limit: 0.15 grains per dscf
Reference Test Method: method 5
Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION
Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED
Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-3: Compliance Certification
Effective between the dates of 12/31/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3

Item 4-3.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):
CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 4-3.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of total reduced sulfur from the recovery boiler shall not exceed 8 ppm (dry - corrected to 8% oxygen) for more than 60 cumulative minutes per day. This corresponds to 10 ppm before adjustment. The permittee shall install, calibrate, operate and maintain a continuous emission monitoring system for the recovery boiler emissions. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations. A limit of 10 ppm is a requirement of consent order #1743 executed on September 23, 1974.

Manufacturer Name/Model Number: Graseby STI
Parameter Monitored: TOTAL REDUCED SULFUR
Upper Permit Limit: 8 parts per million (by volume)
Reference Test Method: 40CFR60.284 Modified
Monitoring Frequency: CONTINUOUS
Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2005.



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Subsequent reports are due every 6 calendar month(s).

Condition 3-26: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3

Item 3-26.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Regulated Contaminant(s):

CAS No: 0NY500-00-0 TOTAL REDUCED SULFUR

Item 3-26.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

Emissions of total reduced sulfur from the recovery boiler shall not exceed 4 ppm (dry - corrected to 8% oxygen) for a daily average. This corresponds to 5 ppm before adjustment. This standard of performance shall not be applicable during a period of 24 hours immediately before actual shutdown or during a period of 24 hours immediately following commencement of start-up operations of the recovery boiler. A limit of 5 ppm is a requirement of consent order #1743 executed September 23, 1974.

Manufacturer Name/Model Number: Graseby STI

Parameter Monitored: TOTAL REDUCED SULFUR

Upper Permit Limit: 4 parts per million (by volume)

Reference Test Method: 40CFR60.284 modified

Monitoring Frequency: CONTINUOUS

Averaging Method: 24 HOUR DAILY AVERAGE (ARITHMETIC MEAN - APP. A, METHOD 19)

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

Subsequent reports are due every 3 calendar month(s).

Condition 3-27: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Item 3-27.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 3-27.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of the recovery boiler must ensure that the concentration of particulate matter in the exhaust gases discharged to the atmosphere is less than or equal to 0.03 grains per dry standard cubic foot corrected to 8 percent oxygen. This is part of an overall chemical recovery system particulate emission limit determined by equation 1 of 63.865 (1.28 lb per ton of black liquor solids fired based on last stack test). If all three components (recovery boiler, lime kiln and smelt dissolving tank) of the system are tested together, the combined limit applies and the individual limit for this source does not apply for this regulation.

Testing will be performed once during each permit term unless additional testing is required by the permitting authority.

Upper Permit Limit: 0.03 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 3-28: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(d), Subpart MM

Item 3-28.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 3-28.2:

Compliance Certification shall include the following monitoring:



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Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

The owner or operators of kraft recovery furnace equipped with an ESP must install, calibrate, maintain and operate a COMS according to the provisions in paragraphs (d)(1) through (d)(4) of this section.

Monitoring Frequency: CONTINUOUS

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).

Condition 3-29: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 3-29.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 3-29.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The owner or operator must implement corrective action, as specified in the start-up, shutdown and malfunction plan, if the combined opacity of the two stacks exceeds 20% for 10 consecutive six minute periods. Combined opacity exceeds 20% when the average opacity of the two stacks exceeds 11%.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk

Parameter Monitored: OPACITY

Upper Permit Limit: 11 percent

Reference Test Method: PS1

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

Condition 3-30: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 3-30.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 103

Emission Source: 10001

Item 3-30.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: CONTINUOUS EMISSION MONITORING (CEM)

Monitoring Description:

The owner or operators of an existing kraft recovery boiler equipped with an ESP are in violation of the standards of 63.862 when the combined opacity of the two stacks is greater than 35% for 6 percent or more of the operating time within any quarterly period. Combined opacity exceeds 35% when the average of the two stacks is equal to or greater than 20%.

Manufacturer Name/Model Number: Monitor Labs 560 Lighthawk

Parameter Monitored: OPACITY

Upper Permit Limit: 20 percent

Reference Test Method: PS1

Monitoring Frequency: CONTINUOUS

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: QUARTERLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 1/30/2005.

Subsequent reports are due every 3 calendar month(s).

Condition 3-31: Compliance Certification

Effective between the dates of 12/15/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.862(a)(ii), Subpart MM

Item 3-31.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10003

Regulated Contaminant(s):



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

CAS No: 0NY075-00-0 PARTICULATES

Item 3-31.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The owner or operator of the smelt dissolving tank must ensure that the concentration of particulate matter in the exhaust gases discharged to the atmosphere is less than or equal to 0.15 grains per dry standard cubic foot. This is part of an overall chemical recovery system particulate emission limit calculated using equation 1 of section 63.865. If all three components (recovery boiler, lime kiln and smelt dissolving tank) of the system are tested together, the combined limit applies and the individual limit for this source does not apply for this regulation.

Testing will be performed once during each permit term unless additional testing is required by the permitting authority.

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 4-4: Compliance Certification

Effective between the dates of 12/31/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 4-4.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B

Process: 105

Emission Source: 10102

Item 4-4.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The owner or operators of an existing kraft smelt dissolving tank equipped with a wet scrubber are in violation of the standards of 63.862 when 6 or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established.



New York State Department of Environmental Conservation

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Facility DEC ID: 5154800008

For this scrubber, the minimum scrubber flow rate is 11.8 gallons per minute.

Parameter Monitored: FLOW RATE
Lower Permit Limit: 11.8 gallons per minute
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 4-5: Compliance Certification
Effective between the dates of 12/31/2004 and 06/19/2006

Applicable Federal Requirement: 40CFR 63.864(k), Subpart MM

Item 4-5.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B
Process: 105 Emission Source: 10102

Item 4-5.2:

Compliance Certification shall include the following monitoring:

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

Monitoring Description:

The owner or operators of an existing kraft smelt dissolving tank equipped with a wet scrubber are in violation of the standards of 63.862 when 6 or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established. For this scrubber, the minimum pressure drop is 5.5 inches of water.

Parameter Monitored: PRESSURE CHANGE
Lower Permit Limit: 5.5 inches of water
Monitoring Frequency: CONTINUOUS
Averaging Method: 3-HOUR BLOCK AVERAGE
Reporting Requirements: SEMI-ANNUALLY (CALENDAR)
Reports due 30 days after the reporting period.
The initial report is due 4/30/2005.
Subsequent reports are due every 6 calendar month(s).

Condition 75: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Applicable Federal Requirement: 6NYCRR 212.4

Item 75.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001
Process: 103 Emission Source: 10001

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

Item 75.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Particulate emissions shall not exceed 0.05 grains per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Testing frequency shall be once during the term of the permit unless additional testing is required by the permitting authority.

Upper Permit Limit: 0.05 grains per dscf

Reference Test Method: EPA METHOD 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 76: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.4

Item 76.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001
Process: 103 Emission Source: 10001

Item 76.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Normal operation while firing black liquor is with both electrostatic



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

precipitators on line. If the older precipitator (source #10101) is off line for maintenance, the boiler may continue to operate at full capacity. However, when the new precipitator (source #10104) is off line, the firing rate is limited to no more than 1100 lbs per minute of black liquor solids.

Work Practice Type: PROCESS MATERIAL THRUPUT

Process Material: OTHER SOLID FUELS

Upper Permit Limit: 1100 pounds per minute

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD - SEE MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.

Subsequent reports are due every 6 calendar month(s).

Condition 77: Compliance Certification

Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.10

Item 77.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001

Process: 103 Emission Source: 10001

Regulated Contaminant(s):

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

Item 77.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

The RACT analysis completed in October 1994 concluded that the recovery boiler as it was designed and operated met NO_x RACT. A standard of 100 ppmdv corrected to 8% O₂ is established and emission testing to verify compliance with this standard will be performed once during the permit term unless additional testing is required by the permitting authority.

Upper Permit Limit: 100 parts per million (by volume)

Reference Test Method: USEPA Method 7

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD



New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008

INDICATED

Reporting Requirements: ONCE / BATCH OR MONITORING OCCURRENCE

Condition 78: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.4

Item 78.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00001
Process: 104 Emission Source: 10001

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

Item 78.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: WORK PRACTICE INVOLVING SPECIFIC OPERATIONS

Monitoring Description:

Limit oil use to less than 10% of the total fuel burned in the recovery boiler based on heat input. 10% of heat input is 371,000 MMBTU/yr which equates to 2,470,000 gallons of oil (#6 oil and type A waste fuel combined).

Work Practice Type: PROCESS MATERIAL THRUPT

Process Material: OIL (NOT ELSEWHERE CLASSIFIED)

Upper Permit Limit: 2470 thousand gallons per year

Monitoring Frequency: MONTHLY

Averaging Method: ANNUAL MAXIMUM ROLLED MONTHLY

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.

Subsequent reports are due every 6 calendar month(s).

Condition 79: Compliance Certification
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable Federal Requirement: 6NYCRR 212.3(b)

Item 79.1:

The Compliance Certification activity will be performed for:

Emission Unit: R-ECOV B Emission Point: 00003

New York State Department of Environmental Conservation

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Facility DEC ID: 5154800008



Regulated Contaminant(s):

CAS No: 0NY075-00-0 PARTICULATES

Item 79.2:

Compliance Certification shall include the following monitoring:

Monitoring Type: INTERMITTENT EMISSION TESTING

Monitoring Description:

Emissions of solid particulates are limited to less than 0.150 grains of particulates per cubic foot of exhaust gas, expressed at standard conditions on a dry gas basis. Compliance testing will be conducted at the discretion of the Department.

Parameter Monitored: PARTICULATES

Upper Permit Limit: 0.15 grains per dscf

Reference Test Method: EPA Method 5

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Averaging Method: AVERAGING METHOD AS PER REFERENCE TEST METHOD INDICATED

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 10/30/2001.

Subsequent reports are due every 6 calendar month(s).



STATE ONLY ENFORCEABLE CONDITIONS

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

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

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

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

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

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

STATE ONLY APPLICABLE REQUIREMENTS

The following conditions are state applicable requirements and are not subject to compliance certification requirements unless otherwise noted or required under 6 NYCRR Part 201.

Condition 2-24: Contaminant List

Effective between the dates of 01/27/2003 and 06/19/2006

Applicable State Requirement: ECL 19-0301

Item 2-24.1:

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

CAS No: 007782-50-5



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Name: CHLORINE

CAS No: 0NY100-00-0

Name: HAP

CAS No: 0NY210-00-0

Name: OXIDES OF NITROGEN

CAS No: 0NY075-00-0

Name: PARTICULATES

CAS No: 007446-09-5

Name: SULFUR DIOXIDE

CAS No: 0NY500-00-0

Name: TOTAL REDUCED SULFUR

Condition 2-25: Unavoidable noncompliance and violations
Effective between the dates of 01/27/2003 and 06/19/2006

Applicable State Requirement: 6NYCRR 201-1.4

Item 2-25.1:

At the discretion of the commissioner a violation of any applicable emission standard for necessary scheduled equipment maintenance, start-up/shutdown conditions and malfunctions or upsets may be excused if such violations are unavoidable. The following actions and recordkeeping and reporting requirements must be adhered to in such circumstances.

(a) The facility owner and/or operator shall compile and maintain records of all equipment maintenance or start-up/shutdown activities when they can be expected to result in an exceedance of any applicable emission standard, and shall submit a report of such activities to the commissioner's representative when requested to do so in writing or when so required by a condition of a permit issued for the corresponding air contamination source except where conditions elsewhere in this permit which contain more stringent reporting and notification provisions for an applicable requirement, in which case they supercede those stated here. Such reports shall describe why the violation was unavoidable and shall include the time, frequency and duration of the maintenance and/or start-up/shutdown activities and the identification of air contaminants, and the estimated emission rates. If a facility owner and/or operator is subject to continuous stack monitoring and quarterly reporting requirements, he need not submit reports for equipment maintenance or start-up/shutdown for the facility to the commissioner's representative.

(b) In the event that emissions of air contaminants in excess of any emission standard in 6 NYCRR Chapter III Subchapter A occur due to a malfunction, the facility owner and/or operator shall report such malfunction by telephone to the commissioner's representative as soon as possible during normal working hours, but in any event not later than two working days after becoming aware that the malfunction occurred. Within 30 days thereafter, when requested in writing by the commissioner's



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representative, the facility owner and/or operator shall submit a written report to the commissioner's representative describing the malfunction, the corrective action taken, identification of air contaminants, and an estimate of the emission rates. These reporting requirements are superceded by conditions elsewhere in this permit which contain reporting and notification provisions for applicable requirements more stringent than those above.

(c) The Department may also require the owner and/or operator to include in reports described under (a) and (b) above an estimate of the maximum ground level concentration of each air contaminant emitted and the effect of such emissions depending on the deviation of the malfunction and the air contaminants emitted.

(d) In the event of maintenance, start-up/shutdown or malfunction conditions which result in emissions exceeding any applicable emission standard, the facility owner and/or operator shall take appropriate action to prevent emissions which will result in contravention of any applicable ambient air quality standard. Reasonably available control technology, as determined by the commissioner, shall be applied during any maintenance, start-up/shutdown or malfunction condition subject to this paragraph.

(e) In order to have a violation of a federal regulation (such as a new source performance standard or national emissions standard for hazardous air pollutants) excused, the specific federal regulation must provide for an affirmative defense during start-up, shutdowns, malfunctions or upsets.

Condition 84: Air pollution prohibited
Effective between the dates of 06/20/2001 and 06/19/2006

Applicable State Requirement: 6NYCRR 211.2

Item 84.1:

No person shall cause or allow emissions of air contaminants to the outdoor atmosphere of such quantity, characteristic or duration which are injurious to human, plant or animal life or to property, or which unreasonably interfere with the comfortable enjoyment of life or property. Notwithstanding the existence of specific air quality standards or emission limits, this prohibition applies, but is not limited to, any particulate, fume, gas, mist, odor, smoke, vapor, pollen, toxic or deleterious emission, either alone or in combination with others.

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

Condition 3-34: Compliance Demonstration
Effective between the dates of 12/15/2004 and 06/19/2006

Applicable State Requirement: 6NYCRR 237-1.4(c)(1)

Item 3-34.1:

The Compliance Demonstration activity will be performed for:

New York State Department of Environmental Conservation

Permit ID: 5-1548-00008/00081

Facility DEC ID: 5154800008



Emission Unit: P-OWERH

Item 3-34.2:

Compliance Demonstration shall include the following monitoring:

Monitoring Type: RECORD KEEPING/MAINTENANCE PROCEDURES

Monitoring Description:

This unit's electrical output supplied to the electric grid during a control period shall be less than or equal to 10 percent of the gross electrical output of the unit. This makes the unit exempt from the requirements of Part 237 except for the provisions of sections 237-1.2, 237-1.3, 237-1.4 and 237-1.7.

Monitoring Frequency: AS REQUIRED - SEE PERMIT MONITORING DESCRIPTION

Reporting Requirements: SEMI-ANNUALLY (CALENDAR)

Reports due 30 days after the reporting period.

The initial report is due 4/30/2005.

Subsequent reports are due every 6 calendar month(s).