PERMIT NO. 2631-127-0003-V-07-0 ISSUANCE DATE:



ENVIRONMENTAL PROTECTION DIVISION

Air Quality - Part 70 Operating Permit

| Facility Name: | Brunswick Cellulose LLC |
|-------------------------|---|
| Facility Address: | 1400 W Ninth Street Brunswick, Georgia 31521, Glynn County |
| Mailing Address: | PO Box 1438 Brunswick, Georgia 31521 |
| Parent/Holding Company: | GP-Cellulose, LP |

Facility AIRS Number: 04-13-127-00003

In accordance with the provisions of the Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq and the Georgia Rules for Air Quality Control, Chapter 391-3-1, adopted pursuant to and in effect under the Act, the Permittee described above is issued a Part 70 Permit for:

The operation of a Kraft pulp and paper mill.

This Permit is conditioned upon compliance with all provisions of The Georgia Air Quality Act, O.C.G.A. Section 12-9-1, et seq, the Rules, Chapter 391-3-1, adopted and in effect under that Act, or any other condition of this Permit. Unless modified or revoked, this Permit expires five years after the issuance date indicated above.

This Permit may be subject to revocation, suspension, modification or amendment by the Director for cause including evidence of noncompliance with any of the above, for any misrepresentation made in Title V Application TV-482579 signed on June 29, 2020, any other applications upon which this Permit is based, supporting data entered therein or attached thereto, or any subsequent submittal of supporting data, or for any alterations affecting the emissions from this source.

This Permit is further subject to and conditioned upon the terms, conditions, limitations, standards, or schedules contained in or specified on the attached **92** pages.



DRAFT

Richard E. Dunn, Director Environmental Protection Division

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PART 1.0 FACILITY DESCRIPTION

1.1 Site Determination

No site determination issues are apparent from the application.

1.2 Previous and/or Other Names

Brunswick Cellulose, Inc Georgia-Pacific Brunswick Operations Brunswick Pulp & Paper Company Georgia-Pacific Southeastern Chlorate Plant

1.3 Overall Facility Process Description

Woodyard

The Brunswick Mill woodyard operations include processing and storage of logs, bark, and chips. There are also operations for handling of purchased chips and bark. Logs and purchased chips are received in the woodyard via trucks or railcars. Upon receipt, the logs are stored in piles and are then transferred by cranes to the debarking drum for removal of bark. The bark is transferred via conveyors to the bark screen and then to one of two bark hogs, which are pieces of equipment that reduce the size of incoming material to uniformly sized chips. Bark can also be received via truck and stored on the bark pile until needed. Bark is eventually transferred to the bark bins to be used as fuel for the No. 4 Power Boiler (U700) via the Bark Transfer Cyclone (U703). Tire derived fuel (TDF) and wastewater treatment system sludge are also metered into the boiler feed system for combustion in the No. 4 Power Boiler via the Bark Transfer Cyclone.

From the debarking drum, debarked logs are processed into chips at the chipper. The chips are then transferred to chip screens for sizing. Screens are used to separate fines and oversized chips from the acceptable chips. Acceptable chips are conveyed to one of four chip silos to be fed to the digesters. Oversized chips are sent to the rechipper, and fines (*e.g.*, sawdust) are sent to the bark pile or to the bark bins.

Purchased chips, received separately from logs, are conveyed from truck unloading stations directly to the stacker/reclaimers and placed onto chip piles. Purchased bark and wood residuals are also received by trucks and conveyed to the bark pile via belt conveyors, either directly or after processing through one of two bark hogs as mentioned above. The Mill also receives chips, bark and wood residuals in live bottom trailers (trailers with conveyor belts to move material out of the trailer without it being raised), which are unloaded directly to chip and bark piles, or to staging areas near the piles and moved to the piles with a front-end loader.

Kraft Pulp Mill

The Kraft pulping process begins with the charging of chips into one or more of the nineteen (19) Batch Digesters (PG01). White liquor (a solution of sodium hydroxide and sodium sulfide) and residual weak black liquor are added to the digesters along with steam to "cook" the wood chips. After cooking in the digesters, the contents are blown to digester Blow Tanks (PG31). From the Blow Tanks, the pulp slurry is deknotted in the Knotters System (PG20 and PG21) and washed in one of the two Brownstock Washing Systems (PG27 and PG28) to recover residual weak black liquor. The

weak black liquor exiting the washers is collected in seal tanks, while the washed pulp is pumped to high density storage chests or to the two-stage Oxygen Delignification System (PG35). After the two-stage Oxygen Delignification process, the pulp is then washed in the first post-oxygen washing stage. Next, the pulp is pumped to the unbleached Brown Stock High Density Storage Tanks.

Turpentine is a principal byproduct of the Kraft pulping process and is recovered through a sequence of condensing and decanting in the Turpentine Recovery System (PG25). The recovered turpentine is stored in turpentine storage tanks prior to loading into trucks for shipment to customers. The LVHC NCGs are collected from all regulated equipment in the pulping process, primarily from the digesters, blow tanks, and turpentine recovery system, to control TRS and HAP emissions.

From the pulp storage chests, the pulp is pumped through the screening system and the screenaccepted pulp passes over another washer system, referred to as Deckers (PG23). From the Deckers, the pulp is pumped to the unbleached Brown Stock High Density Storage Tanks (PG15). Pulp from the Brownstock High Density Storage Tanks is sent to the pre-washer for the second stage of postoxygen washing, and then to the No. 4 Bleach Plant (BG08). The HVLC NCG from the Brownstock Washer system, the Oxygen Delignification System, the post Oxygen Delignification washer, and the Bleach Plant pre-washer are collected in the HVLC collection system for combustion in the No. 5 Recovery Furnace (R401) or in the No. 6 Recovery Furnace (R408) or in the Backup NCG Incinerator (R480).

Bleach Plant

The washed and screened pulp is converted to bleached stock in the No. 4 Bleach Plant (BG08). After bleaching, stock is sent to the Bleached Pulp Storage Tanks (BG05). The bleach plant area also includes the Chlorine Dioxide (ClO₂) Generation Plants (B237 and B250). The bleach plant emissions, with the exception of the extraction stage tower and washer, are controlled with the use of closed vent systems that direct emissions from all regulated points to the bleach plant scrubber (BPS4) to minimize emissions are vented directly to the atmosphere.

The Brunswick Mill operates the SVP-Lite ClO_2 generator (B250), which uses methanol as the reducing agent to reduce sodium chlorate and sulfuric acid to gaseous ClO_2 . The gaseous ClO_2 is mixed with chilled water in an adsorption tower to make a ClO_2 solution. The ClO_2 solution is stored in a series of storage tanks and is used as a bleaching chemical in the No. 4 Bleach Plant. The emissions from the ClO_2 storage tanks are controlled by the No. 4 Bleach Plant scrubber (BPS4). The emissions from the SVP- Lite ClO_2 generator (B250) are controlled by a dedicated scrubber (BPS2). The emissions from the Methanol Storage Tank (B261) are vented to the atmosphere.

<u>Tall Oil Plant</u>

Tall Oil is a by-product of the Kraft pulping process and is recovered by processing soap removed from black liquor in the Tall Oil Plant (T313). Soap from weak liquor tanks and evaporator soap skimmers is pumped to soap settling tanks. Soap is converted to Tall Oil by reacting it with sulfuric acid and steam. Tall Oil is separated from the resulting brine and dewatered by processing through two centrifugal separators. The brine is neutralized with caustic prior to being sent back to the digesters. Tall Oil is stored in Tall Oil storage tanks prior to loading into trucks for shipment to customers. A wet scrubber (TSTS) is used to control TRS emissions from the Tall Oil Plant.

Chemical Recovery

Black liquor recovered in the pulp washing step is processed in the chemical recovery process to recover the pulping chemicals. The recovery process begins when residual weak black liquor is recovered from cooked pulp in the Kraft brownstock washing areas. The weak black liquor from the process is routed through the black liquor filters and then into the weak black liquor storage tanks. From the weak black liquor storage tanks, the weak black liquor is routed through the multiple effect evaporator (MEE) system (RG10), consisting of a pre-evaporator, two sets of evaporators (Nos. 5 and 6) and the No. 2 concentrator, to increase the solids content of the liquor to approximately 72%. Black liquor from the MEE system is sent to the strong black liquor storage tanks.

The MEE system includes a condensate stripper system consisting of the Nos. 1 and 2 Steam Strippers (R441 and R500). The off gas from these strippers, referred to as SOGs, is sent to a Methanol Rectifier System (R489) and condenser designed to produce a nominal 80% liquid methanol. The liquid methanol is blended with black liquor solids (BLS) prior to being burned in either the No. 5 Recovery Furnace (R401) or in the No. 6 Recovery Furnace (R407). The MEE system also includes a Methanol Storage Tank (R490) which is utilized during extended outage periods when BLS cannot be processed in the Nos. 5 and 6 Recovery Furnaces. Additionally, the MEE system includes a soap skimmer with associated storage tanks. The soap skimmer is a tank that has a rake and internal compartment. Black liquor from the evaporator system is pumped to the soap skimmer, where the rake is used to remove the soap. The black liquor is then pumped back to the evaporator system. The NCGs from the MEE system are collected in the LVHC collection system.

In the Mill's two recovery furnaces (R401 and R407), the organic material present in the liquor is oxidized as the carbon is burned away and the inorganic compounds are smelted in reduction reactions. The molten inorganic chemicals, or smelt, consisting primarily of sodium carbonate (Na₂CO₃), collect in the bottom of the recovery furnaces, and pour out of spouts into the associated smelt dissolving tanks (R403 and R408). Salt cake, reclaimed from the economizer and the electrostatic precipitator (operated to control emissions of particulate matter), is mixed with black liquor and recycled back into the liquor system via black liquor/salt cake mix tanks and the precipitator mix tanks. The salt cake/black liquor mixture is either burned in the recovery furnaces or sent to a strong black liquor storage tank. The No. 5 Recovery Furnace is equipped to fire natural gas, No. 6 fuel oil, and methanol recovered from the Methanol Rectifier system. In addition, the recovery furnaces are also used as a primary combustion device to thermally oxidize the LVHC and HVLC NCGs from the pulping and recovery processes collected in the LVHC and HVLC collection systems. Particulate matter emissions from the recovery furnaces are controlled by dedicated electrostatic precipitators (ESPs) (REP5 and REP6).

In the Nos. 5 and 6 Smelt Dissolving Tanks (R403 and R408), smelt from the recovery furnaces is dissolved in weak wash from the causticizing area and fresh water to form green liquor. Scrubbers (RSS5 and RSS6) on the smelt dissolving tank vents use weak wash and water as scrubbing liquids to control the emissions of particulate matter and reduced sulfur compounds.

Recausticizing Area

Green liquor exiting the smelt dissolving tanks is routed to two stabilization/storage tanks and then to the green liquor clarifiers. In the clarifiers, dregs (settleable solids) are removed from the liquor. The clarified green liquor is then routed to storage tanks, while the dregs are filtered/washed and sent for beneficial reuse or for disposal. Filtrate (weak wash) from the dregs wash/filter operation is recycled to the mud washing system for reuse in the system and as scrubbing liquid in the smelt dissolving tank scrubbers.

Clarified green liquor from the green liquor storage tanks and lime (calcium oxide, CaO) from the lime silos are fed to the East and West Slakers (L511 and L514). The green liquor/lime mixture is agitated, heat is produced from the exothermic reaction, and slaked lime (calcium hydroxide, CaOH) is produced. The unreacted solids (grit) are removed in the slakers and sent to the Grit Washer (L517). After slaking, the mixture is then routed to the Nos.1, 2, 3, and 4 Causticizers (L552, L553, L554, and L555), where the slaked lime reacts with the sodium carbonate in the green liquor to form sodium hydroxide (and calcium carbonate, a solid), to produce white liquor. The white liquor also includes the sodium sulfide which is carried through the recovery and causticizing operations in the various liquors.

White liquor exiting the causticizers is routed to the white liquor splitter box for distribution into the white liquor clarifiers, where the white liquor is clarified to remove lime mud (primarily calcium carbonate). The clarified white liquor is then routed to white liquor storage tanks, where it is held prior to its introduction again into the digesters for the pulping operation.

The lime mud is washed, stored and filtered prior to introduction into the No. 5 Lime Kiln (L537). Weak wash from the mud washers is recycled to the weak wash storage tanks for use in the smelt dissolving tanks and for use as scrubbing liquid for the No. 4 Bleach Plant scrubber. The No. 5 Lime Kiln fires natural gas and No. 6 fuel oil to heat the lime mud to first dry it and then drive off carbon dioxide from the calcium carbonate to make lime. The lime exiting the No. 5 Lime Kiln is transported to the East and West Lime Storage Silos (L540 and L541). Particulate matter emissions from the No. 5 Lime Kiln are controlled by an ESP (LEP1) followed by a venturi scrubber (LKS1). Baghouses (LBH1 and LBH2) are used on the East and West Lime Storage Silos to control emissions of particulate matter.

Paper Machine Area

The Brunswick Mill operates three paper machines (MG04, MG05, and MG06), also referred to as pulp dryers, which manufacture fluff pulp. The machine area encompasses fiber processing from the high-density bleached stock storage chests to finished product loaded for shipment. Stock from the high-density storage chests is routed through a series of chests and screens where the stock is diluted, mixed, and screened to a uniform consistency. The diluted stock is then fed to the headboxes of one of the three machines (Nos. 3, 4, and 5 Pulp Dryers). Chemical additives that contain small quantities of VOCs are used during these steps to maintain quality and meet customer specifications. A sheet of fiber is formed on the wire and the process of removing water from the sheet begins by pulling a vacuum on the wire felt. Water removal continues as the fiber sheet goes through the press and dryer sections of the machines. White water that is drained from the machines is returned to a central white water system in the bleach plant. The reels from the machines are transferred by cranes to winders. Finished rolls from the reel are wrapped prior to being shipped off site.

Fugitive particulate matter emissions and small quantities of VOCs from chemical additives are generated by the paper machines as pulp is produced. In addition, particulate matter emissions from the No. 4 Paper Machine winder operation are controlled by a wet scrubber for employees' comfort.

Control of LVHC and HVLC Gases and Pulping Condensates

In the Kraft pulp manufacturing processes, NCGs are generated, containing reduced sulfur compounds and various other organic compounds. The NCGs are collected in the LVHC system from the Nos. 1-19 Batch Digesters (PG01), the Blow Tanks (PG31), the Turpentine Recovery System (PG25), the Evaporator Group (RG10), and the No. 2 Concentrator (R484). The individual NCGs are combined and combusted in either the recovery furnaces or the Backup NCG Incinerator. Gases from the incinerator are scrubbed prior to exhausting to the atmosphere.

Foul process condensates requiring control under NESHAP Subpart S (the "Cluster Rule"), selected contaminated condensates, and condensates from low point drains in the NCG system are combined and treated in the Nos. 1 and 2 Steam Strippers. The off gas from these strippers, referred to as SOGs, is sent to the Methanol Rectifier system and condenser designed to produce a nominal 80% liquid methanol. The off gases from the Methanol Rectifier system are burned as a part of the NCG stream that is fed to either the recovery furnaces or the Backup NCG Incinerator.

The HVLC NCGs from the brownstock washers (PG27 and PG28) and the Oxygen Delignification System (PG35) are also combusted in either the recovery furnaces or the Backup NCG Incinerator (R480).

Utilities

The Brunswick Mill has three boilers that have the primary purpose of providing steam for process operations and generating electrical power for internal Mill use.

The No. 4 Power Boiler (U700) fires carbonaceous fuel, consisting of wood materials such as bark, chips, and sawdust; No. 6 fuel oil; natural gas; wastewater treatment system sludge; and tire-derived fuel (TDF). The No. 4 Boiler is capable of providing the Mill with 525,000 lbs/hr of steam. The No. 4 Power Boiler is equipped with an ESP (UEP4) to control emissions of particulate matter.

The No. 6 Power Boiler (U706) is rated to produce 250,000 lbs/hr of steam. The No. 6 Boiler fires natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, used primarily during curtailment periods.

The No. 7 Power Boiler (U707) is rated to produce 150,000 lbs/hr of steam. The No. 7 Boiler fires natural gas as a primary fuel and No. 2 fuel oil as a backup fuel, used primarily during curtailment periods.

The Brunswick Mill also operates three turbine generators to produce electricity from the highpressure steam produced by the boilers. All power produced is used by the Mill. No power is sold to the grid.

Wastewater Treatment System

Two main process sewers serve the Brunswick Mill. An acid sewer handles the effluent from the acid stages in the No. 4 Bleach Plant. The wastewater in the acid sewer flows by gravity to the wastewater treatment lagoon. The Mill main flume flows to a lift station, where submersible pumps transfer the effluent to a clarifier. Clarified effluent is released to a junction box, where it mixes with the acid wastewater sewer. The underflow from the clarifier goes to a screw press, which dewaters the solids and transfers them to a storage pile. The solids from the storage pile are either sold to a vendor for beneficial reuse or burned in the No. 4 Power Boiler.

The mixed wastewater effluent is sent through a pre-settling basin, which must occasionally be dredged to remove the build-up of solids. The wastewater is then treated in an Aerated Stabilization Basin (ASB). Liquid nutrient and biological augmentation are added as necessary. After final clarification in a quiescent section of the ASB, the treated wastewater effluent is discharged to the Turtle River.

Miscellaneous Industrial Activities

The Mill also includes miscellaneous process operations that support the manufacturing of pulp and paper. As is typical for a large industrial facility, the Mill operates small stationary and portable engines (some of which may be temporary and have associated small fuel tanks); has equipment that contains chlorofluorocarbons (CFCs); uses parts washers; and stores gasoline, lubricants, and other fuels onsite for use in vehicles and maintenance equipment which are used on the site. The Mill has paved roadways. The Mill also conducts other miscellaneous insignificant activities, such as storing chemicals in small drums and totes, blast cleaning and painting of structural components, machining and welding, fire training activities, and operating laboratory hoods.

PART 2.0 REQUIREMENTS PERTAINING TO THE ENTIRE FACILITY

2.1 Facility Wide Emission Caps and Operating Limits

None applicable.

2.2 Facility Wide Federal Rule Standards

None applicable.

2.3 Facility Wide SIP Rule Standards

None applicable.

2.4 Facility Wide Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

None applicable.

PART 3.0 REQUIREMENTS FOR EMISSION UNITS

Note: Except where an applicable requirement specifically states otherwise, the averaging times of any of the Emissions Limitations or Standards included in this permit are tied to or based on the run time(s) specified for the applicable reference test method(s) or procedures required for demonstrating compliance.

3.1 Emission Units

| Emission Units | | Applicable | Air | Air Pollution Control Devices | |
|----------------|-----------------------------|-------------------------------|--------|-------------------------------|--|
| ID No. | Description | Requirements/Standards | ID No. | Description | |
| R401 | No. 5 Recovery Furnace | 40 CFR 52.21 | REP5 | No. 5 Recovery Furnace ESP | |
| | | 40 CFR 63 Subpart S | | | |
| | | 40 CFR 63 Subpart MM | | | |
| | | 391-3-102(2)(b) | | | |
| | | 391-3-102(2)(e) | | | |
| | | 391-3-102(2)(g) | | | |
| | | 391-3-102(2)(gg) | | | |
| R407 | No. 6 Recovery Furnace | 40 CFR 52.21 | REP6 | No. 6 Recovery Furnace ESP | |
| | | 40 CFR 60 Subpart Db | | | |
| | | 40 CFR 60 Subpart BB | | | |
| | | 40 CFR 63 Subpart S | | | |
| | | 40 CFR 63 Subpart MM | | | |
| | | 391-3-102(2)(b) | | | |
| | | 391-3-102(2)(e) | | | |
| | | 391-3-102(2)(g) | | | |
| R403 | No. 5 Smelt Dissolving Tank | 40 CFR 60 Subpart BBa | RSS5 | No. 5 Smelt Tank Scrubber | |
| | | 40 CFR 63 Subpart MM | | | |
| | | 391-3-102(2)(b) | | | |
| | | 391-3-102(2)(e) | | | |
| | | 391-3-102(2)(gg) | | | |
| R408 | No. 6 Smelt Dissolving Tank | 40 CFR 52.21 | RSS6 | No. 6 Smelt Tank Scrubber | |
| | | 40 CFR 60 Subpart BBa | | | |
| | | 40 CFR 63 Subpart MM | | | |
| | | 391-3-102(2)(b) | | | |
| | | 391-3-102(2)(e) | | | |
| | | 391-3-102(2)(gg) | | | |
| R484 | No. 2 Concentrator | 40 CFR 60 Subpart BB | R401 | No. 5 or No. 6 Recovery | |
| | | 40 CFR 63 Subpart S | R407 | Furnace | |
| | | 391-3-102(2)(gg) | R480 | Backup NCG Incinerator | |
| R480 | Backup NCG Incinerator | 40 CFR 52.21 | RIS1 | Backup NCG Incinerator | |
| | | 40 CFR 63 Subpart S | | Scrubber | |
| | | 40 CFR 60 Subpart BB | | | |
| | | 391-3-102(2)(b) | | | |
| U700 | No. 4 Power Boiler | 40 CFR 52.21 | UEP4 | No. 4 Power Boiler ESP | |
| | | 40 CFR 61 Subpart E | | | |
| | | 391-3-102(2)(b) | | | |
| | | 391-3-102(2)(d) | | | |
| | | 391-3-102(2)(g) | | | |
| | | 40 CFR 63 Subpart DDDDD | | | |
| U706 | No. 6 Power Boiler | 40 CFR 60 Subpart Db | None | None | |
| | | 391-3-102(2)(d) | | | |
| | | 391-3-102(2)(g) | | | |
| U707 | No. 7 Power Boiler | 40 CFR 60 Subpart Db | None | None | |
| | | 391-3-102(2)(d) | | | |
| | | 391-3-102(2)(g) | | | |

| ID No. L537 | Emission Units Description No. 5 Lime Kiln | Applicable Requirements/Standards 40 CFR 60 Subpart BB | ID No. LEP1 | Description Lime Kiln ESP |
|-----------------------|--|--|-----------------|---------------------------|
| | No. 5 Lime Kiln | 40 CFR 60 Subpart BB | LEP1 | Lime Kiln ESP |
| D 490 | | | | Line Rin Loi |
| D 480 | | 40 CFR 63 Subpart MM | LKS1 | Lime Kiln Scrubber |
| D 490 | | 391-3-102(2)(b) | | |
| D 490 | | 391-3-102(2)(e) | | |
| R489 | | 391-3-102(2)(g) | | |
| K409 | Methanol Rectifier | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | | * | R407 | No. 6 Recovery Furnace |
| | | | | Backup NCG Incinerator |
| | | | R480 | |
| R490 | Rectified Methanol Storage Tank | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | | ··· ···· | R407 | No. 6 Recovery Furnace |
| | | | Rior | Backup NCG Incinerator |
| | | | D 490 | |
| PG20 | Hardwood Knotters (P110-P114) | 40 CFR 63 Subpart S | R480 None | None |
| PG21 | Softwood Knotters (P155-P159) | 40 CFR 63 Subpart S | None | None |
| PG22 | Softwood Screens (P124-P134) | 40 CFR 63 Subpart S | None | None |
| PG23 | Softwood Screen & Deckers | 40 CFR 63 Subpart S | None | None |
| | (P189-P193) | _ | | |
| PG25 | Turpentine Recovery System | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | (100V, 423V- 425V, R455, P197, | | R407 | No. 6 Recovery Furnace |
| | P198, P205) | | | Backup NCG Incinerator |
| | | | R480 | |
| PG27 | Hardwood Washer (P115-P121) | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | | | R407 | No. 6 Recovery Furnace |
| | | | R480 | Backup NCG Incinerator |
| PG28 | Softwood Washers (P160-P168) | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | | | R407 | No. 6 Recovery Furnace |
| | | | R480 | Backup NCG Incinerator |
| PG29 | Hardwood Deckers (P136, P127, & P140) | 40 CFR 63 Subpart S | None | None |
| PG35 | Oxygen Delignification System | 40 CFR 63 Subpart S | R401 | No. 5 Recovery Furnace |
| | (P220-P229) (P223 – P229) | | R407 | No. 6 Recovery Furnace |
| PG30 | Brownstock Washer System | 40 CFR 52.21 | R401 | No. 5 Recovery Furnace |
| | | 40 CFR 60 Subpart BB | R407 | No. 6 Recovery Furnace |
| | | 40 CFR 60 Subpart BBa | R480 | Backup NCG Incinerator |
| | | 40 CFR 63 Subpart S | | |
| PG31 | Blow Tanks (P194-P196, R454) | 40 CFR 63 Subpart S | R441 | Steam Stripper |
| | | 40 CFR 60 Subpart BB | | No. 5 or No. 6 Recovery |
| | | (P196 only) | | Furnace |
| | | | R480 | Backup NCG Incinerator |
| R441 | No. 1 Steam Stripper | 40 CFR 60 Subpart BB | R401 | No. 5 Recovery Furnace |
| | | 40 CFR 63 Subpart S | R407 | No. 6 Recovery Furnace |
| | | - | | Backup NCG Incinerator |
| | | | R480 | |
| R500 | No. 2 Steam Stripper | 40 CFR 60 Subpart BB | R400 | No. 5 Recovery Furnace |
| | | 40 CFR 63 Subpart S | R401 R407 | No. 6 Recovery Furnace |
| | | | | Backup NCG Incinerator |
| | | | D 100 | |
| DC01 | Nos 1 10 Batch Digastors (D101 | 40 CEP 52 21 | R480 R401 | No. 5 Pacovoru Eurocco |
| | Nos. 1-19 Batch Digesters (P101- | 40 CFR 52.21 | | No. 5 Recovery Furnace |
| PG01 | 108, P141-151) | 40 CFR 63 Subpart S | R407 | No. 6 Recovery Furnace |
| PG01 | | 201.2.1.02(2)() | D 400 | Dealure MCC I |
| PG01 | | 391-3-102(2)(gg) 40 CFR 60 Subpart BB | R480 | Backup NCG Incinerator |

| Emission Units | | Applicable | Air | Air Pollution Control Devices | |
|----------------|--|------------------------------------|--------------|-------------------------------|--|
| ID No. | Description | Requirements/Standards | ID No. | Description | |
| RG10 | Evaporator Group (R425, R438, | 40 CFR 52.21 | R401 | No. 5 Recovery Furnace | |
| ROID | R495) | 40 CFR 63 Subpart S | R401 R407 | No. 6 Recovery Furnace | |
| | R())) | 391-3-102(2)(gg) | R480 | Backup NCG Incinerator | |
| | | 40 CFR 60 Subpart BB | Ribb | Duckup 1100 memerator | |
| | | (R438 and R495 only) | | | |
| BG08 | No. 4 Bleach Plant | 40 CFR 52.21 | BPS4 | No. 4 Bleach Plant Scrubber | |
| 2000 | | 40 CFR 63 Subpart S | 515. | | |
| | | Georgia Air Toxics | | | |
| BG03 | Bleach Plant 2 nd Stage Washers | Georgia Air Toxics | None | None | |
| 2000 | (not routed to scrubber (B246 & | | 1 tone | 1,0110 | |
| | B248) | | | | |
| BG07 | Bleach Plant 2 nd & 4 th Stage | Georgia Air Toxics | None | None | |
| 2007 | Towers (B242-B245, B247, | Coolgia I III Toxics | rtone | itone | |
| | B249) | | | | |
| B250 | SVP-Lite Generator | Georgia Air Toxics | BPS2 | SVP-Lite Tail Gas Scrubber | |
| B261 | No. 1 Methanol Storage Tank | 40 CFR 60 Subpart Kb | None | None | |
| LG08 | Causticizers (L552-L555) | 40 CFR 52.21 | None | None | |
| LG00 LG09 | East and West Lime Slakers | 40 CFR 52.21 | LSSE | East West Lime Slaker | |
| L007 | (L511 and L514) | 40 CFR 52.21 391-3-102(2)(b) | LSSE | Scrubber | |
| | (LSTT and LST4) | 391-3-102(2)(b) 391-3-102(2)(e) | LSSW | Schubber | |
| L517 | Grits Washer | None* | None | None | |
| MG10 | Nos. 3, 4 & 5 Paper Machines & | 40 CFR 52.21 | None | None | |
| MG10 | | 40 CFK 52.21 | None | None | |
| | associated equipment (M601, M609, M625, M627 – | | | | |
| | M630, M632 - M635, M648 - | | | | |
| | | | | | |
| | M652, M660, M663, M668 – M671) | | | | |
| U703 | Bark Transfer Cyclone | 40 CFR 52.21 | None | None | |
| 0705 | Bark Transfer Cyclone | 391-3-102(2)(b) | None | None | |
| | | 391-3-102(2)(b) 391-3-102(2)(e) | | | |
| PC01 | Petroleum Coke Grinding | 40 CFR 52.21 | BIN1 | Pet Coke Baghouse | |
| FC01 | Operations | 40 CFR 52.21 391-3-102(2)(b) | BIN1 BIN2 | Grinding Baghouse | |
| | Operations | 391-3-102(2)(e) | BIN2 BIN3 | Storage Silo Bin Vent | |
| | | 391-3-102(2)(g) | DING | Storage Sho Bin Vent | |
| L540 | West Lime Storage Silo | 391-3-102(2)(b) | LBH2 | West Lime Silo Baghouse | |
| LJ40 | west Line Storage Sho | 391-3-102(2)(e) | LDHZ | west Line Sho Baghouse | |
| L541 | East Lime Storage Silo | 391-3-102(2)(b) | LBH1 | East Lime Silo Baghouse | |
| LJ41 | East Line Storage Sho | 391-3-102(2)(b) 391-3-102(2)(e) | LDII | East Line Sho Baghouse | |
| 0000 | A grated Stabilization Desin | | None | None | |
| O900 | Aerated Stabilization Basin | <u>391-3-102(2)(a)(10)</u> | None | None | |
| WY01 | Woodyard Equipment (W001 – W086) – Chip Thickness | 391-3-102(2)(n) | None | None | |
| | | | | | |
| OG01 | Screening System - W090 Wastewater Treatment System | None* | Nona | None | |
| 0001 | 5 | None | None | None | |
| | (O900, O908, O912, O913, O922, | | | | |
| I COC | 0923 & 0924) | 201.2.1.02(2)(m) | Nana | Naza | |
| LG06 | Misc. Fugitive Recaust. Sources | 391-3-102(2)(n) | None | None | |
| | (L500-L509, L517-L536, L542- | | | | |
| L C 10 | L554) | 201.2.1.02(2)(x) | Nana | Neze | |
| LG10 | Lime Handling System (555I – | 391-3-102(2)(n) | None | None | |
| LC11 | 557I) | 201.2.1.02(2)(m) | N | Nege | |
| LG11 | Lime Mud Filters | 391-3-102(2)(n) | None | None | |
| | (North and South) | | | | |
| D 100 | (L542 & L543) | | | N | |
| P199 | Hardwood Soap Recovery Tank | None* | None | None | |
| RG04 | No. 6 Recovery Furnace Tanks | None* | None | None | |
| | (R409, R410, R411) | | | | |
| RG05 | Heavy Black Liquor Tanks | None* | None | None | |
| | (R425, R427, R429, & R430) | | | | |

| | Emission Units | Applicable | Air | Pollution Control Devices |
|--------|---|--|--------------|--|
| ID No. | Description | Requirements/Standards | ID No. | Description |
| RG07 | Weak Black Liquor Storage Tanks (P207, R412, R413, R416, R417, R431, R433 & R435) | None* | None | None |
| RG08 | Intermediate Black Liquor Storage Tanks (R418, R419, R420, R422 & R423) | None* | None | None |
| RG06 | No. 5 Recovery Furnace Tanks (R404 & R405) | None* | None | None |
| PG15 | Hardwood and Softwood Brownstock Chests (110V, 111V, 112V, P122, P138, P192, P206) | None* | None | None |
| BG05 | Bleached Pulp Hi-Density Storage Units (B251-B257) | None* | None | None |
| B258 | Alkaline Sewer Stack (Caustic scrubber) | None* | None | None |
| B259 | Acid Sewer | None* | None | None |
| PG32 | Knotters System (P234 – P238) | 40 CFR 60 Subpart BBa 40 CFR 63 Subpart S | R401 R407 | No. 5 Recovery Furnace No. 6 Recovery Furnace |
| PG33 | Screens System (P239 – P242) | 40 CFR 63 Subpart S | R401 R407 | No. 5 Recovery Furnace No. 6 Recovery Furnace |
| PG34 | Foam and Filtrate Tanks (P243 – P248) | 40 CFR 60 Subpart BBa 40 CFR 63 Subpart S | R401 R407 | No. 5 Recovery Furnace No. 6 Recovery Furnace |
| P207 | Knot Tank | 40 CFR 63 Subpart S | None | None |
| ROAD | Roads | 391-3-102(2)(n) | None | None |

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

** Per Application No. 607947, the bold equipment is new and will go into effect upon startup. The crossed-through equipment will be shut down and removed after the new equipment is brought into service.

3.2 Equipment Emission Caps and Operating Limits

Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706, and U707)

- 3.2.1 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No.
 4 Power Boiler, any gases which contain filterable particulate matter (FPM) emissions in excess of 0.05 lb/MMBtu heat input.
 [40 CFR 52.21 BACT Limit]
- 3.2.2 The Permittee shall burn no more than 100 tons/day of tire derived fuel (TDF) and/or 70 bone dry tons/day of sludge in the No. 4 Power Boiler.
 [40 CFR 52.21 Avoidance]
- 3.2.3 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No. 4 Power Boiler, any gases which contain the following:
 - a. Sulfur dioxide (SO₂) emissions in excess of 2,002 tons during any consecutive 12-month period.
 [40 CFR 52.21 Avoidance]

- Sulfur dioxide (SO₂) emissions in excess of 568 tons during any consecutive 12-month period.
 [40 CFR 51.308 Regional Haze]
- 3.2.4 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No.
 4 Power Boiler, any gases which contain nitrogen oxides (NO_X) emissions in excess of 682 tons during any consecutive 12-month period.
 [40 CFR 52.21 Avoidance]
- 3.2.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No.
 4 Power Boiler, any gases which contain carbon monoxide (CO) emissions in excess of 1,183 tons during any consecutive 12-month period.
 [40 CFR 52.21 Avoidance]
- 3.2.6 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No. 4 Power Boiler, any gases which contain volatile organic compounds (VOC) emissions in excess of 63 tons during any consecutive 12-month period. [40 CFR 52.21 Avoidance]
- 3.2.7 The Permittee shall combust no more than 2,508,114 gallons of No. 2 fuel oil during any consecutive 12-month period in the No. 6 Power Boiler.
 [40 CFR 52.21 Avoidance and 40 CFR 60 Subpart Db SO₂ Monitoring Avoidance]
- 3.2.8 The Permittee shall combust no more than 1,050,000 gallons of fuel oil in the No. 7 Power Boiler during any consecutive 12-month period.
 [40 CFR 52.21 Avoidance and 40 CFR 60 Subpart Db – Opacity Monitoring Avoidance]
- 3.2.9 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No.
 7 Power Boiler, nitrogen oxide (NO_X) emissions in excess of 39.1 tons during any consecutive 12-month period.
 [40 CFR 52.21 Avoidance]

Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407)

- 3.2.10 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 5 Recovery Furnace, any gases which:
 - a. Contain total reduced sulfur (TRS) compounds in excess of the following:
 - i. 20 ppm by volume (corrected to 8% oxygen). [391-3-1-.02(2)(gg)1(i)(I)]
 - b. Contain filterable particulate matter (FPM) emissions in excess of the following:
 - i. 0.044 gr/dscf (corrected to 8% oxygen); [40 CFR 63.862(a)(1)(i)(A)]

- 3.2.11 The Permittee shall not burn more than 2,100,000 gallons of fuel oil per consecutive 12-month period in the No. 5 Recovery Furnace.
 [40 CFR 52.21 Avoidance]
- 3.2.12 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 6 Recovery Furnace, any gases which:
 - a. Contain filterable particulate matter (FPM) emissions in excess of 0.021 gr/dscf (corrected to 8% oxygen).
 [40 CFR 52.21 BACT Limit; 40 CFR 60.282(a)(1)(i) and 40 CFR 63.862(a)(1)(i)(A) subsumed]
 - b. Contain FPM in excess of 53.7 lb/hr. [40 CFR 52.21 BACT Limit]
 - c. Contain total reduced sulfur (TRS) compounds in excess of 5 ppm by volume (corrected to 8% oxygen).
 [40 CFR 60.283(a)(2)]
 - Contain sulfur dioxide (SO₂) in excess of 200 lbs/hr.
 [40 CFR 52.21 BACT Limit]
 - e. Contain SO₂ emissions in excess of 180 ppm by volume (corrected to 3% oxygen). [40 CFR 52.21 BACT Limit]
 - f. Contain nitrogen oxides (NO_X) emissions in excess of 100 ppm by volume (corrected to 8% oxygen).
 [40 CFR 52.21 BACT Limit]
 - g. Exhibit an opacity of 35% or greater. [40 CFR 60.282(a)(1)(ii)]
 - h. Contain carbon monoxide (CO) emissions in excess of 300 ppm by volume (corrected to 8% oxygen).
 [40 CFR 52.21 BACT Limit]
 - i. Contain volatile organic compounds (VOC) emissions in excess of 0.04 lb/MMBtu. [40 CFR 52.21 BACT Limit]
 - j. Contain hydrogen sulfide (H₂S) emissions in excess of 4 ppm by volume (corrected to 8% oxygen).
 [40 CFR 52.21 BACT Limit]
- 3.2.13 All fuel oil burned in the No. 6 Recovery Furnace shall meet the definition of "very low sulfur oil" in 40 CFR 60.41b.
 [40 CFR 60.41b; 391-3-1-.02(2)(g)2 subsumed]

3.2.14 The Permittee shall not burn more than 1,540,012 gallons of fuel oil per consecutive 12-month period in the No. 6 Recovery Furnace.
 [40 CFR 52.21 Avoidance]

Nos. 5 and 6 Smelt Dissolving Tanks (Source Codes R403 and R408)

- 3.2.15 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 5 Smelt Dissolving Tank, any gases which:
 - a. Contain total reduced sulfur (TRS) compounds in excess of 0.0168 lb/ton black liquor solids (dry weight).
 [391-3-1-.02(2)(gg)1(iii); 40 CFR 60.283a(a)(4) subsumed]
 - b. Contain filterable particulate matter (FPM) emission in excess of 0.20 lb/ton black liquor solids (dry weight).
 [40 CFR 63.862(a)(1)(i)(B); 40 CFR 60.282a(a)(3)]
- 3.2.16 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 6 Smelt Dissolving Tank, any gases which:
 - a. Contain filterable particulate matter (FPM) emissions in excess of 0.20 lb/ton black liquor solids (dry weight).
 [40 CFR 52.21 BACT Limit, 40 CFR 60.282a(a)(3), and 40 CFR 63.862(a)(1)(i)(B)]
 - b. Contain FPM in excess of 18.80 lb/hr. [40 CFR 52.21 BACT Limit]
 - c. Contain total reduced sulfur (TRS) compounds in excess of 0.0168 lb/ton black liquor solids (dry weight).
 [391-3-1-.02(2)(gg)1(iii); 40 CFR 60.283a(a)(4) subsumed]
 - Contain sulfur dioxide (SO₂) in excess of 5.70 lb/hr.
 [40 CFR 52.21 BACT Limit]
 - e. Contain SO₂ emissions in excess of 0.062 lb/ton black liquor solids (dry weight). [40 CFR 52.21 BACT Limit]

Bleach Plants

State Only Enforceable Condition

3.2.17 The Permittee shall not discharge or cause the discharge into the atmosphere from the combination of all of the sources listed below ("Source List") any gases which are in excess of that allowed by Georgia's <u>Guideline for Ambient Impact Assessment of Toxic Air</u> <u>Pollutant Emissions</u>, as demonstrated by air dispersion modeling ("Limits"). [391-3-1-.02(2)(a)10]

Source List

| Source Code | Source | Control System | Control ID |
|----------------|-------------------------------------|-----------------------------|---------------|
| B250 | SVP-LITE CLO ₂ generator | SVP Lite Tail Gas Scrubber | BPS2 |
| BG08 | No. 4 Bleach Plant | No. 4 Bleach Plant Scrubber | BPS4 |

Limits

| Source Code | Cl ₂ Limit (lb/hour) | ClO ₂ Limit (lb/hour) |
|-------------|---------------------------------|----------------------------------|
| B250 | 0.12 | 0.79 |
| BG08 | 6.50 | 3.81 |

- 3.2.18 The Permittee shall not discharge nor cause the discharge to the atmosphere from the No. 4 Bleach Plant (Source Code BG08) any gases which contain the following:
 - a. 1.69 lb/UODTP (unbleached oven-dried tons pulp) of carbon monoxide (CO). [40 CFR 52.21 BACT Limit]
 - b. 0.092 lb/ADTP of volatile organic compounds (VOC). [40 CFR 52.21 BACT Limit]

Causticizer Area (Source Codes L556, L557, and L558)

3.2.19 For the modifications described in Application No, 16576, the Permittee shall use only freshwater in the causticizing area, including the Recausticizer, Green Liquor Clarifier, and Lime Mud Washer.
 [40 CFR 52.21 BACT Work Practice]

Paper Machines (Source Code MG10)

- 3.2.20 The Permittee shall conduct the following in order to reduce emissions for the Paper Machines: [40 CFR 52.21 BACT Work Practice]
 - a. A final rinse to the pulp at the bleach plant prior entering the Paper Machines with either freshwater or whitewater to reduce volatile organic compound (VOC) emissions.

- b. Use non-VOC containing or negligible-VOC content additives in the Paper Machines. Negligible VOC content means that additives contain less than 10% VOC on average, except for debonding agents which may contain up to 20% VOC on average.
- c. If using a solid powder additive, it will be handled in an enclosure in order to minimize filterable particulate matter (FPM) emissions.

Backup NCG Incinerator/Scrubber System (Source Codes R480 and RIS1)

- 3.2.21 The Permittee shall not discharge or cause the discharge into the atmosphere from the Backup NCG Incinerator/Scrubber System any gases which contain sulfur dioxide (SO₂) emissions in excess of 9.1 lb/hr. [40 CFR 52.21 Avoidance]
- 3.2.22 The Permittee shall not discharge or cause the discharge into the atmosphere from the Backup NCG Incinerator/scrubber system any gases which contain nitrogen oxide (NO_X) emissions in excess of the following:
 - a. 0.456 lb/ADTP from the Backup NCG Incinerators. [40 CFR 52.21 BACT Limit]
 - b. 100 tons NO_X per consecutive 12-month period. [40 CFR 52.21 BACT Limit]

3.3 Equipment Federal Rule Standards

No. 5 Lime Kiln (Source Code L537)

- 3.3.1 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 5 Lime Kiln any gases which contain emissions in excess of the following:
 - a. 0.15 g/dscm (0.064 gr/dscf) of filterable particulate matter (FPM) (corrected to 10% oxygen).
 [40 CFR 60.282(a)(3)(i) and 40 CFR 63.862(a)(1)(i)(C); 40 CFR 60.282(a)(3)(ii) subsumed]
 - b. 35.0 lbs/hr of FPM. [40 CFR 52.21 Avoidance]
 - c. Total reduced sulfur (TRS) in excess of 8 ppm on a dry basis (corrected to 10% oxygen) on a 12-hour basis.
 [40 CFR 60.283(a)(5)]

Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706, and U707)

3.3.2 All fuel oil burned in the Nos. 6 and 7 Power Boilers shall meet the definition of "very low sulfur oil" in 40 CFR 60.41b.
 [40 CFR 60.41b; 391-3-1-.02(2)(g)2 subsumed]

- 3.3.3 The Permittee shall not discharge, or cause the discharge, into the atmosphere from the Nos. 6 and 7 Power Boilers, any gases which exhibit greater than 20% opacity, except for one 6-minute period per hour of not more than 27% opacity, only when burning fuel oil. [40 CFR 60.43b(f) and 391-3-1-.02(2)(d)3]
- 3.3.4 The annual capacity factor for oil fired in the Nos. 6 and 7 Power Boilers must be 10% or less. The annual capacity factor is the ratio between the actual heat input to a steam generating unit from fuel oil during a calendar year and the potential heat input to the boiler had it been operated 8,760 hours during a calendar year at maximum steady state design heat input capacity. [40 CFR 60.41b, 40 CFR 60.42b(f), and 40 CFR 60.44b(c)]
- 3.3.5 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No. 7 Power Boiler, any gases which contain the following:
 - a. Filterable particulate matter (FPM) in excess of 0.1 lb/MMBtu while burning fuel oil. [40 CFR 60.43b(b); 391-3-1-.02(2)(d)2(ii) subsumed]
 - b. FPM in excess of 0.015 lb/MMBtu while burning natural gas. [40 CFR 52.21 Avoidance; 391-3-1-.02(2)(d)2(ii) subsumed]
 - c. Nitrogen oxides (NO_X) in excess of 0.1 lb/MMBtu while burning fuel oil. [40 CFR 60.44b(a)(1)(i) and 40 CFR 52.21 Avoidance]
 - d. NO_X in excess of 0.08 lb/MMBtu while burning natural gas. [40 CFR 52.21 Avoidance; 40 CFR 60. 44b(a)(1)(i) subsumed]
- 3.3.6 The Permittee shall not discharge, or cause the discharge, into the atmosphere, from the No. 6 Power Boiler, any gases which contain:
 - a. Nitrogen oxides (NO_X) in excess of:
 - i. 0.065 lb/MMBtu while burning natural gas. [40 CFR 52.21 Avoidance; 40 CFR 60. 44b(a)(1)(i) subsumed]
 - ii. 0.1 lb/MMBtu while burning No. 2 fuel oil.[40 CFR 60.44b(a)(1)(i)]
 - b. Carbon monoxide (CO) in excess of: [40 CFR 52.21 Avoidance]
 - i. 0.15 lb/MMBtu while burning fuel oil.
 - ii. 0.065 lb/MMBtu while burning natural gas.
 - c. Filterable particulate matter (FPM) in excess of 0.10 lb/MMBtu. [40 CFR 60.43b(b), 391-3-1-.02(2)(d)2(iii)]

3.3.7 The Permittee shall not discharge or cause the discharge into the atmosphere from the No. 4 Power Boiler any gases that contain mercury in excess of 7.1 pounds per 24-hour period while burning mill wastewater sludge.
 [40 CFR 61.52(b)]

40 CFR 63 Subpart S - "Cluster Rule"

- 3.3.8 The Permittee shall control the total hazardous air pollutant (HAP) emissions from the following equipment systems:
 [40 CFR 63.443(a)(1)(ii) through (v)]
 - a. Each knotter or screen system with total HAP mass emission rates as specified below:
 - i. Each knotter system with emissions of 0.05 kg or more of total HAP per megagram of ODP (oven dried pulp) (0.1 lb/ton).
 - ii. Each screen system with emissions of 0.10 kg or more of total HAP per megagram of ODP (0.2 lb/ton).
 - iii. Each knotter and screen system with emissions of 0.15 kg or more total HAP per megagram of ODP (0.3 lb/ton).
 - b. Each pulp washing system;
 - c. Each decker system that uses any process water other than freshwater or paper machine whitewater or any process water with a total HAP concentration greater than 400 ppm by weight; and
 - d. Each oxygen delignification system (Equipment Group Code: PG35).
- 3.3.9 The Permittee shall control the total HAP emissions from each component of the Low Volume High Concentration (LVHC) system (including Source Codes/Equipment Groups: R483, R484, RG10, PG25, R489, R490, PG31, PG01, and R495) using Nos. 5 or 6 Recovery Furnaces (Source Codes R401 or R407) or the Backup Incinerator/Scrubber System (Source Codes R480 and RIS1) by introducing the HAP emissions stream with the primary fuel or into the flame zone. The LVHC system is defined as the collection of equipment including the digester, turpentine recovery, evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed. [40 CFR 63.443(d)(3) and 40 CFR 60.283(a)(1)(iii)]

- 3.3.10 For the LVHC destruction as required by Condition 3.3.9 and the HVLC destruction required by Condition 3.3.8, periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of 40 CFR 63.443(c) and 63.443(d) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed the following levels: [40 CFR 63.443(e)]
 - a. 1% for control devices used to reduce the total HAP emissions from the LVHC system; and
 - b. 4% for control devices used to reduce the total HAP emissions from the HVLC system; and
 - c. 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.
- 3.3.11 Each bleaching system where chlorinated compounds are introduced shall be enclosed and vented into a closed-vent system and routed to its scrubber. The enclosure and closed-vent system shall meet the requirements specified in 40 CFR 63.450.
 [40 CFR 63.445(b)]
- 3.3.12 The scrubber used to reduce chlorinated HAP emissions (not including chloroform) from each bleaching stage where chlorinated compounds are introduced shall achieve a treatment device outlet concentration of 10 ppm or less by volume of total chlorinated HAP. [40 CFR 63.445(c)(2)]
- 3.3.13 The Permittee shall not use hypochlorite or chlorine for bleaching in the bleaching systems or lines.
 [40 CFR 63.445(d)(2)]
- 3.3.14 The Permittee shall treat the pulping process condensates from the following equipment systems to meet the requirements specified in Condition 3.3.9:[40 CFR 63.446(b)]
 - a. Each digester system;
 - b. Each turpentine recovery system;
 - c. Each evaporator system condensate from:
 - i. The vapors from each stage where weak liquor is introduced (feed stages); and
 - ii. Each evaporator vacuum system for each stage where weak liquor is introduced (feed stages).
 - d. Each HVLC (High Volume Low Concentration) collection system; and
 - e. Each LVHC collection system.

- 3.3.15 The Permittee shall collect the pulping process condensates from the applicable equipment systems listed in Condition 3.3.14 that in total contain a HAP mass of at least 11.1 lb/ton ODP.
 [40 CFR 63.446(c)(3)]
- 3.3.16 The selected pulping process condensates from the equipment systems listed in Condition3.3.14 shall be conveyed in a closed collection system that is designed and operated to meetthe following requirements:[40 CFR 63.446(d)]
 - a. Each closed collection system shall meet the individual drain system requirements specified in 40 CFR 63.960, 63.961 and 63.962 of Subpart RR, except the closed-vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.443(d) and 63.450, instead of 40 CFR 63.693; and
 - b. If a condensate tank is used, the condensate tank shall meet the following requirements:
 - i. The fixed roof and all openings shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm above background. The roof and openings shall be vented into a closed-vent system that meets the requirements of 40 CFR 63.450 and routed to a control device that meets the requirements of 40 CFR 63.443(d); and
 - ii. Each opening shall be maintained in a closed, sealed position at all times that the tank contains any pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance or repair.
- 3.3.17 The Permittee shall treat the pulping process condensates to reduce or destroy total HAPs by at least 10.2 lb/ton ODP and/or recycle the pulping process condensate to an equipment system specified in 63.443(a) that meets the requirements specified in 63.443(c) and (d). [40 CFR 63.446(e)(1) and (5)]
- 3.3.18 For each steam stripper system used to comply with the requirements specified in Condition 3.3.16, periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of 40 CFR 63.446(d), (e), and (f) providing that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed 10%. The steam stripper system consists of the No. 1 and No. 2 Strippers (Source Codes R441 and R500). [40 CFR 63.446(g)]
- 3.3.19 The Permittee shall evaluate all new or modified pulping process condensates or changes in the annual bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of this section.[40 CFR 63.446(h)]

3.3.20 The Permittee shall control the HAP emissions from each component of the HVLC system (including Equipment Group Source Codes PG35, PG34, PG33¹, PG32¹, and PG30) using the Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407). An HVLC system is defined as the collection of equipment including the pulp washing, knotter, screen, decker, and oxygen delignification systems, weak liquor storage tanks, and any other equipment serving the same function as those previously listed, as applicable by Condition 3.3.8. Upon completion of the modification as described in Application No. 607947, equipment PG32, PG33, and PG30 will be subjected to this condition and PG27 and PG28 will no longer be in service.
[40 CFR 63.443(a)(1)(ii) through (v), 40 CFR 63.443(a)(2), 40 CFR 63.443(d)(4), and 40

40 CFR 60 Subpart Kb - Storage Tanks

CFR 63.440(d)(1)]

3.3.21 The Permittee shall comply with 40 CFR 60 Subpart Kb "Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984" for the Methanol Storage Tank (Source Code B261).
 [40 CFR 60 Subpart Kb]

General Requirements

- 3.3.22 The Permittee shall comply with all applicable provisions of Federal Standard 40 CFR 60 Subpart A - "General Provisions."
 [40 CFR 60 Subpart A]
- 3.3.23 The Permittee shall comply with all applicable provisions of 40 CFR Part 60 Subpart Db "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units" for the No. 6 Recovery Furnace and the Nos. 6 and 7 Power Boilers (Source Codes R407, U706, and U707).
 [40 CFR 60 Subpart Db]
- 3.3.24 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart A "General Provisions" as specified in Table 1 to 40 CFR 63 Subpart S, Table 1 to 40 CFR 63 Subpart MM, Table 10 to 40 CFR 63 Subpart DDDDD, and as specified in Table 3 of 40 CFR 63 Subpart GGGGG.
 [40 CFR 63 Subparts S, MM, DDDDD, and GGGGG]
- 3.3.25 The Permittee shall comply with all applicable provisions of 40 CFR 63 Subpart S National Emission Standard for Hazardous Air Pollutants from the Pulp and Paper Industry."
 [40 CFR 63 Subpart S]

¹The new Knotters (PG32) and Screen (PG33) Systems are affected sources under 40 CFR 63 Subpart S; however, emissions from these sources are not required to be collected as they will be less than thresholds as stated in 40 CFR 63.443(a)(1)(ii)(A) and (iv)(B). Due to the design of the Brownstock Washer System, emissions will be voluntarily collected and routed through the Nos. 5 and 6 Recovery Furnaces (R401 and R407).

- 3.3.26 The Permittee shall comply with all applicable provisions of Federal Standard 40 CFR 63 Subpart MM - "National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills" for the Nos. 5 and 6 Recovery Furnaces, Nos. 5 and 6 Smelt Dissolving Tanks, and No. 5 Lime Kiln (Source Codes R401, R407, R403, R408, and L537). [40 CFR 63.863(a) and (c)]
- 3.3.27 The Permittee shall comply with all applicable provisions of 40 CFR 61 Subpart A -"General Provisions" for the No. 4 Power Boiler (Source Code U700) while combusting mill wastewater sludge. [40 CFR 61 Subpart A]
- 3.3.28 The Permittee shall comply with all applicable provisions of 40 CFR 61 Subpart E -"National Emission Standards for Hazardous Air Pollutants for Mercury" for the No. 4 Power Boiler (Source Code U700) while combusting mill wastewater sludge. [40 CFR 61 Subpart E]
- 3.3.29 The Permittee shall comply with all applicable provisions of 40 CFR Part 63 Subpart GGGGG - "National Emission Standards for Hazardous Air Pollutants: Site Remediation." [40 CFR 63 Subpart GGGGG]
- 3.3.30 The Permittee shall comply with all applicable provisions of 40 CFR Part 60 Subpart BB "Standards of Performance for Kraft Pulp Mills" for the No. 6 Recovery Furnace, No. 2 Recovery Furnace Concentrator, Nos. 1 and 2 Steam Strippers, Batch Digesters, Evaporator Group, Brownstock Washer Systems, and No. 5 Lime Kiln (Source Codes R407, R484, R408, R441, R500, RG10, PG30, and L537). PG30 will no longer be subject to this rule upon completion of the modification as described by Application No. 607947. [40 CFR 60 Subpart BB]

40 CFR 60 Subpart Db – No. 6 Recovery Furnace (Source Code R407)

3.3.31 The annual capacity factor for oil and gas fired in the No. 6 Recovery Furnace must be 10% or less. The annual capacity factor is the ratio between the actual heat input to a steam generating unit from fuel oil during a calendar year and the potential heat input to the boiler had it been operated 8,760 hours during a calendar year at maximum steady state design heat input capacity. [40 CFR 60.41b, 40 CFR 60.42b(f), and 40 CFR 60.44b(c)]

40 CFR 63 Subpart DDDDD – Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706, & U707)

3.3.32 The Permittee shall comply with all applicable provisions of the National Emission Standard for Hazardous Air Pollutants (NESHAP) as found in 40 CFR Part 63 in Subpart DDDDD - "Industrial, Commercial, and Institutional Boilers and Process Heaters" for the No. 4 Power Boiler (Source Code U700), No. 6 Power Boiler (Source Code U706), and No. 7 Power Boiler (Source Code U707). [40 CFR 63 Subpart DDDDD; 40 CFR 63.7500(a)(1)]

3.3.33 The Permittee shall conduct a tune-up every five years for each piece of equipment listed in Condition 3.3.32 as specified in §63.7540.[Table 3 of 40 CFR 63 Subpart DDDDD; 40 CFR 63.7540]

40 CFR 63 Subpart BBa – Brownstock Washer System (Source Codes PG30, PG32, PG33, & PG34)

- 3.3.34 The Permittee shall comply with all applicable provisions of 40 CFR Part 60 Subpart BBa "Standards of Performance for Kraft Pulp Mills Affected Source for Which Construction, Reconstruction, or Modification Commenced After May 23, 2013" for Brownstock Washer System, Knotters, and Filtrate Tanks (Source Codes PG30, PG32, and PG34). This Condition shall become applicable upon completion of the modification as described by Application No. 607947. [40 CFR 60 Subpart BBa]
- 3.3.35 The Permittee shall not discharge or cause the discharge into the atmosphere any gases from the Brownstock Washer System (Source Codes PG30, PG32, PG33², and PG34²) which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10-percent oxygen unless the gases are collected in an LVHC or HVLC closed-vent system meeting the requirements of 40 CFR 63.450 and combusted in Nos. 5 or 6 Recovery Furnace (Source Codes R401 and R407). This Permit Condition becomes effective upon startup of the units PG30, PG32, PG33, and PG34 as described in Application No. 607947. [40 CFR 60.283a(a)(1)(ii) and (iii)]
- 3.3.36 The Permittee shall ensure that the operation of the No. 5 Recovery Furnace (Source Code R401 allows that digester system, brown stock washer system, multiple-effect evaporator system, or condensate stripper system gases are subjected to a minimum temperature of 650°C (1200°F) for at least 0.5 second.
 [40 CFR 60.283(a)(1)(iii) and 40 CFR 60.283a(a)(1)(iii)]
- 3.3.37 In response to an action to enforce the standards set forth in 40 CFR 60 Subpart BBa, the Permittee may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by a malfunction, as defined in 40 CFR 60.2. Appropriate penalties may be assessed, however, if the Permittee fails to meet the burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief. This Condition shall become applicable upon completion of the modification as described by Application No. 607947. [40 CFR 60.286a]
 - a. To establish the affirmative defense in any action to enforce such a limit, the Permittee must timely meet the notification requirements of paragraph (b) of 40 CFR 60.286a and must prove by a preponderance of evidence that the following conditions were met.

²The new Screen Systems (PG33) and Foam Tanks (PG34) are not subject to 40 CFR 60 Subpart BBa. Due to the design of the Brownstock Washer System, emissions will be voluntarily collected and routed through the Nos. 5 and 6 Recovery Furnaces (R401 and R407).

- i. The violation:
 - A. Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, and
 - B. Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and
 - C. Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and
 - D. Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and
- ii. Repairs were made as expeditiously as possible when a violation occurred. Offshift and overtime labor were used, to the extent practicable to make these repairs; and
- iii. The frequency, amount and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and
- iv. If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
- v. All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment and human health; and
- vi. All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and
- vii. All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and
- viii. At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and
- ix. A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.

3.4 Equipment SIP Rule Standards

No. 5 Lime Kiln (Source Code L537)

- 3.4.1 The Permittee shall not burn fuel containing more than 3% sulfur, by weight, in the No. 5 Lime Kiln.
 [391-3-1-.02(2)(g)2]
- 3.4.2 The Permittee shall not cause, let, suffer, permit, or allow emissions from the No. 5 Lime Kiln, the opacity of which is equal to or greater than 40%.
 [391-3-1-.02(2)(b)1]
- 3.4.3 The Permittee shall not cause, let, suffer, permit, or allow the rate of emission from the No.
 5 Lime Kiln, filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equation:
 [391-3-1-.02(2)(e)1(i)]
 - $E = 55P^{0.11}$ 40; for process input weight rate over 30 tons per hour.

E = emission rate in pounds per hour

P =process input weight rate in tons per hour

Lime Storage Silos & Lime Handling Systems

- 3.4.4 The Permittee shall not cause, let, suffer, permit, or allow emissions from the:
 - East Lime Storage Silos (Source Code L540) the opacity of which is equal to or greater than 40%.
 [391-3-1-.02(2)(b)1]
 - West Lime Storage Silos (Source Codes L540 and L541) the opacity of which is equal to or greater than 40%.
 [391-3-1-.02(2)(b)1]
 - Lime Mud Filters (Source Code LG11) the opacity of which is equal to or greater than 40%.
 [391-3-1-.02(2)(b)1]

The Permittee shall take corrective action for any abnormal visible dust emissions from this equipment within 12 hours of discovery.

3.4.5 The Permittee shall not cause, let, suffer, permit, or allow the rate of emission from each of the Lime Storage Silos (Source Codes L540 and L541), filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equation:

[391-3-1-.02(2)(e)1(i)]

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

E = emission rate in pounds per hour

P =process input weight rate in tons per hour

No. 4 Power Boiler (Source Code U700)

- 3.4.6 The Permittee shall not cause, let, suffer, permit, or allow emissions from the No. 4 Power Boiler the opacity of which is equal to or greater than 40%. [391-3-1-.02(2)(b)1]
- 3.4.7 The Permittee shall not cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from the No. 4 Power Boiler in amounts equal to or exceeding the following: [391-3-1-.02(2)(d)1(ii)]

 $P=0.7(10/R)^{0.202}$ pounds per million BTU heat input

Where:

P = the allowable weight of emissions of fly ash and/or filterable particulate matter in pounds per million BTU heat input

R = heat input of fuel-burning equipment in million BTU per hour.

3.4.8 The Permittee shall not burn fuel containing more than 3% sulfur, by weight, in the No. 4 Power Boiler. [391-3-1-.02(2)(g)2]

Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407)

3.4.9 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from the Nos. 5 and 6 Recovery Furnaces, filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equation: [391-3-1-.02(2)(e)1(i)]

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

 $E = 55P^{0.11}$ - 40; for process input weight rate over 30 tons per hour.

E = emission rate in pounds per hour

P =process input weight rate in tons per hour

- 3.4.10 The Permittee shall not cause, let, suffer, permit, or allow emissions from the No. 5 Recovery Furnace the opacity of which is equal to or greater than 40% when not firing Black Liquor Solids. [391-3-1-.02(2)(b)1]
- 3.4.11 The Permittee shall not burn fuel containing more than 3% sulfur, by weight, in the No. 5 Recovery Furnace. Black liquor is not considered a fuel by the Division.
 [391-3-1-.02(2)(g)2]
- 3.4.12 The Permittee may burn tall oil mixed with black liquor in the Nos. 5 and 6 Recovery Furnaces. [391-3-1-.03(2)(c)]

Nos. 5 and 6 Smelt Dissolving Tanks (Source Codes R403 and R408)

- 3.4.13 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from the Nos. 5 and 6 Smelt Dissolving Tanks, filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equation: [391-3-1-.02(2)(e)1(i)]
 - $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.
 - $E = 55P^{0.11}$ 40; for process input weight rate over 30 tons per hour.
 - E = emission rate in pounds per hour
 - P = process input weight rate in tons per hour
- 3.4.14 The Permittee shall not cause, let, suffer, permit, or allow emissions from the Nos. 5 and 6 Smelt Dissolving Tanks, the opacity of which is equal to or greater than 40%.
 [391-3-1-.02(2)(b)1]

Digesters/Evaporators (Equipment Group Codes RG10 and PG01)

3.4.15 The Permittee shall not cause, let, suffer, permit, or allow the emissions of TRS from any part of the Digester System or the Multiple Effect Evaporator System unless the gases are combusted in the Nos. 5 and 6 Recovery Furnaces or Backup NCG Incinerator (Source Code R480). [391-3-1-.02(2)(gg)2(ii)]

Slakers (Equipment Group Code LG09)

3.4.16 The Permittee shall not cause, let, suffer, permit, or allow emissions from any air contaminant source that is part of the Slakers the opacity of which is equal to or greater than 40%.[391-3-1-.02(2)(b)1]

3.4.17 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any air contaminant source that is part of the Slakers, filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equations:

[391-3-1-.02(2)(e)1(i)]

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

E = emission rate in pounds per hour

P =process input weight rate in tons per hour

Bark Transfer System Cyclone (Source Code U703)

- 3.4.18 The Permittee shall not cause, let, suffer, permit, or allow emissions from the Bark Transfer Cyclone the opacity of which is equal to or greater than 40%. [391-3-1-.02(2)(b)1]
- 3.4.19 The Permittee shall not cause, let, permit, suffer, or allow the rate of emission from the Bark Transfer Cyclone, filterable particulate matter (FPM) in total quantities equal to or exceeding the allowable rates calculated using the following equation: [391-3-1-.02(2)(e)1(i)]

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour.

 $E = 55P^{0.11}$ - 40; for process input weight rate over 30 tons per hour.

E = emission rate in pounds per hour

P =process input weight rate in tons per hour

Woodyard (Equipment Group WY01)

- 3.4.20 The Permittee shall take all reasonable precautions to prevent dust from the Woodyard Area from becoming airborne. Reasonable precautions that should be taken to prevent dust from becoming airborne include, but are not limited to, the following: [391-3-1-.02(2)(n)1]
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;

- d. Covering, at all times when in motion, open bodied trucks, transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 3.4.21 The Permittee shall not cause, let, suffer, permit, or allow emissions from the Woodyard Area the opacity of which is equal to or greater than 20%. [391-3-1-.02(2)(n)2]

Backup NCG Incinerator/Scrubber System (Source Codes R480 and RIS1)

- 3.4.22 The Permittee shall operate the Backup NCG Incinerator Scrubber at all times when operating the Backup NCG Incinerator, except during periods when no NCGs are being burned or when the incinerator is only burning natural gas. [391-3-1-.02(2)(a)10]
- 3.4.23 The Permittee shall use the Backup NCG Incinerator as a backup control device for the Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407).
 [391-3-1-.02(2)(a)10]
- 3.4.24 The Permittee shall maintain a minimum temperature of 1200°F for a retention time of at least 0.5 seconds in the Backup NCG Incinerator.
 [391-3-1-.02(2)(gg)1(ii)(III) and 40 CFR 60.283(a)(1)(iii)]
- 3.4.25 The Permittee shall not cause, let, suffer, permit, or allow emissions from the Backup NCG Incinerator the opacity of which is equal to or greater than 40%. [391-3-1-.02(2)(b)1]

3.5 Equipment Standards Not Covered by a Federal or SIP Rule and Not Instituted as an Emission Cap or Operating Limit

3.5.1 The Permittee shall utilize the defoamer additive system as a final contingency to manage foam on the Aerated Stabilization Basin (Source Code O900) should there be a significant potential for airborne foam on the Aerated Stabilization Basin. In addition, the Permittee shall utilize the defoamer additive system until the surface condition of the Aerated Stabilization Basin returns to normal. [391-3-1-.02(2)(a)10]

PART 4.0 REQUIREMENTS FOR TESTING

4.1 General Testing Requirements

- 4.1.1 The Permittee shall cause to be conducted a performance test at any specified emission unit when so directed by the Environmental Protection Division ("Division"). The test results shall be submitted to the Division within 60 days of the completion of the testing. Any tests shall be performed and conducted using methods and procedures that have been previously specified or approved by the Division. [391-3-1-.02(6)(b)1(i)]
- 4.1.2 The Permittee shall provide the Division thirty (30) days (or sixty (60) days for tests required by 40 CFR Part 63) prior written notice of the date of any performance test(s) to afford the Division the opportunity to witness and/or audit the test and shall provide with the notification a test plan in accordance with Division guidelines. [391-3-1-.02(3)(a) and 40 CFR 63.7(b)(1)]
- 4.1.3 Performance and compliance tests shall be conducted and data reduced in accordance with applicable procedures and methods specified in the Division's Procedures for Testing and Monitoring Sources of Air Pollutants. The methods for the determination of compliance with emission limits listed under Sections 3.2, 3.3, 3.4 and 3.5 are as follows:
 - a. Method 1 for sample point location.
 - b. Method 2 for the determination of flow rate.
 - c. Method 3 for the determination of stack gas molecular weight.
 - d. Method 4 for the determination of stack gas moisture.
 - e. Method 5 and 5B or Method 17, as applicable, for the determination of filterable particulate matter.
 - f. Method 6 or 6C for determination of the concentration of sulfur dioxide, the sampling time shall be three one-hour runs for both Method 6 and 6c.
 - g. Method 7 or 7E for the determination of the concentration of nitrogen oxides, for condition 3.2.9 the procedures under section 2.12(b)(4)(i) of the above referenced document shall apply.
 - h. Method 9 and the Procedures of Section 1.3 for the determination of the opacity of visual emissions.
 - i. Method 10 for the determination of carbon monoxide emissions.
 - j. Method 16 for the determination of the concentration of total reduced sulfur.
 - k. Method 21 for the determination of volatile organic compound leaks.

- 1. Method 25 or Method 25A for the determination of total Gaseous Nonmethane Organic Emissions as Carbon.
- m. Method 305 or NCASI Method DI/MEOH, Methanol in Process Liquids GC/FID (Gas Chromatography/Flame Ionization) for the determination of methanol content.
- n. Method 101A or Method 105 for the determination of mercury emissions.
- o. Method 201 or 201A for the measurement of filterable PM_{10} emissions.
- p. Method 308, Method 320, or Method 18 for the determination of methanol emissions from stationary sources.
- q. The procedures described in U.S. Environmental Protection Agency document EPA-600/2-80-018 (Samplers and Sampling Procedures for Hazardous Waste Streams) shall be used to obtain the sample of used oil as necessary.
- r. Method 6010B, contained in the SW-846 methods manual of U.S. Environmental Protection Agency's Office of Solid Waste, shall be used to determine concentrations of arsenic, cadmium, chromium, and lead.
- s. ASTM D808 shall be used to determine total halogens.
- t. ASTM D 93 shall be used to determine flash point.
- u. SW-846 Method 8082 shall be used to determine Polychlorinated biphenyls (PCB).
- v. National Council of the Paper Industry for Air and Stream Improvement, Inc. (NCASI) Method 520: "Quality Assurance and Measurement of Chloroform, Chlorine and Chlorine Dioxide release from Bleach Plants," September 1990.
- w. Method 5 in conjunction with Method 202 or OTM 28 (if applicable) for the determination of particulate matter emissions from sources with wet control devices, or Method 201 or 201A in conjunction with Method 202 or OTM 28 (if applicable) for the determination of particulate matter emissions from sources with dry control devices.

40 CFR 63 Subpart MM Test Methods

- x. Method 1 or 1A for selection of sampling port location and number of traverse points. [40 CFR 63.865(b)(5)(i)]
- Method 2, 2A, 2C, 2D, 2F, or 2G for determining stack gas velocity and volumetric flow rate.
 [40 CFR 63.865(b)(5)(ii)]

- z. Method 3A or 3B for determining the oxygen concentration. The gas sample must be taken at the same time and at the same traverse points as the particulate sample. The voluntary consensus standard ANSI/ASME PTC 19.10-1981 Part 10 may be used as an alternative to using Method 3B. [40 CFR 63.865(b)(3)]
- aa. Method 3, 3A, or 3B for conducting gas analysis. The voluntary consensus standard ANSI/ASME PTC 19.10-1981 Part 10 may be used as an alternative to using Method 3B.
 [40 CFR 63.865(b)(5)(iii)]
- bb. Method 4 for determining moisture content of stack gas. [40 CFR 63.865(b)(5)(iv)]
- cc. Method 5 or 29 for determining the concentration or mass of filterable particulate matter emitted. Method 17 may be used in lieu of Method 5 or Method 29 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than 205°C (400°F). For Methods 5, 29, and 17, the sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf) and the water must be used as the cleanup solvent instead of acetone in the sample recovery procedure. [40 CFR 63.865(b)(1)]
- dd. For the Nos. 5 and 6 Recovery Furnaces and No. 5 Lime Kiln (Source Code R401, R407, and L537), the particulate matter concentration must be corrected to the appropriate oxygen concentration using the procedures of 40 CFR 63.865(b)(2). [40 CFR 63.865(b)(2)]

Minor changes in methodology may be specified or approved by the Director or his designee when necessitated by process variables, changes in facility design, or improvement or corrections that, in his opinion, render those methods or procedures, or portions thereof, more reliable. [391-3-1-.02(3)(a)]

4.1.4 The Permittee shall submit performance test results to the US EPA's Central Data Exchange (CDX) using the Compliance and Emissions Data Reporting Interface (CEDRI) in accordance with any applicable NSPS or NESHAP standards (40 CFR 60 or 40 CFR 63) that contain Electronic Data Reporting Requirements. This Condition is only applicable if required by an applicable standard and for the pollutant(s) subject to said standard. [391-3-1-.02(8)(a) and 391-3-1-.02(9)(a)]

4.2 Specific Testing Requirements

4.2.1 The Permittee shall conduct performance tests for the following specified equipment and pollutants: [391-3-1-.02(2)(a)]

| Source Code | Equipment | Pollutants |
|-------------|-----------------------------|-----------------------------------|
| L537 | No. 5 Lime Kiln | FPM |
| U700 | No. 4 Power Boiler | FPM |
| R401 | No. 5 Recovery Furnace | FPM, VOC |
| R407 | No. 6 Recovery Furnace | FPM, SO ₂ , VOC |
| R403 | No. 5 Smelt Dissolving Tank | TRS, FPM |
| R408 | No. 6 Smelt Dissolving Tank | FPM, TRS, SO ₂ |
| R480 | Backup NCG Incinerator | SO ₂ , NO _X |

4.2.2 The Permittee shall conduct performance tests as specified by the following table and criteria unless otherwise specified by the Division:[391-3-1-.02(2)(a)10]

| Equipment | Testing Frequency |
|-----------------------------|---|
| No. 5 Lime Kiln | FPM – annually |
| No. 4 Power Boiler | FPM – annually |
| No. 5 Recovery Furnace | FPM, VOC – biennially |
| No. 6 Recovery Furnace | FPM, SO ₂ , VOC – biennially |
| No. 5 Smelt Dissolving Tank | FPM, TRS – biennially |
| No. 6 Smelt Dissolving Tank | SO ₂ , FPM, TRS – biennially |
| Backup NCG Incinerator | SO_2 , NO_X – annually |

- a. Where the results of a performance test which is required semi-annually or annually are less than or equal to 50% of the allowable limit, the Permittee may skip the next scheduled performance test;
- b. Where the results of a performance test which is required annually are greater than 85% of the allowable limit, the Permittee shall begin testing on a semiannual basis with the next performance test due approximately six months following that test. If any subsequent test is less than or equal to 85% of the allowable limit, the Permittee shall resume annual testing. The provisions of 4.2.2.a do not apply until the results of two consecutive tests are less than or equal to 85% of the allowable.
- c. Where the results of a performance test which is required biennially are greater than 85% of the allowable limit, the Permittee shall begin testing on an annual basis with the next performance test due approximately twelve months following that test. If any subsequent test is less than or equal to 85% of the allowable limit, the Permittee shall resume biennial testing.
- d. Where required by Condition 6.1.7.c, data from these tests shall be used to establish the operational parameters. Data from a previously approved performance test which demonstrated compliance with the applicable emission limit may be used to establish the operational parameters in lieu of the most recent performance tests as long as that previous performance test is representative of current operations of the emission unit and was conducted during the 5 years prior to the most recent performance test or the life of this permit, whichever is shorter.
- e. The Permittee shall submit a list of all the current operational parameters established in accordance with this condition for the purpose of reporting under Condition 6.1.7.c with the quarterly report required by Condition 6.1.4.

40 CFR 63 Subpart MM Testing Requirements

- 4.2.3 In lieu of the initial performance test required by 40 CFR 63.865, the Permittee shall base operating ranges for the monitoring parameters in Conditions 5.2.2.d through 5.2.2.f, 5.2.3.a, and 5.2.3.d as appropriate on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required by 40 CFR 63.865. The Permittee must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained. [40 CFR 63.864(j)(2)]
- 4.2.4 The Permittee may establish expanded or replacement operating ranges for the monitoring parameters values listed in Conditions 5.2.2.d through 5.2.2.f, 5.2.3.a, and 5.2.3.d during subsequent performance tests using the test methods listed in 40 CFR 63.865. [40 CFR 63.864(j)(3)]
- 4.2.5 The Permittee shall continuously monitor each parameter as outlined in Conditions 5.2.2.d through 5.2.2.f and determine the arithmetic average value of each parameter during each performance test. Multiple performance tests may be conducted to establish a range of parameter values. Operating outside a previously established parameter limit during a performance test to expand the operating range does not constitute a monitoring exceedance. Operating limits must be confirmed or reestablished during performance tests. [40 CFR 63.864(j)(4)]
- 4.2.6 Process data measured during the performance test must be used to determine the black liquor solids firing rate on a dry basis and the calcium oxide (CaO) production rate. [40 CFR 63.865(b)(6)]

New/Modified Equipment Performance Testing

4.2.7 The Permittee shall conduct a performance test to determine compliance with the requirements of Condition 3.2.16 and to establish a fan amperage for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) to be reported as exceedances or excursions in Conditions 6.1.7.b.v(F), 6.1.7.b.v(G), or 6.1.7.c.ii(A). Any testing conducted for the establishment of parameters for 40 CFR 63 Subpart MM must meet the requirements of Conditions 4.2.3 through 4.2.6 and Conditions 6.2.20 through 6.2.25. [40 CFR 63.865 and 391-3-1-.02(6)(b)1]

PART 5.0 REQUIREMENTS FOR MONITORING (Related to Data Collection)

5.1 General Monitoring Requirements

5.1.1 Any continuous monitoring system required by the Division and installed by the Permittee shall be in continuous operation and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Monitoring system response, relating only to calibration checks and zero and span adjustments, shall be measured and recorded during such periods. Maintenance or repair shall be conducted in the most expedient manner to minimize the period during which the system is out of service. [391-3-1-.02(6)(b)1]

5.2 Specific Monitoring Requirements

- 5.2.1 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated pollutants on the following equipment. Each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
 - a. TRS and oxygen from the No. 5 Lime Kiln (Source Code L537).
 - b. NO_X from the Nos. 6 and 7 Power Boilers (Source Codes U706 & U707).
 - c. No. 6 Recovery Furnace (Source Code R407).
 - i. TRS and oxygen. [40 CFR 60.284(a)(2) and 40 CFR 60.284a(a)(2)]
 - ii. NO_X and CO. [40 CFR 52.21 BACT]
 - d. Opacity from the Nos. 5 and 6 Recovery Furnaces and Nos. 4 and 6 Power Boilers (Source Codes R401, R407, U700 and U706). The continuous opacity monitoring system (COMS) must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. The COMS data must be reduced as specified in 40 CFR 63.8(g)(2).
 [391-3-1-.02(6)(b)1, 40 CFR 70.6(a)(3)(i), 40 CFR 60.48b(a), 40 CFR 60.248(a)(1), and 40 CFR 63.864(d)]
 - e. TRS and oxygen from the No. 5 Recovery Furnace (Source Code R401). [40 CFR 60.284(a)(2) and 40 CFR 60.284a(a)(2)]
 - f. NO_X and CO from the No. 4 Power Boiler (Source Code U700). [40 CFR 52.21 Avoidance]

- 5.2.2 The Permittee shall install, calibrate, maintain, and operate a system to continuously monitor and record the indicated parameters on the following equipment. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
 - a. Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706, and U707)
 - i. No. 2 fuel oil flow to the No. 7 Power Boiler
 - ii. No. 2 fuel oil flow to the No. 6 Power Boiler
 - iii. No. 6 fuel oil flow to the No. 4 Power Boiler
 - iv. Bark feed rate to the No. 4 Power Boiler
 - v. Tire Derived Fuel (TDF) feed rate to the No. 4 Power Boiler
 - vi. Natural gas flow rate to the No. 4 Power Boiler
 - vii. Natural gas flow rate to the No. 6 Power Boiler

viii. Natural gas flow rate to the No. 7 Power Boiler

- b. No. 5 Lime Kiln Scrubber (Source Code LKS1) and No. 5 Lime Kiln Electrostatic Precipitator (Source Code LEP1)
 - Scrubbant Recirculation Rate (Flow rate) for the No. 5 Lime Kiln Scrubber at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c). The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ±5 percent of the design scrubbing liquid flow rate.
 [40 CFR 60 Subpart BBa alternative monitoring plan, 40 CFR 63.864(e)(10)]
 - ii. Scrubbant Supply Pressure for the No. 5 Lime Kiln Scrubber at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c). The monitoring device used for the continuous measurement of the scrubbant supply pressure must be certified by the manufacturer to be accurate to within a gage pressure of \pm 500 pascals (\pm 2 inches of water gage pressure). [40 CFR 60.284(b)(2)(ii) and 40 CFR 63.864(e)(13)]
 - iii. Secondary current and secondary voltage for each electrical isolatable section (bus section) of the electrostatic precipitator for No. 5 Lime Kiln to determine total secondary power at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c).
 [40 CFR 63.864(e)(14)]

- c. Nos. 5 and 6 Smelt Dissolving Tanks Scrubbers (Source Codes RSS5 and RSS6)
 - i. Pressure drop across the No. 5 Smelt Dissolving Tank Scrubber at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c). The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate to within a gage pressure of ± 500 pascals (± 2 inches of water gage pressure). [40 CFR 63.864(e)(10)]
 - ii. Scrubbant Flow Rate for the Nos. 5 and 6 Smelt Dissolving Tank Scrubbers at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c). The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within ± 5 percent of the design scrubbing liquid flow rate. [40 CFR 63.864(e)(10)]
 - iii. Until the Fan Amperage value is determined in accordance with Condition 4.2.7 for the No. 6 Smelt Dissolving Tank Scrubber, Scrubbant Supply Pressure for the No. 6 Smelt Dissolving Tank Scrubber at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c). The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate to within a gage pressure of ±500 pascals (±2 inches of water gage pressure). [Subpart MM Alternative Monitoring Request, 2004]
 - iv. After the Fan Amperage value is determined in accordance with Condition 4.2.7 for the No. 6 Smelt Dissolving Tank Scrubber, Fan Amperage for the No. 6 Smelt Dissolving Tank Scrubber at least once every successive 15-minute period using the procedures in 40 CFR 63.8(c).
 [40 CFR 63.864(e)(10)(iii), 40 CFR 63.864(e)(13)]
 - v. Weak Wash Makeup Flow Rate to the No. 5 Smelt Dissolving Tank Scrubber.
- d. No. 1 Steam Stripper (Source Code R441)
 - i. Process Wastewater Feed Rate for the No. 1 Steam Stripper.
 - ii. Steam Feed Rate for the No. 1 Steam Stripper.
 - iii. Process Wastewater Column Feed Temperature for the No. 1 Steam Stripper.
 - iv. Total steam-to-condensate ratio shall be determined and recorded from the Wastewater Feed Rate and Steam Feed Rate to the No. 1 Steam Stripper.

- e. No. 2 Steam Stripper (Source Code R500)
 - i. Process Wastewater Feed Rate for the No. 2 Steam Stripper.
 - ii. Steam Feed Rate for the No. 2 Steam Stripper.
 - iii. Process Wastewater Column Feed Temperature for the No. 2 Steam Stripper.
 - iv. Total steam-to-condensate ratio shall be determined and recorded from the Wastewater Feed Rate and Steam Feed Rate to the No. 2 Steam Stripper.
- f. Backup NCG Incinerator/Scrubber System (Source Codes R480 and RIS1)
 - i. Temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs in the Backup NCG Incinerator when combusting NCG gases.
 - ii. pH of scrubbant for the Backup NCG Incinerator Scrubber.
 - iii. Scrubbant Recirculation Rate for the Backup NCG Incinerator Scrubber
- 5.2.3 The Permittee shall install, calibrate, maintain, and operate monitoring devices for the measurement of the indicated parameters on the following equipment. Data shall be recorded at the frequency specified below. Where such performance specification(s) exist, each system shall meet the applicable performance specification(s) of the Division's monitoring requirements.

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

- a. No. 5 Lime Kiln (Source Code L537)
 - Calcium oxide (CaO) production rate in tons/day or Mg/day from the No. 5 Lime Kiln. Data shall be recorded daily. [40 CFR 63.866(c)(2)]
- b. Lime Silos Baghouses (Source Codes LBH1 and LBH2)
 - i. Pressure drop across the West Lime Storage Silo Baghouse LBH2. Data shall be recorded once per 8 hours of operation.
 - ii. Pressure drop across the East Lime Storage Silo Baghouse LBH1. Data shall be recorded once per 8 hours of operation.
- c. Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407)
 - Black Liquor Solids firing rates for the No. 5 Recovery Furnace. Black liquor firing rate shall be in units of tons/day or Mg/day. Data shall be recorded once per day of furnace operation. [40 CFR 63.866(c)(1)]

- Black Liquor Solids firing rates for the No. 6 Recovery Furnace. Black liquor firing rate shall be in units of tons/day or Mg/day. Data shall be recorded once per day of furnace operation.
 [40 CFR 63.866(c)(1)]
- iii. Fuel oil usage in the No. 5 Recovery Furnace. Data shall be recorded monthly.
- iv. Natural gas and No. 2 Fuel oil usage in the No. 6 Recovery Furnace. Data shall be recorded monthly.
- d. Bleach Plant Scrubber (Source Code BPS4)
 - i. Any 3-hour rolling average in which the liquid-to-air ratio for the No. 4 Bleach Plant Scrubber is less than 0.032 gal/scfm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 - ii. Any 3-hour rolling average in which the oxidation/reduction potential of the recirculation flow for the No. 4 Bleach Plant Scrubber is greater than -86 μohms, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 - iii. Scrubbant temperature for the SVP-LITE Tail Gas Scrubber. Data shall be recorded once per hour.
 - iv. Scrubbant flow rate for the SVP-LITE Tail Gas Scrubber. Data shall be recorded once per hour.
- e. No. 4 Power Boiler (Source Code U700)
 - i. Wastewater sludge combusted in the No. 4 Power Boiler. Data shall be recorded once per 24-hours of operation.

Cluster Rule

- 5.2.4 The Permittee shall ensure that each enclosure and closed vent system used to comply with Conditions 3.3.8, 3.3.9, and 3.3.16 complies with the following: [40 CFR 63.453(k)]
 - a. For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b) shall be performed at least once per month, with at least 14 days elapsed time between inspections, to ensure the opening is maintained in the closed position and sealed.

- b. Each closed-vent system required by 40 CFR 63.450(a) shall be visually inspected at least once per month, with at least 14 days elapsed time between inspections, and at other times as requested by the Division. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
- c. For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR 63.450(c) measured initially and annually by the procedures in 40 CFR 63.457(d).
- d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).
- e. The valve or closure mechanism specified in 40 CFR 63.450(d)(2) shall be inspected at least once per month, with at least 14 days elapsed time between inspections, to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.
- f. If an inspection required by Condition 5.2.5 identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 ppm by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.
 - i. A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
 - ii. The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the Permittee determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.
- 5.2.5 The Permittee shall visually inspect each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d) at a minimum of once per month, with at least 14 days elapsed time between inspections, and shall comply with the inspection requirements specified in 40 CFR 63.964, except for the closed-vent system and control device inspection and monitoring requirements specified in 40 CFR 63.964(a)(2) located in unsafe areas. The closed-vent system and control device shall meet the requirements specified in 40 CFR 63.453(a) and (k). [40 CFR 63.453(l)]

5.2.6 The Permittee shall operate the continuous monitoring system associated with the condensate collection and treatment to measure the appropriate parameters determined according to the procedures specified in 40 CFR 63.453(n) to comply with the condensate applicability requirements specified in 40 CFR 63.446(c). [40 CFR 63.453(i)]

Bark Transfer System

- 5.2.7 The Permittee shall visually observe the opacity from the Bark Transfer Cyclone (Source Code U703) once during the daylight shift for each day or portion of each day of operation of the bark transfer system. The Permittee shall record any visible abnormal bark dust emissions from the cyclone and note the corrective action taken. A checklist or similar log may be used for this purpose.
 [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 5.2.8 The Permittee shall visually inspect the exterior of the Bark Transfer Cyclone (Source Code U703) once per day for holes in the body or evidence of malfunction for each day or portion of each day of operation of the bark transfer system. The Permittee shall record any adverse condition discovered by the visual inspection and note the corrective action taken. A checklist or similar log may be used for this purpose. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

Compliance Assurance Monitoring

5.2.9 The following pollutant specific emission unit(s) (PSEU) are subject to the Compliance Assurance Monitoring (CAM) Rule in 40 CFR 64.

| Emission Unit | Pollutant |
|---|-----------------|
| Backup NCG Incinerator (Source Code R480) | SO ₂ |

Permit conditions in this permit for the PSEU(s) listed above with regulatory citation 40 CFR 70.6(a)(3)(i) are included for the purpose of complying with 40 CFR 64. In addition, the Permittee shall meet the requirements, as applicable, of 40 CFR 64.7, 64.8, and 64.9. [40 CFR 64]

5.2.10 The Permittee shall comply with the performance criteria listed in the table below for the sulfur dioxide (SO₂) emissions from the Backup NCG Incinerator (Source Code R480). [40 CFR 64.6(c)(1)(iii)]

| Performance Criteria [64.4(a)(3)] | Indicator No. 1 Scrubbant pH | Indicator No. 2 Scrubbant Recirculation Flow Rate |
|--|--|--|
| A. Data Representativeness [64.3(b)(1)] | Place the pH sensor in a position that provides a representative measurement of scrubber effluent pH. Ensure the sample is properly mixed and representative of fluid being measured. | <u>+</u> 5 percent of the design scrubbant liquid flow rate. |
| B. Verification of Operational Status (new/modified monitoring equipment only) [64.3(b)(2)] | N/A | N/A |
| C. QA/QC Practices and Criteria [64.3(b)(3)] | The pH meter calibration is checked weekly. | The Permittee is subject to the calibration, maintenance, and operation of the continuous monitoring system. |
| D. Monitoring Frequency [64.3(b)(4)] | Continuously (minimum of once per every 15 minutes) | Continuously (minimum of once per every 15 minutes) |
| Data Collection Procedures [64.3(b)(4)] | Continuous Monitoring System (CMS) to record pH every 15 minutes | Continuous Monitoring System (CMS) to record flow rate every 15 minutes |
| Averaging Period [64.3(b)(4)] | 3-hour rolling average | 3-hour rolling average |

PART 6.0 RECORD KEEPING AND REPORTING REQUIREMENTS

6.1 General Record Keeping and Reporting Requirements

- 6.1.1 Unless otherwise specified, all records required to be maintained by this Permit shall be recorded in a permanent form suitable for inspection and submission to the Division and to the EPA. The records shall be retained for at least five (5) years following the date of entry.
 [391-3-1-.02(6)(b)1(i) and 40 CFR 70.6(a)(3)]
- 6.1.2 In addition to any other reporting requirements of this Permit, the Permittee shall report to the Division in writing, within seven (7) days, any deviations from applicable requirements associated with any malfunction or breakdown of process, fuel burning, or emissions control equipment for a period of four hours or more which results in excessive emissions.

The Permittee shall submit a written report that shall contain the probable cause of the deviation(s), duration of the deviation(s), and any corrective actions or preventive measures taken.

[391-3-1-.02(6)(b)1(iv), 391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.3 The Permittee shall submit written reports of any failure to meet an applicable emission limitation or standard contained in this permit and/or any failure to comply with or complete a work practice standard or requirement contained in this permit which are not otherwise reported in accordance with Conditions 6.1.4 or 6.1.2. Such failures shall be determined through observation, data from any monitoring protocol, or by any other monitoring which is required by this permit. The reports shall cover each semiannual period ending June 30 and December 31 of each year, shall be postmarked by August 29 and February 28, respectively following each reporting period, and shall contain the probable cause of the failure(s), duration of the failure(s), and any corrective actions or preventive measures taken.

[391-3-1-.03(10)(d)1.(i) and 40 CFR 70.6(a)(3)(iii)(B)]

6.1.4 The Permittee shall submit a written report containing any excess emissions, exceedances, and/or excursions as described in this permit and any monitor malfunctions for each quarterly period ending March 31, June 30, September 30, and December 31 of each year. All reports shall be postmarked by May 30, August 29, November 29, and February 28, respectively following each reporting period. In the event that there have not been any excess emissions, exceedances, excursions or malfunctions during a reporting period, the report should so state. Otherwise, the contents of each report shall be as specified by the Division's Procedures for Testing and Monitoring Sources of Air Pollutants and shall contain the following:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)(A)]

- a. A summary report of excess emissions, exceedances and excursions, and monitor downtime, in accordance with Section 1.5(c) and (d) of the above referenced document, including any failure to follow required work practice procedures.
- b. Total process operating time during each reporting period.

- c. The magnitude of all excess emissions, exceedances and excursions computed in accordance with the applicable definitions as determined by the Director, and any conversion factors used, and the date and time of the commencement and completion of each time period of occurrence.
- d. Specific identification of each period of such excess emissions, exceedances, and excursions that occur during startups, shutdowns, or malfunctions of the affected facility. Include the nature and cause of any malfunction (if known), the corrective action taken or preventive measures adopted.
- e. The date and time identifying each period during which any required monitoring system or device was inoperative (including periods of malfunction) except for zero and span checks, and the nature of the repairs, adjustments, or replacement. When the monitoring system or device has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- f. Certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- 6.1.5 Where applicable, the Permittee shall keep the following records: [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(3)(ii)(A)]
 - a. The date, place, and time of sampling or measurement;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;
 - e. The results of such analyses; and
 - f. The operating conditions as existing at the time of sampling or measurement.
- 6.1.6 The Permittee shall maintain files of all required measurements, including continuous monitoring systems, monitoring devices, and performance testing measurements; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. These files shall be kept in a permanent form suitable for inspection and shall be maintained for a period of at least five (5) years following the date of such measurements, reports, maintenance and records. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6 (a)(3)(ii)(B)]

6.1.7 For the purpose of reporting excess emissions, exceedances or excursions in the report required in Condition 6.1.4, the following excess emissions, exceedances, and excursions shall be reported:

[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(iii)]

- Excess emissions: (means for the purpose of this Condition and Condition 6.1.4, any a. condition that is detected by monitoring or record keeping which is specifically defined, or stated to be, excess emissions by an applicable requirement)
 - Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407) i.
 - TRS Emissions from the No. 5 Recovery Boiler: (A)
 - **(I)** Any 24-hour average greater than 20 ppm TRS on a dry basis, corrected to 8% oxygen.
 - (II) Any 12-hour average greater than 10 ppm TRS on a dry basis, corrected to 8% oxygen, after the modifications to the No. 5 Recovery Furnace as described by Application No. 16576 dated January 18, 2006. [40 CFR 52.21 BACT]
 - **(B)** Any 12-hour average greater than 5 ppm TRS on a dry basis, corrected to 8% oxygen by volume from the No. 6 Recovery Furnace. [40 CFR 60.284(d)(1)(i) and 40 CFR 60.284a(d)(1)(i)]
 - (C) Any 6-minute period for which the opacity from the No. 5 Recovery Furnace is greater than 40%.
 - (D) Any 6-minute period for which the opacity from the No. 6 Recovery Furnace is greater than 35%. [40 CFR 60.284(d)(1)(ii)]
 - (E) Any 12-hour average greater than 100 ppm NO_X by volume corrected to 8% oxygen for No. 6 Recovery Furnace. [40 CFR 52.21 BACT]
 - (F) Any 30-consecutive day average greater than 300 ppm CO by volume corrected to 8% oxygen for the No. 6 Recovery Furnace. [40 CFR 52.21 BACT]
 - (G) Any 30-consecutive day average greater than 300 ppm CO by volume corrected to 8% oxygen for the No. 5 Recovery Furnace, after the modifications to the No. 5 Recovery Furnace as described in Application 16576, dated January 18, 2006. [40 CFR 52.21 BACT]

- (H) Any determination that the oil combusted in the No. 6 Recovery Furnace does not meet the definition of very low sulfur oil as defined under Condition 3.2.13.
 [40 CFR 60.41b]
- (I) All times when gases from the Brownstock Washer System (Source Codes PG30, PG32, and PG34) are not routed through the closed-vent system to the No. 5 Recovery Furnace. This Condition shall become applicable upon completion of the modification as described by Application No. 607947.
 [40 CFR 60.284a(d)(3)(iii); 40 CFR 60.284a(e)(1)(vi) and (2)
- ii. No. 5 Lime Kiln Scrubber (Source Code LKS1) Any 12-hour average greater than 8 ppm TRS on a dry basis, corrected to 10% oxygen by volume from the No. 5 Lime Kiln Scrubber.
- iii. Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706 and U707)
 - (A) Any 6-minute period during which the opacity of the exit stack gas of the No. 4 Power Boiler is greater than 40%.
 [391-3-1-.02(2)(b)1]
 - (B) Any 6-minute period during which the opacity from the No. 4 Power Boiler is greater than 10%.
 [Table 8 to 40 CFR 63 Subpart DDDDD, 40 CFR 63.525(c), 40 CFR 63.535]
 - (C) Any 6-minute period for which the opacity from the No. 6 Power Boiler is greater than 20%, except for one 6-minute period per hour of not more than 27%, when burning fuel oil.
 [40 CFR 60 Subpart Db]
 - (D) Any 30-consecutive day period during which the average NOx emissions from the No. 6 Power Boiler are greater than the values specified in or as calculated in Condition 3.3.6.a.
 - (E) Any 30-consecutive day period during which the average NOx emissions from the No. 7 Power Boiler are greater than the values specified in or as calculated in Condition 3.3.5.c.
 - (F) Any determination that the oil combusted in the No. 6 Power Boiler or the No. 7 Power Boiler does not meet the definition of very low sulfur oil as defined under Condition 3.3.2.
 - (G) Any 12-consecutive month period during which SO₂ emissions from the No. 4 Power Boiler exceed 568 tons.
 [40 CFR 51.308 Regional Haze]

- (H) Any 12-consecutive month period during which NO_X emissions from the No. 4 Power Boiler exceed 682 tons.
 [40 CFR 52.21 Avoidance]
- (I) Any 12-consecutive month period during which CO emissions from the No. 4 Power Boiler exceed 1,183 tons.
 [40 CFR 52.21 Avoidance]
- (J) Any 12-consecutive month period during which VOC emissions from the No. 4 Power Boiler exceed 63 tons.
 [40 CFR 52.21 Avoidance]
- iv. Cluster Rule
 - (A) Any periods during which the time of excess emissions divided by the total process operating time in a semi-annual reporting period exceeds the following levels:
 [40 CFR 63.443(e)]
 - (I) 1% for the control devices that are used to reduce the total HAP emissions from the LVHC system.
 - (II) 4% for control devices used to reduce the total HAP from the HVLC system; and
 - (III) 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.
 - (B) Any periods during which the time of excess emissions divided by the total process operating time in a semi-annual reporting period exceeds 10% for the steam stripper system. The steam stripper system consists of No. 1 and No. 2 Strippers (Source Codes R441 and R500). For the purposes of this condition, the total process operating time should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day. [40 CFR 63.446(g)]

- b. Exceedances: (means for the purpose of this Condition and Condition 6.1.4, any condition that is detected by monitoring or record keeping that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) do not meet the applicable emission limitation or standard consistent with the averaging period specified for averaging the results of the monitoring)
 - i. Cluster Rule
 - (A) Any 15-day period of process operation during which the pulping process condensates from the equipment listed in Condition 3.3.14 in total contain less than a total HAP mass of 11.1 lb/ton ODP. The 15-day period of process operation shall not include periods of Pre-Evaporator system downtime, provided that the total Pre-Evaporator system downtime divided by the digester process operating time does not exceed 10%. Any Pre-Evaporator system downtime in excess of the 10% shall be included in the 15-day period of process operation. For the purposes of this condition, the total process operating time and the 15-day rolling average should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day. [40 CFR 63.446(c)(3), 391-3-1-.02(2)(a)10]
 - (B) Any 15-day period of process operation as included in Condition 6.1.7.b.i.(A) during which the treated pulping process condensates from the equipment listed in Condition 3.3.14 have not been treated to remove at least 10.2 lb of total HAP mass/ton ODP. The 15-day period of process operation shall not include periods of Pre-Evaporator system downtime, provided that the total Pre-Evaporator system downtime divided by the digester process operating time does not exceed 10%. Any Pre-Evaporator system downtime in excess of the 10% shall be included in the 15-day period of process operating time and the 15-day rolling average should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day.

[40 CFR 63.446(c)(3)]

- (C) Any 5-minute period of process operation during which any portion of the total HAP emissions from each LVHC system in the kraft pulp mill are not controlled.
 [40 CFR 63.443(a)(1)(i) and (a)(2)]
- (D) Any 5-minute period of process operation during which any portion of the total HAP emissions from each HVLC system in the kraft pulp mill are not controlled.
 [40 CFR 63.443(a)(1)(ii) and (a)(2)]

- ii. Nos. 6 and 7 Power Boilers (Source Codes U706 and U707)
 - (A) Any monthly determination in which the 12-consecutive month total of fuel oil combusted in the No. 7 Power Boiler exceeds 1,050,000 gallons.
 - (B) Any monthly determination in which the 12-consecutive month total of NO_X emissions from the No. 7 Power Boiler exceeds 39.1 tons.
 - (C) Any monthly determination in which the 12-consecutive month total of No. 2 fuel oil burned in the No. 6 Power Boiler exceeds 2,508,114 gallons.
 - (D) Any time of process operation during which the annual capacity factor for oil fired in the No. 6 or 7 Power Boilers is greater than 10%. The annual capacity factor is determined on a 12-month rolling average basis, with a new annual capacity factor calculated at the end of each calendar month, as calculated per Condition 6.2.12.
- iii. Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407)
 - (A) Any monthly determination in which the 12-consecutive month total of fuel oil combusted in the No. 6 Recovery Furnace exceeds 1,540,012 gallons.
 - (B) Any monthly determination in which the 12-consecutive month total of fuel oil combusted in the No. 5 Recovery Furnace exceeds 2,100,000 gallons.
 [40 CFR 52.21 Avoidance]
 - (C) Any 12-hour average greater than 4 ppm H₂S by volume corrected to 8% oxygen for the No. 5 Recovery Furnace as calculated per Condition 6.2.27, after the modifications to the No. 5 Recovery Furnace as described by Application No. 16576 dated January 18, 2006. [40 CFR 52.21 BACT]
 - (D) Any 12-hour average greater than 4 ppm H₂S by volume corrected to 8% oxygen for the No. 6 Recovery Furnace as calculated per Condition 6.2.27.
 [40 CFR 52.21 BACT]
 - (E) Any time of process operation during which the annual capacity factor for oil and gas fired in the No. 6 Recovery Furnace is greater than 10%. The annual capacity factor is determined on a 12-month rolling average basis, with a new annual capacity factor calculated at the end of each calendar month, as calculated per Condition 6.2.12.

iv. During periods when spent liquor is fed, excess opacity emissions shall be a violation of 40 CFR 63 Subpart MM if the total monitoring period divided by the total period of operating time is in excess of 2% within any semiannual period.

[40 CFR 63.864(k)(2)(i)]

- (A) During periods when spent liquor is being fed, any semiannual period when the opacity reading is greater than 35% for 2% or more of the operating time for the No. 5 Recovery Furnace.
- (B) During periods when spent liquor is being fed, any semiannual period when the opacity reading is greater than 35% for 2% or more of the operating time for the No. 6 Recovery Furnace
- v. Periods of monitoring exceedances reported for Condition 6.1.7.b.iv shall be a violation of 40 CFR 63 Subpart MM when six or more 3-hour average parameter values within any 6-month reporting period are outside the parameter limits listed below. For purposes of determining the number of non-opacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period. Note: The above-mentioned provisions are only for determining 40 CFR 63 Subpart MM exceedances. Single event exceedances of the following parameters still occur for other regulations. [40 CFR 63.864(k)(2)(iv) and(v); 40 CFR 63.864(k)(3)]
 - (A) Any 3-hour block average in which the secondary power for the No. 5 Lime Kiln ESP (Source Code LEP1) is less than 43,620 volt-amps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate greater than 385 tons per day or burning No. 6 fuel oil.
 - (B) When lime mud is being fed, any 3-hour rolling average in which the scrubbant recirculation rate from the No. 5 Lime Kiln Scrubber (Source Code LKS1) is less than 866 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate greater than 385 tons per day or burning No. 6 fuel oil.
 - (C) When lime mud is being fed, any 3-hour rolling average in which the scrubbant supply pressure for the No. 5 Lime Kiln Scrubber (Source Code LKS1) is less than 228 psi, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate greater than 385 tons per day or burning No. 6 fuel oil.

- (D) When lime mud is being fed, any 3-hour rolling average in which the scrubbant recirculation rate from the No. 5 Lime Kiln Scrubber (Source Code LKS1) is less than 918 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate equal to or less than than 385 tons per day and in which the secondary power for the No. 5 Lime Kiln ESP (Source Code LEP1) is less than 3,620 volt-amps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
- (E) When lime mud is being fed, any 3-hour rolling average in which the scrubbant supply pressure for the No. 5 Lime Kiln Scrubber (Source Code LKS1) is less than 176 psi, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate equal to or less than than 385 tons per day and in which the secondary power for the No. 5 Lime Kiln ESP (Source Code LEP1) is less than 3,620 volt-amps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
- (F) When spent pulping liquor is being fed, any 3-hour rolling average in which the differential pressure drop across the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) is less than 2.5 inches of water, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, with the exception of differential pressure drop during periods of startup and shutdown.
- (G) When spent pulping liquor is being fed, any 3-hour rolling average in which the scrubbant flow rate from the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) is less than 268 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
- (H) When spent pulping liquor is being fed, any 3-hour rolling average in which the scrubbant flow rate from the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) is less than 42 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
- (I) When spent pulping liquor is being fed, any 3-hour rolling average in which the fan amperage for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) is less than the value determined in accordance with Condition 4.2.7, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.

- (J) When spent pulping liquor is being fed and prior to establishing the fan amperage limit for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6), any 3-hour rolling average in which the scrubbant supply pressure is less than 59 psi, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [Subpart MM Alternative Monitoring Request, 2004]
- vi. No. 4 Power Boiler (Source Code U700)
 - (A) Any monthly determination in which the 12-consecutive month total of tire derived fuel (TDF) combusted in the No. 4 Power Boiler exceeds 36,500 tons.
 [40 CFR 52.21 Avoidance]
 - (B) Any monthly determination in which the 12-consecutive month total of bone dry sludge combusted in the No. 4 Power Boiler exceeds 25,550 tons.
 [40 CFR 52.21 Avoidance]
- vii. No. 5 Smelt Dissolving Tank (Source Code R403)
 - (A) When spent pulping liquor is being fed, any 12-hour block average in which the scrubbant flow rate from the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) is less than 268 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [40 CFR 60.284a(d)(4)(i)]
 - (B) When spent pulping liquor is being fed, any 12-hour block average in which the differential pressure drop across the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) is less than 2.5 inches of water, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests. [40 CFR 60.284a(d)(4)(ii)]
- viii. No. 6 Smelt Dissolving Tank (Source Code R408)
 - (A) When spent pulping liquor is being fed, any 12-hour block average in which the scrubbant flow rate from the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) is less than 424 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [40 CFR 60.284a(d)(4)(i)]

(B) When spent pulping liquor is being fed and prior to establishing the fan amperage limit for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6), any 12-hour block average in which the scrubbant supply pressure from the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) is less than 59 psi, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.

[Subpart MM – Alternative Monitoring Request, 2004]

- **(B)** When spent pulping liquor is being fed and after establishing the fan amperage limit for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6), any 12-hour block average in which the fan amperage for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) is less than the value determined in accordance with Condition 4.2.7, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests. [40 CFR 60.284a(b)(2)(iii)]
- c. Excursions: (means for the purpose of this Condition and Condition 6.1.4, any departure from an indicator range or value established for monitoring consistent with any averaging period specified for averaging the results of the monitoring)
 - i. Lime Silos (Source Codes L540 and L541) - Any 2 consecutive required determinations during which the pressure drop across the Lime Silo Baghouses (Source Codes LBH1 and LBH2) is less than 0.05 inches of water.
 - Nos. 5 and 6 Smelt Dissolving Tank Scrubbers (Source Codes RSS5 and RSS6) ii.
 - (A) Any 3-hour average in which the Weak Water Makeup Flow Rate to the No. 5 Smelt Dissolving Tank Scrubber is less than 20 gpm.
 - iii. Bleach Plant Scrubber (Source Codes BPS4)
 - (A) Any 3-hour rolling average in which the liquid-to-air ratio for the No. 4 Bleach Plant Scrubber is less than 0.032 gal/scfm, or the operating range for the monitoring parameter as appropriate base upon values recorded during subsequent performance tests.
 - **(B)** Any 3-hour rolling average in which the oxidation/reduction potential of the recirculation flow for the No. 4 Bleach Plant Scrubber is greater than -86 µohms, or the operating range for the monitoring parameter as appropriate base upon values recorded during subsequent performance tests.
 - (C) Any required determination in which the scrubbant temperature for the SVP-LITE Tail Gas Scrubber is greater than 50°F, or the operating range for the monitoring parameter as appropriate base upon values recorded during subsequent performance tests.

- (D) Any required determination in which the scrubbant flow rate for the SVP-LITE Tail Gas Scrubber is less than 350 gpm, or the operating range for the monitoring parameter as appropriate base upon values recorded during subsequent performance tests.
- iv. Bark Transfer Cyclone (Source Code U703) Any 2-consecutive adverse condition discovered by the inspections of the Bark Transfer Cyclone per Conditions 5.2.7 and 5.2.8.
- v. Nos. 1 and 2 Steam Strippers (Source Codes R441 and R500)
 - (A) Any 3-hour average during which the steam-to-condensate ratio or process wastewater column feed temperature for the No. 1 Steam Stripper measured in accordance with Condition 5.2.2.e, is less than 90% of the following or the most recent tested value approved by the Division:
 [40 CFR 63.453(g), EPA approved alternative monitoring plan dated October 30, 2002]
 - (I) Steam-to-condensate ratio less than 1.58 lbs/gal
 - (II) Process Wastewater Column Feed Temperature less than 145°F.
 - (B) Any 3-hour average during which the steam-to-condensate ratio or process wastewater column feed temperature for the No. 2 Steam Stripper measured in accordance with Condition 5.2.2.f, is less than 90% of the following of the most recent tested value approved by the Division:
 [40 CFR 63.453(g), EPA approved alternative monitoring plan dated October 30, 2002]
 - (I) Steam-to-condensate ratio: 1.82
 - (II) Process Wastewater Column Feed Temperature: 234°F.
- d. In addition to the excess emissions, exceedances and excursions specified above, the following should also be included with the report required in Condition 6.1.4:
 - i. Lime Storage Silo (Source Codes L540 and L541) The Permittee shall note the nature and time of corrective actions taken to reduce opacity from either the East or West Lime Storage Silos as determined per Condition 6.2.3. Failure to take corrective action within 12 hours or for the corrective action to remedy the discrepancy prior to the next period of surveillance constitutes a deviation from compliance and shall be reported to the Division in writing.

- ii. Nos. 6 and 7 Power Boilers (Source Codes U706 and U707)
 - (A) The monthly and 12-month rolling total amount of oil burned in the No. 6 Power Boiler.
 - (B) The monthly total of NO_X emissions from the No. 7 Power Boiler for each month in the calendar quarter.
 - (C) The 12-month rolling total NO_X emissions from the No. 7 Power Boiler as calculated by Condition 6.2.6.
 - (D) The annual capacity factor for each of the Nos. 6 and 7 Power Boilers as calculated in Condition 6.2.12.
- iii. When spent pulping liquor is being fed, any period when 10 consecutive 6-minute opacity averages result in a measurement greater than 20% opacity for the No. 5 Recovery Furnace (Source Code R401).
 [40 CFR 63.864(k)(1)(i)]
- iv. When spent pulping liquor is being fed, any period when 10 consecutive 6-minute opacity averages result in a measurement greater than 20% opacity for the No. 6 Recovery Furnace (Source Code R407).
 [40 CFR 63.864(k)(1)(i)]
- v. No. 4 Power Boiler (Source Code U700)
 - (A) Each month's 12-month rolling total SO₂ emissions from the No. 4 Power Boiler as calculated by Condition 6.2.7.
 - (B) Each month's 12-month rolling total CO emissions from the No. 4 Power Boiler as calculated by Condition 6.2.8.
 - (C) Each month's 12-month rolling total VOC emissions from the No. 4 Power Boiler as calculated by Condition 6.2.9.
 - (D) Each month's 12-month rolling total NO_X emissions from the No. 4 Power Boiler as determined by Condition 6.2.10.
- vi. The 15-day rolling average of total HAP mass of collected condensates and treated condensates, per the records required by Condition 6.2.13 and 6.2.14. [40 CFR 63.446]
- vii. The Permittee shall note the time and duration during each quarter that the No. 5 Lime Kiln ESP (Source Code LEP1) is shut down and the No. 5 Lime Kiln (Source Code L537) continues to operate at a lime production rate less than or equal to 385 tons per day and firing No. 6 fuel oil.

6.2 Specific Record Keeping and Reporting Requirements

No 5. Lime Kiln (Source Code L537)

- 6.2.1 The Permittee shall determine, keep and record monthly the following for the No. 5 Lime Kiln:[40 CFR 60 Subpart BBa, 391-3-1-.02(2)(e)]
 - a. Type of fuel burned.
 - b. Quantities of each fuel burned.
 - c. Quantity of mud solids fed as process input.

Lime Storage Silos (Source Codes L541 and L540)

- 6.2.2 The Permittee shall maintain a daily log of truck unloading for the East and West Lime Storage Silos. This log shall include, but not be limited to, the date, time and duration of truck unloading (hr:min).[391-3-1-.02(6)(b)]
- 6.2.3 The Permittee shall visually observe the opacity from the East and West Lime Storage Silos during each loading of the silos. If any observable emissions occur during unloading, immediate corrective action must be taken. Inspection results must be documented in the log maintained per Condition 6.2.2. [391-3-1-.02(6)(b)]

Nos. 4, 6, and 7 Power Boilers (Source Codes U700, U706 and U707)

- 6.2.4 The Permittee shall measure and record the total amount of No. 6 fuel oil, natural gas, bark, tire derived fuel, and sludge burned in the No. 4 Power Boiler each operating day. [391-3-1-.02(6)(b)]
- 6.2.5 The Permittee shall maintain records of hourly production rates, maintenance and inspection of all dust control devices and fugitive dust emission points for the No. 4 Power Boiler. This information shall be recorded in a permanent form suitable and available for inspection.[391-3-1-.02(6)(b)]

6.2.6 The 12-month rolling total of NO_X emissions from the No. 7 Power Boiler shall be calculated using the following equation and emission factors: [391-3-1-.02(6)(b)]

$$T = \frac{\left[XH_1F_1 + YH_2F_2\right]}{2 \times 10^9}$$

- where: T = total NOx emissions for previous 12-month period (tons) X = gallons of fuel oil burned in the previous 12-month period Y = scf of natural gas burned in previous 12-month period $H_1 = \text{heating value for No. 2 fuel oil (135,560 Btu/gal)}$ $H_2 = \text{heating factor for natural gas (1,000 Btu/scf)}$ $F_1 \text{ and } F_2 = \text{permit emission factors}$ $F_1 = 0.1 \text{ lb/MMBtu}$ $F_2 = 0.08 \text{ lb/MMbtu}$
- 6.2.7 Using the fuel usage records required by Condition 6.2.4, the Permittee shall use fuel-specific and site-specific emission factors to calculate monthly SO₂ emissions from the No. 4 Power Boiler. All calculations used to determine the total must be kept as part of the record. The monthly emissions shall be used to calculate the 12-month rolling total of SO₂ emissions. Each month's 12-month rolling total shall be the sum of the current month's emissions plus the previous 11 months' emissions. Any 12-month rolling total that exceeds 568 tons SO₂ per year must be reported per Condition 6.1.7.a.iii(G). [40 CFR 51.308 Regional Haze]
- 6.2.8 Using the monitoring data acquired in Condition 5.2.1.f and heat input data, the Permittee shall calculate monthly CO emissions from the No. 4 Power Boiler. All calculations used to determine the total must be kept as part of the record. The monthly emissions shall be used to calculate the 12-month rolling total CO emissions. Each month's 12-month rolling total shall be the sum of the current month's emissions plus the previous 11 months' emissions. Any 12-month rolling total that exceeds 1,183 tons CO per year must be reported per Condition 6.1.7.a.iii(I). [40 CFR 52.21 Avoidance]
- 6.2.9 Using the fuel usage records required by Condition 6.2.4, the Permittee shall use fuel-specific and site-specific emission factors to calculate monthly VOC emissions from the No. 4 Power Boiler. All calculations used to determine the total must be kept as part of the record. The monthly emissions shall be used to calculate the 12-month rolling total VOC emissions. Each month's 12-month rolling total shall be the sum of the current month's emissions plus the previous 11 months' emissions. Any 12-month rolling total that exceeds 63 tons VOC per year must be reported per Condition 6.1.7.a.iii(J). [40 CFR 52.21 Avoidance]

6.2.10 Using the data acquired by Condition 5.2.1.f, the Permittee shall determine monthly NO_X emissions from the No. 4 Power Boiler. All calculations used to determine the total must be kept as part of the record. The monthly emissions shall be used to calculate the 12-month rolling total NO_X emissions. Each month's 12-month rolling total shall be the sum of the current month's emissions plus the previous 11 months' emissions. Any 12-month rolling total that exceeds 682 tons NO_X per year must be reported per Condition 6.1.7.a.iii(H).
[40 CFR 52.21 Avoidance]

Fuel Oil

- 6.2.11 For each shipment of fuel oil or residual oil (for the purposes of this permit, residual oil is defined as any fuel oil that does not comply with the specifications of fuel oil numbers 1 and 2 as defined by ASTM D396 "*Standard Specifications Fuel Oils*" and all fuel oil numbers 4, 5, and 6, as defined by ASTM D396) received to be fired in the No. 4 Power Boiler, No. 5 Recovery Furnace, and No. 5 Lime Kiln (Source Codes U700, R401 and L537), the Permittee shall obtain from the supplier, certification that the sulfur content of the fuel oil complies with the limit contained in Conditions 3.4.1, 3.4.9, and 3.4.12. The fuel supplier certification shall contain the following information: [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
 - a. The name of the oil supplier.
 - b. The location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil, specifically including whether the oil was sampled as delivered to the Permittee or whether the sample was drawn from oil in storage at the oil supplier's or oil refiner's facility, or other location.
 - c. The sulfur content of the oil from which the shipment came (or of the shipment itself).
 - d. The method used to determine the sulfur content of the oil.
 - e. Quantity of fuel oil delivered.
 - f. Heat content of fuel oil delivered.
- 6.2.12 In accordance with 40 CFR 60.49b(d), the Permittee shall record and maintain records of the amounts of each fuel combusted in the Nos. 6 and 7 Power Boilers and the No. 6 Recovery Boiler (Source Codes U706, U707, and R407) for each day and calculate the annual capacity factor individually for distillate oil for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated for each calendar month. [40 CFR 60.49b(d)]

Cluster Rule

- 6.2.13 The Permittee shall maintain records sufficient to calculate the total HAP mass of the pulping process condensates collected according to Condition 3.3.14. Following the date of initial compliance and using these condensate collection records, the Permittee shall calculate and record the 15-day rolling average for the total HAP mass of collected condensates. For the purposes of this condition, the 15-day rolling average should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.14 The Permittee shall maintain records sufficient to calculate the total HAP mass of the pulping process condensates reduced or destroyed according to Condition 3.3.17. Following the date of initial compliance and using these records, the Permittee shall calculate and record the 15-day rolling average for the total HAP mass reduced or destroyed. For the purposes of this condition, the 15-day rolling average should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.15 For each applicable enclosure opening, closed-vent system, and closed collection system subject to 40 CFR 63 Subpart S, the Permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection: [40 CFR 63.454(b)]
 - a. Date of inspection;
 - b. The equipment type and identification;
 - c. Results of negative pressure tests for enclosures;
 - d. Results of leak detection tests;
 - e. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);
 - f. The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
 - g. Repair methods applied in each attempt to repair the defect or leak;
 - h. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
 - i. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;

- j. The date of successful repair of the defect or leak;
- k. The position and duration of opening of bypass line valves and the condition of any valve seals; and
- 1. The duration of the use of bypass valves on computer controlled valves.
- 6.2.16 The Permittee shall maintain records of any periods during which there are excess emissions, and the duration of such emissions, from either the No. 1 Steam Stripper or the No. 2 Steam Stripper (Source Codes R441 and R500) as they relate to the information needed to determine compliance with the equipment update requirement referenced in Condition 6.1.7.a.iv(B). For the purposes of this condition, the total stripper operating times should be based on mill operating days which are defined as beginning at 7:00 AM of the calendar date and ending at 7:00 AM of the following day. [40 CFR 63.446(g)]
- 6.2.17 At all times, the Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Division which may include, but is not limited to, monitoring results, review of operation and maintenance [40 CFR 63.860(d)]

Wastewater Treatment Area - Aerated Stabilization Basin (Source Code O900)

- 6.2.18 The Permittee shall observe and record the existence and extent of any foam accumulation on the surface of the Aerated Stabilization Basin at least four times during the daylight hours of each day.[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.19 The Permittee shall maintain records of the operation of the defoamer additive system on the Aerated Stabilization Basin.[391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]

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- 6.2.20 The operating ranges for the monitoring parameters in Conditions 5.2.2.b through 5.2.2.d, 5.2.3.a, and 5.2.3.d using data collected during previous performance tests per Condition 4.2.3 must be submitted to the Division for approval. If the Permittee conducts additional performance tests per the requirements of 40 CFR 63.865 for the purposes of reestablishing the operating parameter ranges, the operating ranges must be submitted to the Division for approval within 60 days of the performance test. In the submittal, the Permittee must certify that no control techniques and processes have been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.21 The Permittee shall notify the Division prior to any of the following:
 - a. The air pollution control system is modified or replaced for the following process units: No. 5 Recovery Furnace, No. 6 Recovery Furnace, No. 5 Smelt Dissolving Tank, No. 6 Smelt Dissolving Tank, or No. 5 Lime Kiln (Source Codes R401, R407, R403, R408, or L537).
 [40 CFR 63.867(b)(3)(i)]
 - A change in a continuous monitoring parameter, the value of a continuous monitoring parameter, or the range of values for a continuous monitoring parameter for the following process units: No. 5 Recovery Furnace, No. 6 Recovery Furnace, No. 5 Smelt Dissolving Tank, No. 6 Smelt Dissolving Tank, or No. 5 Lime Kiln (Source Codes R401, R407, R403, R408, or L537) [40 CFR 63.867(b)(3)(iii)]
 - c. An increase in the daily black liquor solids firing rate for the No. 5 Recovery Furnace or No. 6 Recovery Furnace (Source Codes R401 and R408) during any 24-hour averaging period by more than 10% above the level measured in the most recent performance test pursuant to 40 CFR 63 Subpart MM. [40 CFR 63.867(b)(3)(iv)]
- 6.2.22 The Permittee shall implement the corrective action plan if any of the following monitoring exceedances occur during times when spent pulping liquor or lime mud is fed (as applicable). Corrective action can include completion of transient startup and shutdown conditions as expediently as possible:[40 CFR 63.864(k)(1)]
 - a. No. 5 Recovery Furnace (Source Code R401) opacity greater than 20% for 10 consecutive 6-minute averages.
 [40 CFR 63.864(k)(1)(i)]
 - b. No. 6 Recovery Furnace (Source Code R407) opacity greater than 20% for 10 consecutive 6-minute averages.
 [40 CFR 63.864(k)(1)(i)]

c. No. 5 Lime Kiln ESP (Source Code LEP1) secondary power less than 3,620-voltamps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, while operating at a lime production rate greater than 385 tons per day or burning No. 6 fuel oil for any 3-hour block average.

[40 CFR 63.864(k)(1)(vi)]

No. 5 Lime Kiln Scrubber (Source Code LKS1) scrubbant supply pressure less than 228 psig, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average.
 [40 CFR 63.864(e)(13), 40 CFR 63.864(k)(1)(ii)]

e. No. 5 Lime Kiln Scrubber (Source Code LKS1) scrubbant recirculation flow rate less than 866 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average while operating at a lime production rate greater than 385 tons per day or burning No. 6 fuel oil.

[40 CFR 63.864(k)(1)(iii)]

f. No. 5 Lime Kiln Scrubber (Source Code LKS1) scrubbant supply pressure less than 176 psig, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average while operating at a lime production rate equal to or less than 385 tons per day and the secondary power is less than 3,620-volt-amps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.

[40 CFR 63.864(e)(13), 40 CFR 63.864(k)(1)(ii)]

- g. No. 5 Lime Kiln Scrubber (Source Code LKS1) scrubbant recirculation flow rate less than 918 psig, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average while operating at a lime production rate equal to or less than 385 tons per day and the secondary power is less than 3,620-volt-amps, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests. [40 CFR 63.864(k)(1)(iii)]
- h. No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) differential pressure less than 2.5 inches of water, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average with the exception of periods of startup and shutdown. [40 CFR 63.864(k)(1)(ii)]

No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5) scrubbant flow rate less than 268 gpm, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests, for any 3-hour rolling average.
 [40 CFR 63.864(k)(1)(ii)]

j. No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) fan amperage 3-hour rolling average less than the value determined in accordance with Condition 4.2.7, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [40 CFR 63.864(k)(1)(vii)]

- k. No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) scrubbant flow rate less than 424 gpm for any 3-hour rolling average, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [40 CFR 63.864(k)(1)(ii)]
- No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6), prior to establishing the fan amperage limit, scrubbant supply pressure less than 59 psi, or the operating range for the monitoring parameter as appropriate based upon values recorded during subsequent performance tests.
 [Subpart MM – Alternative Monitoring Request, 2004]
- 6.2.23 The Permittee shall maintain records of any occurrence when corrective action is required by Condition 6.2.22 and when a violation is noted under Conditions 6.1.7.b.iv or 6.1.7.b.v. [40 CFR 63.866(b)]
- 6.2.24 The Permittee shall report quarterly if a measured parameter meets any of the conditions specified in Condition 6.2.22 or Conditions 6.1.7.b.iv and 6.1.7.b.v. This report must contain the information specified in 40 CFR 63.10(c) as well as the number and duration of occurrences when the source met or exceeded the conditions in Conditions 6.1.7.b.iv and 6.1.7.b.v, and the number and duration of occurrences when the source met or exceeded the conditions below the 40 CFR 63 Subpart MM thresholds of Condition 6.2.22 or Conditions 6.1.7.b.iv and 6.1.7.b.v does not constitute a violation of 40 CFR 63 Subpart MM. When no exceedances of parameters have occurred, the Permittee shall submit a semiannual report stating that no excess emissions and/or summary reports for the mill with the requirements of 40 CFR 63 Subpart S. [40 CFR 63.867(c)]
- 6.2.25 In addition to the general records required by 40 CFR 63.10(b)(2), the Permittee shall maintain records of the following information:[40 CFR 63.866(c)]
 - a. Calcium oxide (CaO) production rates in Mg/day or ton/day for the No. 5 Lime Kiln (Source Code L537).
 [40 CFR 63.866(c)(2)]

- b. Records of scrubbant supply pressure for the No. 5 Lime Kiln Scrubber (Source Code LKS1), scrubbant supply pressure for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6) until the fan amperage value is established in accordance with Condition 4.2.7, scrubbant flow rate for the No. 5 Lime Kiln and Nos. 5 and 6 Smelt Dissolving Tank Scrubbers (Source Codes LKS1, RSS5 and RSS6), pressure drop for the No. 5 Smelt Dissolving Tank Scrubber (Source Code RSS5), fan amperage (once the value is established as described in Condition 4.2.7) for the No. 6 Smelt Dissolving Tank Scrubber (Source Code RSS6), and total secondary power for No. 5 Lime Kiln ESP (Source Codes LEP1). Records shall include any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken. [40 CFR 63.866(c)(3)]
- Records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(b).
 [40 CFR 63.866(c)(4)]
- Records of monitoring parameter ranges established for the No. 5 Lime Kiln Scrubber, Nos. 5 and 6 Smelt Dissolving Tank Scrubbers, and No. 5 Lime Kiln ESP (Source Codes LKS1, RSS5, RSS6, and LEP1).
 [40 CFR 63.866(c)(5)]

40 CFR 63 Subpart GGGGG

6.2.26 The Permittee shall prepare and maintain written documentation to support the determination of the HAP quantity used to demonstrate that the total quantity of remediation material (as listed in Table 1 of 40 CFR 63 Subpart GGGGG) that was/will be excavated, extracted, pumped, or otherwise removed during any site remediation at the facility is less than 1 megagram per year of total HAP. This documentation must include a description of the methodology and data used to determine the total HAP content of the material.

[40 CFR 63.7881(c)(1) and 40 CFR 63.7881(c)(2)]

Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407)

6.2.27 The Permittee shall use the emissions data acquired by Condition 5.2.1.c.i to calculate the H₂S emissions from the No. 6 Recovery Furnace, respectively. All calculations and records used to determine the emissions shall be kept as part of the record. Any 12-hour average in excess of 4 ppm, by volume, corrected to 8% oxygen, shall be reported as an exceedance in Condition 6.1.7.b.iii(C).
[40 CFR 52.21 BACT]

6.2.28 The Permittee shall use the monitoring data acquired in Condition 5.2.3.d.iv to determine the 12-month rolling total of fuel oil fired in the No. 5 Recovery Furnace. All calculations and records used to determine the emissions shall be kept as part of the record. Any 12-month rolling total in excess of 2,100,000 gallons shall be reported as an exceedance in Condition 6.1.7.b.iii(B).
[40 CFR 52.21 BACT]

Other Units

6.2.29 The Permittee shall submit for Division approval, within 120 days of startup of each piece of equipment referenced, a method to determine on-going compliance with the emission limits and work practices listed in Conditions 3.2.20 and 3.2.21.[40 CFR 52.21 BACT and BACT Work Practices]

Woodyard Area (Equipment Group WY01)

6.2.30 The Permittee shall maintain a record of all actions taken to suppress fugitive dust from the Woodyard areas and any other sources of fugitive dust per the requirements of Condition 3.4.21. Such records shall include date and time of occurrence and a description of actions taken.
[40 CFR 70.63(a)(3)(i) and 391-3-1-.02(2)(n)]

40 CFR 60 Subpart Db

6.2.31 The Permittee shall obtain and maintain fuel receipts from the fuel supplier which certify that the oil meets the definition of very low sulfur oil as defined under Conditions 3.2.13 and 3.3.2. Reports shall be submitted certifying that only very low sulfur oil meeting this definition was combusted in the No. 6 Power Boiler, No. 7 Power Boiler, and no. 6 Recovery Furnace (Source Codes U706, U707, and R407) during the preceding quarter. [40 CFR 60.49b(r) and 40 CFR 52.21 Avoidance]

HAP Emissions

6.2.32 The Permittee shall record any time after the specified compliance date during which the total HAP emissions from the equipment listed in Conditions 3.3.8 and 3.3.9 are not controlled.[391-3-1-.02(6)(b)1]

Application No. 20887

- 6.2.33 Before beginning actual modification of the Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407) as described by Application No. 20887 dated December 15, 2011, the Permittee shall document and maintain a record of the following information: [391-3-1-.02(7)(b)15.(i)(I)]
 - a. Description of project;

- b. Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
- c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emission, the projected actual emissions, the amount of emissions excluded under 40 CFR 52.21(b)(41)(ii)(c) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
- d. The records required above shall be retained for a period of 10 years following resumption of regular operations after the change, or for a period of 15 years following resumption of regular operations after the change if the project increased the design capacity of or potential to emit of a regulated NSR pollutant at such emissions unit.
- 6.2.34 The Permittee shall maintain the following records for a period of 10 years following resumption of regular operations after the modification to the Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407) as described in Application No. 20887 dated December 15, 2011:
 - I. A description of the project;
 - II. Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
 - III. A description of the applicability test use to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under Subparagraph (7)(a)2.(ii)(II)III of this rule and an explanation for why such amount was excluded, and any netting calculations, if applicable.

According to Subparagraph (7)(b)15.(i)(IV) of this rule, the Permittee shall calculate and maintain a record of the annual emissions of such pollutants in tons-per-year on a calendar year basis. These records shall be retained for a period of 5 years past the end of each calendar year. If the Permittee is required to or elects to exclude emissions associated with startups, shutdowns, and/or malfunctions from estimations of projected actual emissions for PSD applicability purposes as allowed by Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)II, the Permittee may exclude such emissions from the calculation of annual emissions. [391-3-1-.02(7)(b)15.(i)(III)I]

6.2.35 If the Permittee excluded demand growth emissions from the projected actual emissions for a project and that project is subject to the requirements of Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)III.A.(B), the Permittee shall calculate the actual increase in emissions due to demand growth, in tons per year on a calendar year basis, for a period of 10 years following resumption of regular operations after the change. These records shall be retained for a period of 5 years past the end of each calendar year. [391-3-1-.02(7)(b)15.(i)(IV)] 6.2.36 The Permittee shall submit a report to the Division within 60 days after the end of each year during which records must be generated under Conditions 6.2.34 and 6.2.35 detailing the annual emissions of the Nos. 5 and 6 Recovery Furnaces (Source Codes R401 and R407), and if applicable, the Nos. 5 and 6 Recovery Furnaces' actual increase in emissions due to demand growth during the calendar year that preceded submission of the report. [391-3-1-.02(7)(b)15.(i)(V)]

40 CFR 63 Subpart MM

- 6.2.37 The Permittee must conduct an initial performance test and periodic performance tests using the test methods and procedures listed in 40 CFR 63.7 and 40 CFR 63.865(b). The Permittee must conduct the first of the periodic performance tests by October 13, 2020 and thereafter within 5 years following the previous performance test. Performance tests shall be conducted based on representative performance (*i.e.*, performance based on normal operating conditions) of the affected source for the period being tested. Representative conditions exclude periods of startup and shutdown. The Permittee must record the process information that is necessary to document operating conditions during the test and include in such record an explanation to support that such conditions represent normal operation. Upon request, the Permittee shall make available to the Division such records as may be necessary to determine the conditions of performance tests. [40 CFR 63.865]
- 6.2.38 Within 60 days after the date of completing each performance test (as defined in 40 CFR 63.2) required by Subpart MM, the Permittee must submit the results of the performance test following the procedure specified in either a. or b.:
 - For data collected using test methods supported by the EPA's Electronic Reporting a. Tool (ERT) as listed on the EPA's ERT Web site (https://www.epa.gov/electronicreporting-air-emissions/electronic-reporting-tool-ert) at the time of the test, the Permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (https://cdx.epa.gov/).) Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If the Permittee claims that some of the performance test information being submitted is confidential business information (CBI), the Permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this condition. [40 CFR 63.867(d)(1)(i)]

- b. For data collected using test methods that are not supported by the EPA's ERT as listed on the EPA's ERT Web site at the time of the test, the Permittee must submit the results of the performance test to the Administrator at the appropriate address listed in 40 CFR 63.13 unless the Administrator agrees to or specifies an alternative reporting method.
 [40 CFR 63.867(d)(1)(ii)]
- 6.2.39 If the Permittee is required to electronically submit a report through CEDRI in the EPA's CDX, and due to a planned or actual outage of either the EPA's CEDRI or CDX systems within the period of time beginning 5 business days prior to the date that the submission is due, the Permittee will be or is precluded from accessing CEDRI or CDX and submitting a required report within the time prescribed, the Permittee may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. The Permittee must submit notification to the Administrator in writing as soon as possible following the date that the Permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The Permittee must provide to the Administrator a written description identifying the date, time and length of the outage; a rationale for attributing the delay in reporting beyond the regulatory deadline to the EPA system outage; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the Permittee proposes to report, or if the Permittee has already met the reporting requirement at the time of the notification, the date the Permittee reported. In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved. The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 63.867(d)(3)]
- If the Permittee is required to electronically submit a report through CEDRI in the EPA's 6.2.40 CDX and a force majeure event is about to occur, occurs, or has occurred or there are lingering effects from such an event within the period of time beginning 5 business days prior to the date the submission is due, the Permittee may assert a claim of force majeure for failure to timely comply with the reporting requirement. For the purposes of this section, a force majeure event is defined as an event that will be or has been caused by circumstances beyond the control of the affected facility, its contractors, or any entity controlled by the affected facility that prevents the Permittee from complying with the requirement to submit a report electronically within the time period prescribed. Examples of such events are acts of nature (e.g., hurricanes, earthquakes, or floods), acts of war or terrorism, or equipment failure or safety hazard beyond the control of the affected facility (e.g., large scale power outage). If the Permittee intends to assert a claim of force majeure, the Permittee must submit notification to the Administrator in writing as soon as possible following the date the Permittee first knew, or through due diligence should have known, that the event may cause or caused a delay in reporting. The Permittee must provide to the Administrator a written description of the force majeure event and a rationale for attributing the delay in reporting beyond the regulatory deadline to the force majeure event; describe the measures taken or to be taken to minimize the delay in reporting; and identify a date by which the Permittee proposes to report, or if the Permittee has already met the reporting requirement at the time of the notification, the date the Permittee reported. In any circumstance, the reporting must occur as soon as possible after the force majeure event
occurs. The decision to accept the claim of force majeure and allow an extension to the reporting deadline is solely within the discretion of the Administrator. [40 CFR 63.867(d)(4)]

- 6.2.41 Before beginning construction of the project described by Application No. 28070, the Permittee shall document and maintain a record of the following information: [391-3-1-.02(7)(b)15.(i)(I)]
 - a. Description of project;
 - b. Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
 - c. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emission, the projected actual emissions, the amount of emissions excluded under 40 CFR 52.21(b)(41)(ii)(c) and an explanation for why such amount was excluded, and any netting calculations, if applicable.
 - d. The records required above shall be retained for a period of 10 years following resumption of regular operations after the change, or for a period of 15 years following resumption of regular operations after the change if the project increased the design capacity of or potential to emit of a regulated NSR pollutant at such emissions unit.
- 6.2.42 For the project described by Application No. 28070, the Permittee shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in Condition 6.2.41.b, and calculate and maintain a record of the annual emissions, in tons-per-year on a calendar year basis, for a period of five years following resumption of regular operations after the change, or for a period of ten years following resumption of regular operations after the change if the project increase the design capacity of or potential to emit that regulated NSR pollutant at such emissions unit. These records shall be retained for a period of five years past the end of each calendar year. If the Permittee is required to or elects to exclude emissions associated with startups, shutdowns, and/or malfunctions from estimations of projects actual emissions for PSD applicability purposes as allowed by Georgia Rule 391-3-1-.02(7)(a)2.(ii)(III)II., the Permittee may exclude such emissions from the calculations of annual emissions. [391-3-1-.02(7)(b)15.(i)(III)]
- 6.2.43 For the project described by Application No. 28070, if the Permittee excluded demand growth emissions from the projected actual emissions for a project and that project is subject to the requirements of Georgia Rule 391-3-1-.02(7)(a)2.(ii)(II)III.A.(B), the Permittee shall calculate the actual increase in emissions due to demand growth, in tons per year on calendar year basis, for a period of 10 years following resumption of regular operations after the change. These records shall be retained for a period of five years past the end of each calendar year. [391-3-1-.02(7)(b)15.(i)(IV)]

- 6.2.44 For the project described by Application No. 28070, the Permittee shall submit a report to the Division within 60 days after the end of each year during which records must be generated under Conditions 6.2.42 and 6.2.43, setting out the unit's annual emissions and, if applicable, the unit's actual increase in emissions due to demand growth during the calendar year that preceded submission of the report. [391-3-1-.02(7)(b)15.(i)(V)]
- 6.2.45 The Permittee shall provide written notification to the Division of the date on which the project as described by Application No. 28070 commences construction and the date on which the project is completed. Such notification shall be submitted in writing within 30 days of the dates of record. [391-3-1-.02(6)(b)1 and 40 CFR 70.6(a)(3)(i)]
- 6.2.46 If the Permittee seeks to assert an affirmative defense as described in Condition No. 3.3.37. the Permittee shall submit a written report to the Division with all necessary supporting documentation, that it has met the requirements set forth in Condition No. 3.3.37. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standards (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard. This Condition shall become applicable upon completion of the modification as described by Application No. 607947. [40 CFR 60.286a(b)]
- The Permittee must maintain the following records of malfunctions. This Condition shall 6.2.47 become applicable upon completion of the modification as described by Application No. 607947:

[40 CFR 60.287a(a), (b)(7), and (c)]

- Records of the performance evaluations of the continuous monitoring systems. a.
- Records of excess emissions as defined in 40 CFR 60.284a(d). b.
- Records of the occurrence and duration of each malfunction of operation (i.e., process c. equipment) or the air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in d. accordance with 40 CFR 60.11(d), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

PART 7.0 OTHER SPECIFIC REQUIREMENTS

7.1 Operational Flexibility

- 7.1.1 The Permittee may make Section 502(b)(10) changes as defined in 40 CFR 70.2 without requiring a Permit revision, if the changes are not modifications under any provisions of Title I of the Federal 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). For each such change, the Permittee shall provide the Division and the EPA with written notification as required below in advance of the proposed changes and shall obtain any Permits required under Rules 391-3-1-.03(1) and (2). The Permittee and the Division shall attach each such notice to their copy of this Permit. [391-3-1-.03(10)(b)5 and 40 CFR 70.4(b)(12)(i)]
 - a. For each such change, the Permittee's written notification and application for a construction Permit shall be submitted well in advance of any critical date (typically at least 3 months in advance of any commencement of construction, Permit issuance date, etc.) involved in the change, but no less than seven (7) days in advance of such change and shall include a brief description of the change within the Permitted facility, the date on which the change is proposed to occur, any change in emissions, and any Permit term or condition that is no longer applicable as a result of the change.
 - b. The Permit shield described in Condition 8.16.1 shall not apply to any change made pursuant to this condition.

7.2 Off-Permit Changes

- 7.2.1 The Permittee may make changes that are not addressed or prohibited by this Permit, other than those described in Condition 7.2.2 below, without a Permit revision, provided the following requirements are met:[391-3-1-.03(10)(b)6 and 40 CFR 70.4(b)(14)]
 - a. Each such change shall meet all applicable requirements and shall not violate any existing Permit term or condition.
 - b. The Permittee must provide contemporaneous written notice to the Division and to the EPA of each such change, except for changes that qualify as insignificant under Rule 391-3-1-.03(10)(g). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.
 - c. The change shall not qualify for the Permit shield in Condition 8.16.1.
 - d. The Permittee shall keep a record describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the Permit, and the emissions resulting from those changes.

- 7.2.2 The Permittee shall not make, without a Permit revision, any changes that are not addressed or prohibited by this Permit, if such changes are subject to any requirements under Title IV of the Federal Act or are modifications under any provision of Title I of the Federal Act. [Rule 391-3-1-.03(10)(b)7 and 40 CFR 70.4(b)(15)]
- **7.3** Alternative Requirements [White Paper #2] Not Applicable

7.4 Insignificant Activities

(see Attachment B for the list of Insignificant Activities in existence at the facility at the time of permit issuance)

- **7.5 Temporary Sources** [391-3-1-.03(10)(d)5 and 40 CFR 70.6(e)] Not Applicable
- **7.6 Short-term Activities** Not Applicable
- **7.7 Compliance Schedule/Progress Reports** [391-3-1-.03(10)(d)3 and 40 CFR 70.6I(4)] None Applicable
- **7.8 Emissions Trading** [391-3-1-.03(10)(d)1(ii) and 40 CFR 70.6(a)(10)] Not Applicable
- 7.9 Acid Rain Requirements Not Applicable
- 7.10 Prevention of Accidental Releases (Section 112I of the 1990 CAAA) [391-3-1-.02(10)]
 - 7.10.1 When and if the requirements of 40 CFR Part 68 become applicable, the Permittee shall comply with all applicable requirements of 40 CFR Part 68, including the following.
 - a. The Permittee shall submit a Risk Management Plan (RMP) as provided in 40 CFR 68.150 through 68.185. The RMP shall include a registration that reflects all covered processes.
 - b. For processes eligible for Program 1, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a. and the following additional requirements:
 - i. Analyze the worst-case release scenario for the process(es), as provided in 40 CFR 68.25; document that the nearest public receptor is beyond the distance to a toxic or flammable endpoint defined in 40 CFR 68.22(a); and submit in the RMP the worst-case release scenario as provided in 40 CFR 68.165.

- ii. Complete the five-year accident history for the process as provided in 40 CFR 68.42 and submit in the RMP as provided in 40 CFR 68.168
- iii. Ensure that response actions have been coordinated with local emergency planning and response agencies
- iv. Include a certification in the RMP as specified in 40 CFR 68.12(b)(4)
- c. For processes subject to Program 2, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the Program 2 prevention steps provided in 40 CFR 68.48 through 68.60 or implement the Program 3 prevention steps provided in 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 2 processes as provided in 40 CFR 68.170
- d. For processes subject to Program 3, as provided in 40 CFR 68.10, the Permittee shall comply with 7.10.1.a., 7.10.1.b. and the following additional requirements:
 - i. Develop and implement a management system as provided in 40 CFR 68.15
 - ii. Conduct a hazard assessment as provided in 40 CFR 68.20 through 68.42
 - iii. Implement the prevention requirements of 40 CFR 68.65 through 68.87
 - iv. Develop and implement an emergency response program as provided in 40 CFR 68.90 through 68.95
 - v. Submit as part of the RMP the data on prevention program elements for Program 3 as provided in 40 CFR 68.175
- e. All reports and notification required by 40 CFR Part 68 must be submitted electronically using RMP*eSubmit (information for establishing an account can be found at <u>www.epa.gov/rmp/rmpesubmit</u>). Electronic Signature Agreements should be mailed to:

MAIL

Risk Management Program (RMP) Reporting Center P.O. Box 10162 Fairfax, VA 22038

COURIER & FEDEX

Risk Management Program (RMP) Reporting Center CGI Federal 12601 Fair Lakes Circle Fairfax, VA 22033 Compliance with all requirements of this condition, including the registration and submission of the RMP, shall be included as part of the compliance certification submitted in accordance with Condition 8.14.1.

7.11 Stratospheric Ozone Protection Requirements (Title VI of the CAAA of 1990)

- 7.11.1 If the Permittee performs any of the activities described below or as otherwise defined in 40 CFR Part 82, the Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
 - b. Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
 - c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to 40 CFR 82.166.
 [Note: "MVAC-like appliance" is defined in 40 CFR 82.152.]
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
 - f. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- 7.11.2 If the Permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the MVAC, the Permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include air-tight sealed refrigeration systems used for refrigerated cargo, or air conditioning systems on passenger buses using HCFC-22 refrigerant.

7.12 Revocation of Existing Permits and Amendments

The following Air Quality Permits, Amendments, and 502(b)10 are subsumed by this permit and are hereby revoked:

| Air Quality Permit and Amendment Number(s) | Dates of Original Permit or Amendment Issuance | | |
|--|--|--|--|
| 2631-127-0003-V-06-0 | January 1, 2016 | | |
| 2631-127-0003-V-06-1 | September 30, 2016 | | |
| 2631-127-0003-V-06-2 | February 2, 2017 | | |
| 2631-127-0003-V-06-3 | May 1, 2019 | | |
| 2631-127-0003-V-06-4 | October 7, 2021 | | |
| 2631-127-0003-V-06-5 | May 6, 2022 | | |

7.13 Pollution Prevention

Not Applicable

7.14 Specific Conditions

Not Applicable

PART 8.0 GENERAL PROVISIONS

8.1 Terms and References

- 8.1.1 Terms not otherwise defined in the Permit shall have the meaning assigned to such terms in the referenced regulation.
- 8.1.2 Where more than one condition in this Permit applies to an emission unit and/or the entire facility, each condition shall apply and the most stringent condition shall take precedence. [391-3-1-.02(2)(a)2]

8.2 EPA Authorities

- 8.2.1 Except as identified as "State-only enforceable" requirements in this Permit, all terms and conditions contained herein shall be enforceable by the EPA and citizens under the Clean Air Act, as amended, 42 U.S.C. 7401, et seq.
 [40 CFR 70.6(b)(1)]
- 8.2.2 Nothing in this Permit shall alter or affect the authority of the EPA to obtain information pursuant to 42 U.S.C. 7414, "Inspections, Monitoring, and Entry."
 [40 CFR 70.6(f)(3)(iv)]
- 8.2.3 Nothing in this Permit shall alter or affect the authority of the EPA to impose emergency orders pursuant to 42 U.S.C. 7603, "Emergency Powers."
 [40 CFR 70.6(f)(3)(i)]

8.3 Duty to Comply

- 8.3.1 The Permittee shall comply with all conditions of this operating Permit. Any Permit noncompliance constitutes a violation of the Federal Clean Air Act and the Georgia Air Quality Act and/or State rules and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit renewal application. Any noncompliance with a Permit condition specifically designated as enforceable only by the State constitutes a violation of the Georgia Air Quality Act and/or State rules only and is grounds for enforcement action; for Permit termination, revocation and reissuance, or modification; for Permit termination, revocation and reissuance, or modification; or for denial of a Permit termination, revocation and reissuance, or modification; or for denial of a Permit termination, revocation and reissuance, or modification; or for denial of a Permit termination. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(i)]
- 8.3.2 The Permittee shall not use as a defense in an enforcement action the contention that it would have been necessary to halt or reduce the Permitted activity in order to maintain compliance with the conditions of this Permit.
 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(ii)]
- 8.3.3 Nothing in this Permit shall alter or affect the liability of the Permittee for any violation of applicable requirements prior to or at the time of Permit issuance.
 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(f)(3)(ii)]

8.3.4 Issuance of this Permit does not relieve the Permittee from the responsibility of obtaining any other permits, licenses, or approvals required by the Director or any other federal, state, or local agency.
 [391-3-1-.03(10)(e)1(iv) and 40 CFR 70.7(a)(6)]

8.4 Fee Assessment and Payment

8.4.1 The Permittee shall calculate and pay an annual Permit fee to the Division. The amount of fee shall be determined each year in accordance with the "Procedures for Calculating Air Permit Fees."
 [391-3-1-.03(9)]

8.5 Permit Renewal and Expiration

- 8.5.1 This Permit shall remain in effect for five (5) years from the issuance date. The Permit shall become null and void after the expiration date unless a timely and complete renewal application has been submitted to the Division at least six (6) months, but no more than eighteen (18) months prior to the expiration date of the Permit. [391-3-1-.03(10)(d)1(i), (e)2, and (e)3(ii) and 40 CFR 70.5(a)(1)(iii)]
- 8.5.2 Permits being renewed are subject to the same procedural requirements, including those for public participation and affected State and EPA review, that apply to initial Permit issuance.
 [391-3-1-.03(10)(e)3(i)]
- 8.5.3 Notwithstanding the provisions in 8.5.1 above, if the Division has received a timely and complete application for renewal, deemed it administratively complete, and failed to reissue the Permit for reasons other than cause, authorization to operate shall continue beyond the expiration date to the point of Permit modification, reissuance, or revocation. [391-3-1-.03(10)(e)3(iii)]

8.6 Transfer of Ownership or Operation

8.6.1 This Permit is not transferable by the Permittee. Future owners and operators shall obtain a new Permit from the Director. The new Permit may be processed as an administrative amendment if no other change in this Permit is necessary, and provided that a written agreement containing a specific date for transfer of Permit responsibility coverage and liability between the current and new Permittee has been submitted to the Division at least thirty (30) days in advance of the transfer. [391-3-1-.03(4)]

8.7 Property Rights

8.7.1 This Permit shall not convey property rights of any sort, or any exclusive privileges. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iv)]

8.8 Submissions

8.8.1 Reports, test data, monitoring data, notifications, annual certifications, and requests for revision and renewal shall be submitted to:

Georgia Department of Natural Resources Environmental Protection Division Air Protection Branch Atlanta Tradeport, Suite 120 4244 International Parkway Atlanta, Georgia 30354-3908

8.8.2 Any records, compliance certifications, and monitoring data required by the provisions in this Permit to be submitted to the EPA shall be sent to:

Air and Radiation Division Air Planning and Implementation Branch U. S. EPA Region 4 Sam Nunn Atlanta Federal Center 61 Forsyth Street, SW Atlanta, Georgia 30303-3104

- 8.8.3 Any application form, report, or compliance certification submitted pursuant to this Permit shall contain a certification by a responsible official of its truth, accuracy, and completeness. 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. [391-3-1-.03(10)(c)2, 40 CFR 70.5(d) and 40 CFR 70.6(c)(1)]
- 8.8.4 Unless otherwise specified, all submissions under this permit shall be submitted to the Division only.

8.9 Duty to Provide Information

- 8.9.1 The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the Permit application, shall promptly submit such supplementary facts or corrected information to the Division. [391-3-1-.03(10)(c)5]
- 8.9.2 The Permittee shall furnish to the Division, in writing, information that the Division may request 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 Division copies of records that the Permittee is required to keep by this Permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the EPA, if necessary, along with a claim of confidentiality. [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(v)]

8.10 Modifications

8.10.1 Prior to any source commencing a modification as defined in 391-3-1-.01(pp) that may result in air pollution and not exempted by 391-3-1-.03(6), the Permittee shall submit a Permit application to the Division. The application shall be submitted sufficiently in advance of any critical date involved to allow adequate time for review, discussion, or revision of plans, if necessary. Such application shall include, but not be limited to, information describing the precise nature of the change, modifications to any emission control system, production capacity of the plant before and after the change, and the anticipated completion date of the change. The application shall be in the form of a Georgia air quality Permit application to construct or modify (otherwise known as a SIP application) and shall be submitted on forms supplied by the Division, unless otherwise notified by the Division.

[391-3-1-.03(1) through (8)]

8.11 Permit Revision, Revocation, Reopening and Termination

- 8.11.1 This Permit may be revised, revoked, reopened and reissued, or terminated for cause by the Director. The Permit will be reopened for cause and revised accordingly under the following circumstances: [391-3-1-.03(10)(d)1(i)]
 - a. If additional applicable requirements become applicable to the source and the remaining Permit term is three (3) or more years. In this case, the reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. A reopening shall not be required if the effective date of the requirement is later than the date on which the Permit is due to expire, unless the original permit or any of its terms and conditions has been extended under Condition 8.5.3;

[391-3-1-.03(10)(e)6(i)(I)]

- b. If any additional applicable requirements of the Acid Rain Program become applicable to the source;
 [391-3-1-.03(10)(e)6(i)(II)] (Acid Rain sources only)
- c. The Director determines that the Permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Permit; or [391-3-1-.03(10)(e)6(i)(III) and 40 CFR 70.7(f)(1)(iii)]
- d. The Director determines that the Permit must be revised or revoked to assure compliance with the applicable requirements.
 [391-3-1-.03(10)(e)6(i)(IV) and 40 CFR 70.7(f)(1)(iv)]
- 8.11.2 Proceedings to reopen and reissue a Permit shall follow the same procedures as applicable to initial Permit issuance and shall affect only those parts of the Permit for which cause to reopen exists. Reopenings shall be made as expeditiously as practicable.
 [391-3-1-.03(10)(e)6(ii)]

8.11.3 Reopenings shall not be initiated before a notice of intent to reopen is provided to the source by the Director at least thirty (30) days in advance of the date the Permit is to be reopened, except that the Director may provide a shorter time period in the case of an emergency.

[391-3-1-.03(10)(e)6(iii)]

- 8.11.4 All Permit conditions remain in effect until such time as the Director takes final action. The filing of a request by the Permittee for any Permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, shall not stay any Permit condition.
 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(6)(iii)]
- 8.11.5 A Permit revision shall not be required for changes that are explicitly authorized by the conditions of this Permit.
- 8.11.6 A Permit revision shall not be required for changes that are part of an approved economic incentive, marketable Permit, emission trading, or other similar program or process for change which is specifically provided for in this Permit.
 [391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(8)]

8.12 Severability

8.12.1 Any condition or portion of this Permit which is challenged, becomes suspended or is ruled invalid as a result of any legal or other action shall not invalidate any other portion or condition of this Permit.
[391-3-1-.03(10)(d)1(i) and 40 CFR 70.6(a)(5)]

8.13 Excess Emissions Due to an Emergency

- 8.13.1 An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(1)]
- 8.13.2 An emergency shall constitute an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the Permittee demonstrates, through properly signed contemporaneous operating logs or other relevant evidence, that: [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(2) and (3)]

[591-5-1-.05(10)(0) and 40 CFK (0.0(g)(2) and (5)]

- a. An emergency occurred and the Permittee can identify the cause(s) of the emergency;
- b. The Permitted facility was at the time of the emergency being properly operated;

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in the Permit; and
- d. The Permittee promptly notified the Division and submitted written notice of the emergency to the Division within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 8.13.3 In an enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency shall have the burden of proof.
 [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(4)]
- 8.13.4 The emergency conditions listed above are in addition to any emergency or upset provisions contained in any applicable requirement. [391-3-1-.03(10)(d)7 and 40 CFR 70.6(g)(5)]

8.14 Compliance Requirements

8.14.1 Compliance Certification

The Permittee shall provide written certification to the Division and to the EPA, at least annually, of compliance with the conditions of this Permit. The annual written certification shall be postmarked no later than February 28 of each year and shall be submitted to the Division and to the EPA. The certification shall include, but not be limited to, the following elements:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(5)]

- a. The identification of each term or condition of the Permit that is the basis of the certification;
- b. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent, based on the method or means designated in paragraph c below. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
- c. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period;
- d. Any other information that must be included to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

- e. Any additional requirements specified by the Division.
- 8.14.2 Inspection and Entry
 - a. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the Division to perform the following:

[391-3-1-.03(10)(d)3 and 40 CFR 70.6(c)(2)]

- i. Enter upon the Permittee's premises where a Part 70 source is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this Permit; and
- iv. Sample or monitor any substances or parameters at any location during operating hours for the purpose of assuring Permit compliance or compliance with applicable requirements as authorized by the Georgia Air Quality Act.
- No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for Permit revocation and assessment of civil penalties.
 [391-3-1-.07 and 40 CFR 70.11(a)(3)(i)]
- 8.14.3 Schedule of Compliance
 - a. For applicable requirements with which the Permittee is in compliance, the Permittee shall continue to comply with those requirements.
 [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(A)]
 - b. For applicable requirements that become effective during the Permit term, the Permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.
 [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(B)]
 - c. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of Permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.
 [391-3-1-.03(10)(c)2 and 40 CFR 70.5(c)(8)(iii)(C)]

8.14.4 Excess Emissions

a. Excess emissions resulting from startup, shutdown, or malfunction of any source which occur though ordinary diligence is employed shall be allowed provided that: [391-3-1-.02(2)(a)7(i)]

- i. The best operational practices to minimize emissions are adhered to;
- ii. All associated air pollution control equipment is operated in a manner consistent with good air pollution control practice for minimizing emissions; and
- iii. The duration of excess emissions is minimized.
- b. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown or malfunction are prohibited and are violations of Chapter 391-3-1 of the Georgia Rules for Air Quality Control. [391-3-1-.02(2)(a)7(ii)]
- c. The provisions of this condition and Georgia Rule 391-3-1-.02(2)(a)7 shall apply only to those sources which are not subject to any requirement under Georgia Rule 391-3-1-.02(8) New Source Performance Standards or any requirement of 40 CFR, Part 60, as amended concerning New Source Performance Standards.
 [391-3-1-.02(2)(a)7(iii)]

8.15 Circumvention

State Only Enforceable Condition.

8.15.1 The Permittee shall not build, erect, install, or use any article, machine, equipment or process the use of which conceals an emission which would otherwise constitute a violation of an applicable emission standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of the pollutants in the gases discharged into the atmosphere.

[391-3-1-.03(2)(c)]

8.16 Permit Shield

- 8.16.1 Compliance with the terms of this Permit shall be deemed compliance with all applicable requirements as of the date of Permit issuance provided that all applicable requirements are included and specifically identified in the Permit.
 [391-3-1-.03(10)(d)6]
- 8.16.2 Any Permit condition identified as "State only enforceable" does not have a Permit shield.

8.17 Operational Practices

8.17.1 At all times, including periods of startup, shutdown, and malfunction, the Permittee shall maintain and operate the source, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on any information available to the Division that may include, but is not limited to, monitoring results, observations of the opacity or other characteristics of

emissions, review of operating and maintenance procedures or records, and inspection or surveillance of the source. [391-3-1-.02(2)(a)10]

State Only Enforceable Condition.

8.17.2 No person owning, leasing, or controlling, the operation of any air contaminant sources shall willfully, negligently or through failure to provide necessary equipment or facilities or to take necessary precautions, cause, permit, or allow the emission from said air contamination source or sources, of such quantities of air contaminants as will cause, or tend to cause, by themselves, or in conjunction with other air contaminants, a condition of air pollution in quantities or characteristics or of a duration which is injurious or which unreasonably interferes with the enjoyment of life or use of property in such area of the State as is affected thereby. Complying with Georgia's Rules for Air Quality Control Chapter 391-3-1 and Conditions in this Permit, shall in no way exempt a person from this provision.

[391-3-1-.02(2)(a)1]

8.18 Visible Emissions

8.18.1 Except as may be provided in other provisions of this Permit, the Permittee shall not cause, let, suffer, permit or allow emissions from any air contaminant source the opacity of which is equal to or greater than forty (40) percent.
 [391-3-1-.02(2)(b)1]

8.19 Fuel-burning Equipment

- 8.19.1 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, in operation or under construction on or before January 1, 1972 in amounts equal to or exceeding 0.7 pounds per million BTU heat input. [391-3-1-.02(2)(d)]
- 8.19.2 The Permittee shall not cause, let, suffer, permit, or allow the emission of fly ash and/or other particulate matter from any fuel-burning equipment with rated heat input capacity of less than 10 million Btu per hour, constructed after January 1, 1972 in amounts equal to or exceeding 0.5 pounds per million BTU heat input. [391-3-1-.02(2)(d)]
- 8.19.3 The Permittee shall not cause, let, suffer, permit, or allow the emission from any fuelburning equipment constructed or extensively modified after January 1, 1972, visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity. [391-3-1-.02(2)(d)]

8.20 Sulfur Dioxide

8.20.1 Except as may be specified in other provisions of this Permit, the Permittee shall not burn fuel containing more than 2.5 percent sulfur, by weight, in any fuel burning source that has a heat input capacity below 100 million Btu's per hour.[391-3-1-.02(2)(g)]

8.21 Particulate Emissions

- 8.21.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, let, permit, suffer, or allow the rate of emission from any source, particulate matter in total quantities equal to or exceeding the allowable rates shown below. Equipment in operation, or under construction contract, on or before July 2, 1968, shall be considered existing equipment. All other equipment put in operation or extensively altered after said date is to be considered new equipment.
 [391-3-1-.02(2)(e)]
 - a. The following equations shall be used to calculate the allowable rates of emission from new equipment:

 $E = 4.1P^{0.67}$; for process input weight rate up to and including 30 tons per hour. $E = 55P^{0.11} - 40$; for process input weight rate above 30 tons per hour.

b. The following equation shall be used to calculate the allowable rates of emission from existing equipment:

 $E = 4.1P^{0.67}$

In the above equations, E = emission rate in pounds per hour, and P = process input weight rate in tons per hour.

8.22 Fugitive Dust

[391-3-1-.02(2)(n)]

- 8.22.1 Except as may be specified in other provisions of this Permit, the Permittee shall take all reasonable precautions to prevent dust from any operation, process, handling, transportation or storage facility from becoming airborne. Reasonable precautions that could be taken to prevent dust from becoming airborne include, but are not limited to, the following:
 - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials, stockpiles, and other surfaces that can give rise to airborne dusts;

- c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods can be employed during sandblasting or other similar operations;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to give rise to airborne dusts; and
- e. The prompt removal of earth or other material from paved streets onto which earth or other material has been deposited.
- 8.22.2 The opacity from any fugitive dust source shall not equal or exceed 20 percent.

8.23 Solvent Metal Cleaning

- 8.23.1 Except as may be specified in other provisions of this Permit, the Permittee shall not cause, suffer, allow, or permit the operation of a cold cleaner degreaser subject to the requirements of Georgia Rule 391-3-1-.02(2)(ff) "Solvent Metal Cleaning" unless the following requirements for control of emissions of the volatile organic compounds are satisfied: [391-3-1-.02(2)(ff)1]
 - a. The degreaser shall be equipped with a cover to prevent escape of VOC during periods of non-use,
 - b. The degreaser shall be equipped with a device to drain cleaned parts before removal from the unit,
 - c. If the solvent volatility is 0.60 psi or greater measured at 100 °F, or if the solvent is heated above 120 °F, then one of the following control devices must be used:
 - i. The degreaser shall be equipped with a freeboard that gives a freeboard ratio of 0.7 or greater, or
 - ii. The degreaser shall be equipped with a water cover (solvent must be insoluble in and heavier than water), or
 - iii. The degreaser shall be equipped with a system of equivalent control, including but not limited to, a refrigerated chiller or carbon adsorption system.
 - d. Any solvent spray utilized by the degreaser must be in the form of a solid, fluid stream (not a fine, atomized or shower type spray) and at a pressure which will not cause excessive splashing, and
 - e. All waste solvent from the degreaser shall be stored in covered containers and shall not be disposed of by such a method as to allow excessive evaporation into the atmosphere.

8.24 Incinerators

- 8.24.1 Except as specified in the section dealing with conical burners, no person shall cause, let, suffer, permit, or allow the emissions of fly ash and/or other particulate matter from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", in amounts equal to or exceeding the following: [391-3-1-.02(2)(c)1-4]
 - a. Units with charging rates of 500 pounds per hour or less of combustible waste, including water, shall not emit fly ash and/or particulate matter in quantities exceeding 1.0 pound per hour.
 - b. Units with charging rates in excess of 500 pounds per hour of combustible waste, including water, shall not emit fly ash and/or particulate matter in excess of 0.20 pounds per 100 pounds of charge.
- 8.24.2 No person shall cause, let, suffer, permit, or allow from any incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators", visible emissions the opacity of which is equal to or greater than twenty (20) percent except for one six minute period per hour of not more than twenty-seven (27) percent opacity.
- 8.24.3 No person shall cause or allow particles to be emitted from an incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" which are individually large enough to be visible to the unaided eye.
- 8.24.4 No person shall operate an existing incinerator subject to the requirements of Georgia Rule 391-3-1-.02(2)(c) "Incinerators" unless:
 - a. It is a multiple chamber incinerator;
 - b. It is equipped with an auxiliary burner in the primary chamber for the purpose of creating a pre-ignition temperature of 800°F; and
 - c. It has a secondary burner to control smoke and/or odors and maintain a temperature of at least 1500°F in the secondary chamber.

8.25 Volatile Organic Liquid Handling and Storage

8.25.1 The Permittee shall ensure that each storage tank subject to the requirements of Georgia Rule 391-3-1-.02(2)(vv) "Volatile Organic Liquid Handling and Storage" is equipped with submerged fill pipes. For the purposes of this condition and the permit, a submerged fill pipe is defined as any fill pipe with a discharge opening which is within six inches of the tank bottom.
[391-3-1-.02(2)(vv)(1)]

8.26 Use of Any Credible Evidence or Information

8.26.1 Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit, for the purpose of submission of compliance certifications or establishing whether or not a person has violated or is in violation of any emissions limitation or standard, nothing in this permit or any Emission Limitation or Standard to which it pertains, shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [391-3-1-.02(3)(a)]

8.27 Internal Combustion Engines

8.27.1 For diesel-fired internal combustion engine(s) manufactured after April 1, 2006 or modified/reconstructed after July 11, 2005, the Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines." Such requirements include but are not limited to:

[40 CFR 60.4200]

- Equip all emergency generator engines with non-resettable hour meters in accordance a. with Subpart IIII.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart IIII.
- Conduct engine maintenance prescribed by the engine manufacturer in accordance c. with Subpart IIII.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart IIII. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- Maintain any records in accordance with Subpart IIII e.
- f. Maintain a list of engines subject to 40 CFR 60 Subpart IIII, including the date of manufacture.[391-3-1-.02(6)(b)]
- 8.27.2 The Permittee shall comply with all applicable provisions of New Source Performance Standards (NSPS) as found in 40 CFR 60 Subpart A - "General Provisions" and 40 CFR 60 Subpart JJJJ - "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines," for spark ignition internal combustion engines(s) (gasoline, natural gas, liquefied petroleum gas or propane-fired) manufactured after July 1, 2007 or modified/reconstructed after June 12, 2006. [40 CFR 60.4230]

8.27.3 The Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) as found in 40 CFR 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart ZZZZ - "National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines."

For diesel-fired emergency generator engines defined as "existing" in 40 CFR 63 Subpart ZZZZ (constructed prior to June 12, 2006 for area sources of HAP, constructed prior to June 12, 2006 for \leq 500hp engines at major sources, and constructed prior to December 19, 2002 for >500hp engines at major sources of HAP), such requirements (if applicable) include but are not limited to: [40 CFR 63.6580]

- a. Equip all emergency generator engines with non-resettable hour meters in accordance with Subpart ZZZZ.
- b. Purchase only diesel fuel with a maximum sulfur content of 15 ppm unless otherwise specified by the Division in accordance with Subpart ZZZZ.
- c. Conduct the following in accordance with Subpart ZZZZ.
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first
 - ii. Inspect air cleaner every 1000 hours of operation or annually, whichever comes first and replace as necessary
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first and replace as necessary.
- d. Limit non-emergency operation of each emergency generator to 100 hours per year in accordance with Subpart ZZZZ. Non-emergency operation other than maintenance and readiness testing is prohibited for engines qualifying as "emergency generators" for the purposes of Ga Rule 391-3-1-.02(2)(mmm).
- e. Maintain any records in accordance with Subpart ZZZZ
- f. Maintain a list of engines subject to 40 CFR 63 Subpart ZZZZ, including the date of manufacture.[391-3-1-.02(6)(b)]

8.28 Boilers and Process Heaters

8.28.1 If the facility/site is an area source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart JJJJJJ - "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers."
[40 CFR 63.11193]

8.28.2 If the facility/site is a major source of Hazardous Air Pollutants, the Permittee shall comply with all applicable provisions of National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart A - "General Provisions" and 40 CFR 63 Subpart DDDDD - "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters."
[40 CFR 63.7480]

Attachments

- A. List of Standard Abbreviations and List of Permit Specific Abbreviations
- B. Insignificant Activities Checklist, Insignificant Activities Based on Emission Levels and Generic Emission Groups
- C. List of References

ATTACHMENT A

List Of Standard Abbreviations

| AIRS | Aerometric Information Retrieval System | | |
|------------------------|---|--|--|
| APCD | Air Pollution Control Device | | |
| | | | |
| ASTM | American Society for Testing and Materials | | |
| BACT | Best Available Control Technology | | |
| BTU | British Thermal Unit | | |
| CAAA | Clean Air Act Amendments | | |
| CEMS | Continuous Emission Monitoring System | | |
| CERMS | Continuous Emission Rate Monitoring System | | |
| CFR | Code of Federal Regulations | | |
| CMS | Continuous Monitoring System(s) | | |
| CO | Carbon Monoxide | | |
| COMS | Continuous Opacity Monitoring System | | |
| dscf/dscm | Dry Standard Cubic Foot / Dry Standard Cubic | | |
| | Meter | | |
| EPA | United States Environmental Protection Agency | | |
| EPCRA | Emergency Planning and Community Right to | | |
| | Know Act | | |
| gr | Grain(s) | | |
| GPM (gpm) | Gallons per minute | | |
| H ₂ O (H2O) | Water | | |
| HAP | Hazardous Air Pollutant | | |
| HCFC | Hydro-chloro-fluorocarbon | | |
| MACT | Maximum Achievable Control Technology | | |
| MMBtu | Million British Thermal Units | | |
| MMBtu/hr | Million British Thermal Units per hour | | |
| MVAC | Motor Vehicle Air Conditioner | | |
| MW | Megawatt | | |
| NESHAP | National Emission Standards for Hazardous Air | | |
| | Pollutants | | |
| NO _x (NOx) | Nitrogen Oxides | | |
| NSPS | New Source Performance Standards | | |
| OCGA | Official Code of Georgia Annotated | | |

| DM | | | | | |
|-------------|--|--|--|--|--|
| PM | Particulate Matter | | | | |
| PM_{10} | Particulate Matter less than 10 micrometers in | | | | |
| (PM10) | diameter | | | | |
| PPM (ppm) | Parts per Million | | | | |
| PSD | Prevention of Significant Deterioration | | | | |
| RACT | Reasonably Available Control Technology | | | | |
| RMP | Risk Management Plan | | | | |
| SIC | Standard Industrial Classification | | | | |
| SIP | State Implementation Plan | | | | |
| $SO_2(SO2)$ | Sulfur Dioxide | | | | |
| USC | United States Code | | | | |
| VE | Visible Emissions | | | | |
| VOC | Volatile Organic Compound | | | | |
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List of Permit Specific Abbreviations

| ESP | Electrostatic Precipitator |
|-----------------|---------------------------------|
| HVLC | High-Volume, Low-Concentration |
| kg | Kilogram |
| lb | Pound |
| LVHC | Low-Volume, High-Concentration |
| NCG | Non-Condensable Gases |
| UODTP | Unbleached Oven-Dried Tons Pulp |
| ADTP | Air-Dried Tons Pulp |
| CaO | Calcium Oxide |
| H_2S (H2S) | Hydrogen Sulfide |
| Cl ₂ | Chlorine |

| ODP | Oven-Dried Pulp |
|------------------|-----------------------------------|
| psig | Pounds per Square Inch (pressure) |
| SAM | Sulfuric Acid Mist |
| SOG | Stripper Off-Gases |
| S/S/M, SSM | Startup, Shutdown, Malfunction |
| TRS | Total Reduced Sulfur |
| BLS | Black Liquor Solids |
| mmscf | Million Standard Cubic Feet |
| g | Gram |
| ClO ₂ | Chlorine Dioxide |
| TDF | Tire Derived Fuel |

ATTACHMENT B

NOTE: Attachment B contains information regarding insignificant emission units/activities and groups of generic emission units/activities in existence at the facility at the time of Permit issuance. Future modifications or additions of insignificant emission units/activities and equipment that are part of generic emissions groups may not necessarily cause this attachment to be updated.

| Category | Description of Insignificant Activity/Unit | | | |
|------------------|---|----|--|--|
| Mobile Sources | 1. Cleaning and sweeping of streets and paved surfaces | | | |
| Combustion | 1. Fire fighting and similar safety equipment used to train fire fighters or other emergency | 2 | | |
| Equipment | personnel. | | | |
| | 2. Small incinerators that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act and are not considered a "designated | | | |
| | facility" as specified in 40 CFR 60.32e of the Federal emissions guidelines for | | | |
| | Hospital/Medical/Infectious Waste Incinerators, that are operating as follows: | | | |
| | hospital medical medical waste memorators, and are operating as follows. | | | |
| | i) Less than 8 million BTU/hr heat input, firing types 0, 1, 2, and/or 3 waste. | | | |
| | ii) Less than 8 million BTU/hr heat input with no more than 10% pathological (type 4) waste | | | |
| | by weight combined with types 0, 1, 2, and/or 3 waste. | | | |
| | iii) Less than 4 million BTU/hr heat input firing type 4 waste. | | | |
| | (Refer to 391-3-103(10)(g)2.(ii) for descriptions of waste types) | | | |
| | 3. Open burning in compliance with Georgia Rule 391-3-102 (5). | 1 | | |
| | 4. Stationary engines burning: | | | |
| | i) Natural gas, LPG, gasoline, dual fuel, or diesel fuel which are used exclusively as | | | |
| | emergency generators shall not exceed 500 hours per year or 200 hours per year if subject | 5 | | |
| | to Georgia Rule 391-3-102(2)(mmm).7 | | | |
| | ii) Natural gas, LPG, and/or diesel fueled generators used for emergency, peaking, and/or | | | |
| | standby power generation, where the combined peaking and standby power generation do | | | |
| | not exceed 200 hours per year. | | | |
| | iii) Natural gas, LPG, and/or diesel fuel used for other purposes, provided that the output of | | | |
| | each engine does not exceed 400 horsepower and that no individual engine operates for | | | |
| | more than 2,000 hours per year. | | | |
| | iv) Gasoline used for other purposes, provided that the output of each engine does not exceed 100 horsepower and that no individual engine operates for more than 500 hours per year. | | | |
| Trade Operations | 1. Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and | | | |
| | construction activities whose emissions of hazardous air pollutants (HAPs) fall below 1,000 | 30 | | |
| | pounds per year. | | | |
| Maintenance, | 1. Blast-cleaning equipment using a suspension of abrasive in water and any exhaust system (or | | | |
| Cleaning, and | collector) serving them exclusively. | | | |
| Housekeeping | 2. Portable blast-cleaning equipment. | | | |
| | | | | |
| | 3. Non-Perchloroethylene Dry-cleaning equipment with a capacity of 100 pounds per hour or less of clothes. | | | |
| | 4. Cold cleaners having an air/vapor interface of not more than 10 square feet and that do not use a halogenated solvent. | | | |
| | 5. Non-routine clean out of tanks and equipment for the purposes of worker entry or in preparation | | | |
| | for maintenance or decommissioning. | | | |
| | 6. Devices used exclusively for cleaning metal parts or surfaces by burning off residual amounts of | | | |
| | paint, varnish, or other foreign material, provided that such devices are equipped with afterburners. | | | |
| | 7. Cleaning operations: Alkaline phosphate cleaners and associated cleaners and burners. | | | |
| | . Country sportations, rinkamic prospirate cleaners and associated cleaners and bufflets. | | | |

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | Quantity |
|-----------------------------|--|----------|
| Laboratories and Testing | 1. Laboratory fume hoods and vents associated with bench-scale laboratory equipment used for physical or chemical analysis. | 15 |
| - | Research and development facilities, quality control testing facilities and/or small pilot projects, where combined daily emissions from all operations are not individually major or are support facilities not making significant contributions to the product of a collocated major manufacturing facility. | |
| Pollution Control | 1. Sanitary waste water collection and treatment systems, except incineration equipment or equipment subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | 1 |
| | 2. On site soil or groundwater decontamination units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 3. Bioremediation operations units that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | |
| | 4. Landfills that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | 5 |
| Industrial Operations | 1. Concrete block and brick plants, concrete products plants, and ready mix concrete plants producing less than 125,000 tons per year. | |
| | 2. Any of the following processes or process equipment which are electrically heated or which fire natural gas, LPG or distillate fuel oil at a maximum total heat input rate of not more than 5 million BTU's per hour: i) Furnaces for heat treating glass or metals, the use of which do not involve molten materials or oil- | |
| | ii) Porcelain enameling furnaces or porcelain enameling drying ovens. | |
| | iii) Kilns for firing ceramic ware. iv) Crucible furnaces, pot furnaces, or induction melting and holding furnaces with a capacity of 1,000 pounds or less each, in which sweating or distilling is not conducted and in which fluxing is not conducted utilizing free chlorine, chloride or fluoride derivatives, or ammonium compounds. v) Bakery ovens and confection cookers. | |
| | vi) Feed mill ovens.vii) Surface coating drying ovens | |
| | 3. Carving, cutting, routing, turning, drilling, machining, sawing, surface grinding, sanding, planing, buffing, shot blasting, shot peening, or polishing; ceramics, glass, leather, metals, plastics, rubber, concrete, paper stock or wood, also including roll grinding and ground wood pulping stone sharpening, provided that: i) Activity is performed indoors; & ii) No significant fugitive particulate emissions enter the environment; & iii) No visible emissions enter the outdoor atmosphere. | 10 |
| | 4. Photographic process equipment by which an image is reproduced upon material sensitized to radiant energy (e.g., blueprint activity, photographic developing and microfiche). | |
| | Grain, food, or mineral extrusion processes Equipment used exclusively for sintering of glass or metals, but not including equipment used for sintering metal-bearing ores, metal scale, clay, fly ash, or metal compounds. | |
| | 7. Equipment for the mining and screening of uncrushed native sand and gravel. | |
| | 8. Ozonization process or process equipment. | |
| | 9. Electrostatic powder coating booths with an appropriately designed and operated particulate control system. 10. A division of the distribution of the distredistrule of the distribution of the distribution of the distr | |
| | 10. Activities involving the application of hot melt adhesives where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. 11. Equipment used exclusively for the mixing and blending water-based adhesives and coatings at ambient | |
| | temperatures. 12. Equipment used for compression, molding and injection of plastics where VOC emissions are less than | |
| | 5 tons per year and HAP emissions are less than 1,000 pounds per year. 13. Ultraviolet curing processes where VOC emissions are less than 5 tons per year and HAP emissions are less than 1,000 pounds per year. | |

INSIGNIFICANT ACTIVITIES CHECKLIST

| Category | Description of Insignificant Activity/Unit | | | |
|--------------------------------|--|-----|--|--|
| Storage Tanks and Equipment | 1. All petroleum liquid storage tanks storing a liquid with a true vapor pressure of equal to or less than 0.50 psia as stored. | 5 | | |
| | All petroleum liquid storage tanks with a capacity of less than 40,000 gallons storing a liquid with a true vapor pressure of equal to or less than 2.0 psia as stored that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | | | |
| | 3. All petroleum liquid storage tanks with a capacity of less than 10,000 gallons storing a petroleum liquid. | | | |
| | 4. All pressurized vessels designed to operate in excess of 30 psig storing petroleum fuels that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | | | |
| | 5. Gasoline storage and handling equipment at loading facilities handling less than 20,000 gallons per day or at vehicle dispensing facilities that are not subject to any standard, limitation or other requirement under Section 111 or 112 (excluding 112(r)) of the Federal Act. | 1 | | |
| | Portable drums, barrels, and totes provided that the volume of each container does not exceed 550 gallons. | 800 | | |
| | 7. All chemical storage tanks used to store a chemical with a true vapor pressure of less than or equal to 10 millimeters of mercury (0.19 psia). | 16 | | |

INSIGNIFICANT ACTIVITIES BASED ON EMISSION LEVELS

| Description of Emission Units / Activities | Quantity |
|---|----------|
| Causticizing Area | |
| (L500) East Green Liquor Storage Tank | 1 |
| (L501) Green Liquor Storage Tank | 1 |
| (L503) Dregs Storage Tank | 1 |
| (L504) Dregs Vacuum Receiver | 1 |
| (L505) Dregs Filter | 1 |
| (L506) Dregs Filter Mix Tank | 1 |
| (L507) Green Liquor Clarifier – North | 1 |
| (L509) Green Liquor Clarifier – South | 1 |
| (L519) White Liquor Clarifier – North | 1 |
| (L521) White Liquor Clarifier – South | 1 |
| (L523) White Liquor Storage Tank – North | 1 |
| (L524) White Liquor Storage Tank – South | 1 |
| (L525) Lime Mud Washer – North | 1 |
| (L526) Lime Mud Washer – South | 1 |
| (L531) Mud Storage Tank | 1 |
| (L533) Precoat Filter Vacuum Pump Exhaust – West | 1 |
| (L534) Precoat Filter Vacuum Pump Exhaust – East | 1 |
| (L535) Prewash Filter Vacuum Pump Exhaust – West | 1 |
| (L536) Prewash Filter Vacuum Pump Exhaust – East | 1 |
| (L542) Mud Filter – North | 1 |
| (L543) Mud Filter – South | 1 |
| (L546) Lime Mud Filter Feed Tank | 1 |
| (L547) Lime Mud Washer Filtrate Tank | 1 |
| (L548) Lime Mud Reclaim Tank | 1 |

| (L549) White Liquor Storage Tank – West | 1 |
|---|---|
| (L550) White Liquor Storage Tank – East | 1 |
| (L551) Dregs Filter Feed Tank | 1 |
| Papermaking Area | |
| (M95) No. 4 Paper Machine Slitter | 1 |
| Miscellaneous Sources | |
| (CT01) No. 6 Evaporator Cooling Tower | 1 |
| (CT02) No. 5 Evaporator Cooling Tower | 1 |
| (CT03) Pre-Evaporator Cooling Tower | 1 |
| (CT04) No. 4 Bleach Plant Cooling Tower | 1 |
| (U704) Ash Transfer Cyclone | 1 |

ATTACHMENT B (continued)

GENERIC EMISSION GROUPS

Emission units/activities appearing in the following table are subject only to one or more of Georgia Rules 391-3-1-.02 (2) (b), (e) &/or (n). Potential emissions of particulate matter, from these sources based on TSP, are less than 25 tons per year per process line or unit in each group. Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

| | Number | Applicable Rules | | |
|---|------------------------------|---------------------|------------------------------------|---------------------------|
| Description of Emissions Units / Activities | of Units (if appropriate) | Opacity Rule (b) | PM from Mfg Process Rule (e) | Fugitive Dust Rule (n) |
| Woodyard Operations (WY01) | 10 | | | Yes |

The following table includes groups of fuel burning equipment subject only to Georgia Rules 391-3-1-.02 (2) (b) & (d). Any emissions unit subject to a NESHAP, NSPS, or any specific Air Quality Permit Condition(s) are not included in this table.

| Description of Fuel Burning Equipment | Number of Units |
|--|-----------------|
| Fuel burning equipment with a rated heat input capacity of less than 10 million BTU/hr burning only natural gas and/or LPG. | 0 |
| Fuel burning equipment with a rated heat input capacity of less than 5 million BTU/hr, burning only distillate fuel oil, natural gas and/or LPG. | 0 |
| Any fuel burning equipment with a rated heat input capacity of 1 million BTU/hr or less. | 0 |

ATTACHMENT C

LIST OF REFERENCES

- 1. The Georgia Rules for Air Quality Control Chapter 391-3-1. All Rules cited herein which begin with 391-3-1 are State Air Quality Rules.
- 2. Title 40 of the Code of Federal Regulations; specifically 40 CFR Parts 50, 51, 52, 60, 61, 63, 64, 68, 70, 72, 73, 75, 76 and 82. All rules cited with these parts are Federal Air Quality Rules.
- 3. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Testing and Monitoring Sources of Air Pollutants.
- 4. Georgia Department of Natural Resources, Environmental Protection Division, Air Protection Branch, Procedures for Calculating Air Permit Fees.
- 5. Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume I: Stationary Point and Area Sources. This information may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/ap42/index.html*.
- 6. The latest properly functioning version of EPA's **TANKS** emission estimation software. The software may be obtained from EPA's TTN web site at *www.epa.gov/ttn/chief/software/tanks/index.html*.
- 7. The Clean Air Act (42 U.S.C. 7401 et seq).
- 8. White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995 (White Paper #1).
- 9. White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program, March 5, 1996 (White Paper #2).