

**STATE OF MISSISSIPPI  
AIR POLLUTION CONTROL  
TITLE V PERMIT  
TO OPERATE AIR EMISSIONS EQUIPMENT  
THIS CERTIFIES THAT**

International Paper, Vicksburg Mill  
Highway 3 North  
Vicksburg, Mississippi  
Warren County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

**Permit Issued: January 7, 2011**

**Modified: SEP 28 2015**

**MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD**



**AUTHORIZED SIGNATURE**

**MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY**

**Expires: December 31, 2015**

**Permit No.: 2780-00015**

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**APPENDIX A LIST OF ABBREVIATIONS USED IN THIS PERMIT**

**APPENDIX B 40 CFR 63 Subpart S- National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

**APPENDIX C 40 CFR 63 Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills**

**APPENDIX D 40 CFR Part 64 – Compliance Assurance Monitoring**

## **SECTION 1. GENERAL CONDITIONS**

- 1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. (Ref.: APC-S-6, Section III.A.6.a.)
- 1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (Ref.: APC-S-6, Section III.A.6.b.)
- 1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: APC-S-6, Section III.A.6.c.)
- 1.4 This permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: APC-S-6, Section III.A.6.d.)
- 1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality. (Ref.: APC-S-6, Section III.A.6.e.)
- 1.6 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref.: APC-S-6, Section III.A.5.)
- 1.7 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation APC-S-6.
  - (a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions

measurements for the pollutant(s); mass balance calculations such as the amounts of the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgements where such judgements are derived from process and/or emission data which supports the estimates of maximum actual emission. (Ref.: APC-S-6, Section VI.A.2.)

- (a) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee. (Ref.: APC-S-6, Section VI.A.2.) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time. (Ref.: APC-S-6, Section VI.D.2.)
- (b) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due. (Ref.: APC-S-6, Section VI.D.)
- (c) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition. (Ref.: APC-S-6, Section VI.C.)

- 1.8 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (Ref.: APC-S-6, Section III.A.8.)
- 1.9 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (Ref.: APC-S-6, Section II.E.)
- 1.10 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:
- (a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - (b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. (Ref.: APC-S-6, Section III.C.2.)
- 1.11 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere. (Ref.: APC-S-1, Section 3.9(a))
- 1.12 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970. (Ref.: APC-S-1, Section 3.9(b))
- 1.13 Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source. (Ref.: APC-S-6, Section III.F.1.)
- 1.14 Nothing in this permit shall alter or affect the following:
- (a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

- (b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - (c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.
  - (d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act. (Ref.: APC-S-6, Section III.F.2.)
- 1.15 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan. (Ref.: APC-S-6, Section III.H.)
- 1.16 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application. (Ref.: APC-S-6, Section IV.C.2., Section IV.B., and Section II.A.1.c.)
- 1.17 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:
- (a) the changes are not modifications under any provision of Title I of the Act;
  - (b) the changes do not exceed the emissions allowable under this permit;
  - (c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:
    - (1) a brief description of the change(s),
    - (2) the date on which the change will occur,
    - (3) any change in emissions, and
    - (4) any permit term or condition that is no longer applicable as a result of the change;
  - (d) the permit shield shall not apply to any Section 502(b)(10) change. (Ref.: APC-S-6, Section IV.F.)

- 1.18 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in Regulation APC-S-3, "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared. (Ref.: APC-S-3)
- 1.19 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations APC-S-2, "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations APC-S-6, "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:
- (a) routine maintenance, repair, and replacement;
  - (b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan pursuant to the Federal Power Act;
  - (c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;
  - (d) use of an alternative fuel or raw material by a stationary source which:
    - (1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166; or
    - (2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51.166;
  - (e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or
  - (f) any change in ownership of the stationary source."

- 1.20 Any change in ownership or operational control must be approved by the Permit Board. (Ref.: APC-S-6, Section IV.D.4.)
- 1.21 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission. (Ref.: APC-S-6, Section III.B.1)
- 1.22 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet the following buffer zones.
- (a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.
  - (b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.
  - (c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator. (Ref.: APC-S-1, Section 3.7)
- 1.23 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies.
- (a) Except as otherwise specified herein, 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.
  - (b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.



- (c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
    - (1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
    - (2) the permitted facility was at the time being properly operated;
    - (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
    - (4) the permittee submitted notice of the emergency to the DEQ within 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.
  - (d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein. (Ref.: APC-S-6, Section III.G.)
- 1.24 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, shutdowns and maintenance.
- (a) Upsets (as defined by APC-S-1, Section 2.34)
    - (1) The occurrence of an upset constitutes an affirmative defense to an enforcement action brought for noncompliance with emission standards or other requirements of Applicable Rules and Regulations or any applicable permit if the permittee demonstrates through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:
      - (i) an upset occurred and that the permittee can identify the cause(s) of the upset;
      - (ii) the source was at the time being properly operated;
      - (iii) during the upset the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;

- (iv) the permittee submitted notice of the upset to the DEQ within 5 working days of the time the upset began; and
    - (v) the notice of the upset shall contain a description of the upset, any steps taken to mitigate emissions, and corrective actions taken.
  - (2) In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.
  - (3) This provision is in addition to any upset provision contained in any applicable requirement.
- (b) Startups and Shutdowns (as defined by APC-S-1, Sections 2.31 & 2.26)
- (1) Startups and shutdowns are part of normal source operation. Emissions limitations applicable to normal operation apply during startups and shutdowns except as follows:
    - (i) when sudden, unavoidable breakdowns occur during a startup or shutdown, the event may be classified as an upset subject to the requirements above;
    - (ii) when a startup or shutdown is infrequent, the duration of excess emissions is brief in each event, and the design of the source is such that the period of excess emissions cannot be avoided without causing damage to equipment or persons; or
    - (iii) when the emissions standards applicable during a startup or shutdown are defined by other requirements of Applicable Rules and Regulations or any applicable permit.
  - (2) In any enforcement proceeding, the permittee seeking to establish the applicability of any exception during a startup or shutdown has the burden of proof.
  - (3) In the event this startup and shutdown provision conflicts with another applicable requirement, the more stringent requirement shall apply.
- (c) Maintenance.
- (1) Maintenance should be performed during planned shutdown or repair of process equipment such that excess emissions are avoided. Unavoidable maintenance that results in brief periods of excess emissions and that is necessary to prevent or minimize emergency conditions or equipment malfunctions constitutes an

affirmative defense to an enforcement action brought for noncompliance with emission standards, or other regulatory requirements if the permittee can demonstrate the following:

- (i) the permittee can identify the need for the maintenance;
  - (ii) the source was at the time being properly operated;
  - (iii) during the maintenance the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements of Applicable Rules and Regulations or any applicable permit;
  - (iv) the permittee submitted notice of the maintenance to the DEQ within 5 working days of the time the maintenance began or such other times as allowed by DEQ; and
  - (v) the notice shall contain a description of the maintenance, any steps taken to mitigate emissions, and corrective actions taken.
- (2) In any enforcement proceeding, the permittee seeking to establish the applicability of this section has the burden of proof.
- (3) In the event this maintenance provision conflicts with another applicable requirement, the more stringent requirement shall apply. (Ref.: APC-S-1, Section 10)

- 1.25 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation APC-S-1, Section 8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

## SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Emissions from Paper Mill Area, including the Paper Machine and other related equipment.
AA-003	Emissions from the 300 tons CaCO <sub>3</sub> /day Lime Kiln permitted to burn natural gas, fuel oil, used oil, and petroleum coke, and equipped with Venturi scrubber for control of particulate matter. Kiln is primary control device for the destruction of LVHC gases and NCGs collected throughout the mill.
AA-005	Emissions from 990 MMBTU/hr (82.7 ton BLS/hr) Recovery Boiler permitted to burn black liquor solids, fuel oil, and natural gas, and equipped with an electrostatic precipitator for control of particulate matter.
AA-006	Emissions from 870 MMBTU/hr Power (Bark) Boiler with low NO <sub>x</sub> burners and overfire air permitted to burn wood waste, no. 6 fuel oil, natural gas, cottonseed, tire derived fuel, used oil, and soy bean seed. Equipped with a set cyclones followed by venturi scrubber for PM control. Boiler is primary control device for the destruction of HVLC gases and backup to the lime kiln (AA-003) for the destruction of LVHC gases and NCGs.
AA-007	Emissions from Smelt Dissolving Tank equipped with a scrubber for control of particulate matter.
AA-009	Emissions from Lime Slaker equipped with a scrubber for control of particulate matter.
AA-010	Emissions from Natural Gas Package Boiler No. 3, with a maximum capacity of 99 MMBTU/hr.
AA-011	Emissions from Natural Gas Package Boiler No. 4, with a maximum capacity of 99 MMBTU/hr.
AA-012	Purchased Chip Rechipper Cyclone.
AA-013	Sawdust Cyclone conveyed from the Purchased Chip Screens.
AA-014	No. 1 Manufactured Chip Rechipper Blowline Cyclone to No. 1 and No. 2 Chip Surge bins.
AA-015	No. 2 Manufactured Chip Rechipper Blowline Cyclone to No. 1 and No. 2 Chip Surge bins.
AA-016	Area Fugitive Emissions including all wood product handling (biomass). These include the debarking drum, screen rejects chipper, log chipper, no. 1&2 screen reject chipper, log chipper, storage and handling areas, and bark and chip piles.
AA-017	Pulp Mill (not captured by either the HVLC or LVHC systems) emissions

Emission Point	Description
AA-019	Emissions from Black Liquor System, including all the equipment in the black liquor process area that includes Black Liquor Oxidation Tank, liquor tanks, and tanks associated with the soap system.
AA-020	Emissions from Reausticizing Area that include green clarifier, (2) green liquor storage tanks, white liquor clarifier, (2) white liquor storage tanks, lime mud washing , and lime storage and handling.
AA-021	Crude Tall Oil Plant equipped with scrubber for control of total reduced sulfur compounds (TRS) and VOCs.
AA-033	Main Foul Condensate Collection Tank- LVHC emissions are incinerated in the Lime Kiln (AA-003) or the Power Boiler (AA-006), condensates routed to the Aerated Stabilization Basin (AA-036).
AA-034	Pine and Hardwood brown stock washers (6) and associated equipment that include (7) Service tanks, (1) Low density stock tank , (1) Waste stock tank, and HVLC system to convey HVLC gases to Power Boiler (AA-006). HVLC emissions are incinerated in the Power Boiler (AA-006). Closed-vent system under vacuum, any emissions accounted for in AA-006.
AA-036	Emissions from the wastewater treatment system that include VOCs and TRS from condensates collected in the LVHC.
AA-037	Emissions from Hardwood Digester and associated equipment that include blow tank and LVHC system to convey gasses to Lime Kiln (AA-003) or Power Boiler (AA-006) for incineration. Closed-vent system, any emissions accounted for in AA-003, or AA-006.
IA-001	Emissions from Pine Digester, and associated equipment that include (2) Pine blow tanks, turpentine recovery system and LVHC system to convey gasses to Lime Kiln (AA-003) or Power Boiler (AA-006) for incineration. Closed-vent system, any emissions accounted for in AA-003 or AA-006.
AA-038	Emissions from Multiple Effect Evaporator System that include LVHC system to convey gasses to Lime Kiln (AA-003) or Power Boiler (AA-006) for incineration. Closed-vent system, any emissions accounted for in AA-003 or AA-006.
AA-040	Emissions from DLK Fiber Reclaim System.
AA-041	Emissions from Petroleum Coke Silo baghouse.

## SECTION 3. EMISSION LIMITATIONS & STANDARDS

### A. Facility-Wide Emission Limitations & Standards

- 3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).
- (a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period. Emissions resulting from soot blowing
  - (b) operations shall be permitted provided such emissions do not exceed 60 percent opacity, and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour. (Ref.: APC-S-1, Section 3.1)
- 3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)

**B. Emission Point Specific Emission Limitations & Standards**

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/Parameter	Limit/Standard
Entire Facility	NESHAP, Subpart S, 40 CFR 63.440(a)	3.B.1	HAPs	All applicable requirements and limitations, and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart S, Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.
Entire Facility	NESHAP, Subpart MM, 40 CFR 63.860(a)	3.B.2	HAP Metals (As PM)	All applicable requirements and limitations, and any subsequent revisions of the NESHAP, Subpart MM, Standards for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
Entire Facility	NSPS, 40 CFR Part 60 Subpart BB	3.B.29	TRS, PM	All applicable requirements and limitations, and any subsequent revisions for NSPS Standards for Kraft Pulp Mills, 40 CFR Part 60 Subpart BB for NSPS
AA-003	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, and modified most recently September 2, 2008	3.B.3	PM	1 lb/ton of equivalent air dried pulp, not to exceed 64.2 lbs/hr or 281 TPY
			PM <sub>10</sub>	0.938 lb/ton of equivalent air dried pulp not to exceed 63.1 lbs/hr or 276 TPY
			SO <sub>2</sub>	0.3 lb/ton of equivalent air dried pulp not to exceed 19.3 lbs/hr or 84.3 TPY
			TRS	20 PPM (as H <sub>2</sub> S) dry gas basis corrected 10% oxygen on a 12-hour average.
			NO <sub>x</sub>	0.37 lbs/MMBTU not to exceed 29.6 lbs/hr or 130 TPY
			CO	1 lb/ton of Calcium Oxide not to exceed 10 lbs/hr or 43.8 TPY
			VOC	0.13 lb/MMBTU, not to exceed 10 lbs/hr or 46 TPY
			Fuel Limitation	Natural Gas, fuel oil with maximum 3% sulfur content, on-specification used oil, petroleum coke limited to 18,396 tons/yr on a consecutive rolling 12-month period with a maximum 7% sulfur and 2% nitrogen content.

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	APC-S-1, Section 3.1	3.A.1	Opacity	40%
	MACT Subpart MM, 40 CFR 63.862(a)(1)	3.B.4	HAP Metals (as PM)	0.095 gr/dscf corrected to 10% oxygen as established in accordance with the provisions of 40 CFR 63.862(a)(1)(ii) (Bubble Limit)
AA-005	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, modified December 17, 1996, May 1, 1998, and September 27, 1999.	3.B.3	PM	0.727 tons/MMlbs of BLS not to exceed 241 lbs/hr & 1054 TPY
			PM <sub>10</sub>	0.544 tons/MMlbs of BLS not to exceed 108 lbs/hr & 788 TPY
			SO <sub>2</sub>	7 lb/ton of equivalent air dried pulp not to exceed 449 lbs/hr & 1967 TPY
			NO <sub>x</sub>	0.20 lbs/MMBTU not to exceed 198 lbs/hr & 867 TPY
			CO	11.0 lb/ton of equivalent air dried pulp not to exceed 706 lbs/hr & 3092 TPY
			VOC	0.083 lb/MMBTU not to exceed 82 lbs/hr & 361 TPY
			Opacity	40%
			TRS	40 PPM (as H <sub>2</sub> S) dry gas basis corrected to 8% oxygen on a 12-hour average
			Fuel Limitation	Black Liquor Solids (BLS), Black Liquor Soaps, Natural Gas, or Fuel Oil.
	APC-S-1, Section 3.5	3.B.5	PM	4 lbs/ADT of Pulp
	APC-S-1, Section 4.1(a)	3.B.6	SO <sub>2</sub>	4.8 lbs/MMBTU
AA-006	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, modified December 17, 1996, May 1, 1998, September	3.B.3	PM	88.69 lb/hr or 388.50 TPY
			PM <sub>10</sub>	84.90 lb/hr or 371.88 TPY
			SO <sub>2</sub>	0.4766 lb/MMBTU not to exceed 415 lbs/hr & 1816 TPY
	MACT Subpart MM, 40 CFR 63.862(a)(1)	3.B.7	HAP Metals (as PM)	0.041gr/dscf corrected to 8 % oxygen and not exceed 65.85 lbs/hr or 288 tons/year as established in accordance with the provisions of 40 CFR 63.862(a)(1)(ii) (Bubble Limit) tons/year



Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	27, 1999, January 13, 2000, March 21, 2000, March 31, 2003.		NO <sub>x</sub>	0.30 lbs/MMBTU not to exceed 261 lbs/hr & 1143 TPY
			CO	0.40 lbs/MMBTU not to exceed 348 lbs/hr & 1542 TPY
			VOC	0.055 lb/MMBTU not to exceed 48 lbs/hr & 210 TPY
			Opacity	40%
			Fuel Usage Limitation	Woodwaste, Natural Gas, Fuel Oil with a maximum content of 3.0 % sulfur, on-specification used oil, LVHC gases, up to 50 tons/day of untreated cotton seed and/or nonhazardous pesticide treated cotton seed, and up to 7 tons/hour of Tire Derived Fuel (TDF). This cotton seed approval only applies to the firing of the cotton seed. The incineration of any seed containers is prohibited.
	APC-S-1 Section 4.1 (a)	3.B.6	SO <sub>2</sub>	4.8 lbs/MMBTU
	APC-S-1 Section 3.4.b	3.B.8	PM	0.3 gr/dscf
	Title V Permit issued February 28, 2000	3.B.9	pH of scrubbing medium	pH range 6.0 to 11.0
AA-003 and AA-006	Title V Permit issued February 28, 2000	3.B.10	Used Oil restriction	7,200,000 gallons per year
AA-007	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, modified December 17, 1996, May 1, 1998, September 27, 1999, January 13, 2000, March 21, 2000.	3.B.3	PM	0.091 tons/MMlbs of BLS, not to exceed 30 lbs/hr & 132 TPY
			TRS	0.0133 grams (as H <sub>2</sub> S) per kilogram of Black Liquor Solids (dry weight), not to exceed 2.2 lbs/hr and 9.6 tons/year
			Opacity	40%
	MACT Subpart MM, 40 CFR 63.862(a)(1)	3.B.11	HAP Metals (as PM)	0.16 lb of PM/ton black liquor solids fired, as established in accordance as established in accordance with the provisions of 40 CFR 63.862(a)(1) (Bubble Limit) by methods in §

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
				63.865a(1) and (2)
AA-009	Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, modified December 17, 1996, May 1, 1998, September 27, 1999, January 13, 2000, March 21, 2000.	3.B.3	PM	3.5 lbs/hr & 15.2 TPY
			Opacity	40%
AA-010 and AA-011	Construction Permit issued on April 14, 1997	3.B.12	Opacity	40%
			Operational Limitation	Shall not operate more than 5040 hrs/yr either AA-010 or AA-011
			Fuel Limitation	Natural Gas only
	APC-S-1 Section 4.1 (a)	3.B. 27	SO <sub>2</sub>	4.8 lbs/MMBTU
	APC-S-1 Section 3.4.(a)(2)	3.B.28	PM	$E = 0.8808 * I^{0.1667}$
AA-012 through AA-016	APC-S-1 Section 3.6(a)	3.B.13	PM	$E = 4.1p^{0.67}$
AA-012 through AA-015	APC-S-1, Section 3.2	3.A.2	Opacity	40%
AA-021	Construction permit issued September 1998	3.B.14	VOC	4.41 lb/hr and 19.3 tons/yr on a carbon basis
			TRS	0.30 lb/hr and 1.314 tons/year
AA-033 AA-037 AA-038 IA-001 AA-034	MACT Subpart S 40 CFR 63.443 (a)(1)	3.B.15	HAPs	See Condition
	MACT Subpart S 40 CFR 63.443 (c)	3.B.16	HAPs	See Condition
	MACT Subpart S 40 CFR 63.443 (d)(4)	3.B.17	HAPs	See Condition
	MACT Subpart S 40 CFR 63.443 (e)	3.B.18	HAPs	See Condition

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
	MACT Subpart S 40 CFR 63.446 (e)	3.B.19	HAPs	See Condition
	MACT Subpart S 40 CFR 63.446 (d)(2)	3.B.20	HAPs	See Condition
	MACT Subpart S 40 CFR 63.446 (d)(1)	3.B.21	HAPs	See Condition
	MACT Subpart S 40 CFR 63.450(b)	3.B.22	HAPs	See Condition
	MACT Subpart S 40 CFR 63.450(d)	3.B.23	HAPs	See Condition
AA-037 AA-038 IA-001 AA-034	40 CFR 60.283(a)(1)(iii)	3.B.24	TRS	Gases shall be incinerated in lime kiln or Power Boiler
AA-003 AA-005 AA-006 AA-007	CAM Requirements, 40 CFR 64	3.B.25	PM, PM10	Compliance Assurance Monitoring
AA-041	APC-S-1, Section 3.2	3.B.26	opacity	40%

- 3.B.1 The facility is subject to and shall comply with all applicable requirements, limitations, and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart S, Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. (Ref.: 40 CFR 63.440(a))
- 3.B.2 The facility is subject to and shall comply with all applicable requirements, limitations, and any subsequent revisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart MM, Standard for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills. (Ref.: 40 CFR 63.860(a))
- 3.B.3 For Emission Points AA-003, AA-005, AA-006, AA-007, and AA-009, the permittee shall comply with the limits established in the Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, modified December 17, 1996, May 1, 1998, September 27, 1999, January 13, 2000, March 21, 2000, and March 31, 2003, April 12, 2008, and September 2, 2008.
- 3.B.4 For Emission Point AA-003, the permittee shall not exceed particulate matter concentrations in excess of 0.095 gr/dscf corrected to 10 percent oxygen established using the methods in 40 CFR 63.865(a)(2) as an alternative to 40 CFR 63.862(a)(1)(i). (Ref.: 40 CFR 63.862(a)(1))
- 3.B.5 For Emission Point AA-005, the Kraft Recovery Boiler, emissions of particulate matter from the recovery furnace stack shall not exceed four (4) pounds per ton of equivalent air-dried kraft pulp produced at any time. (Ref: APC-S-1 Section 3.5).
- 3.B.6 For Emission Points AA-005 and AA-006, the maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref: APC-S-1 Section 4.1(a))
- 3.B.7 For Emission Point AA-005, the permittee shall not discharge into the atmosphere any gases from the existing Kraft recovery boiler which contain a concentration of particulate matter in excess of 0.041 gr/dscf corrected to 8% oxygen established as an alternative to 40 CFR 63.862(a)(1)(i)(A) (Ref.: 40 CFR 63.862(a)(1)(ii))
- 3.B.8 For Emission Point AA-006, fuel burning operations utilizing a mixture of combustibles such as, but not limited to, fossil fuels plus bark, oil plus bark, or spent wood, or water treatment by-products sludge, may be allowed particulate

matter emission rates up to 0.30 grains per standard dry cubic foot. (Ref: APC-S-1 Section 3.4(b))

- 3.B.9 For Emission Point AA-006 when the power boiler is used to combust LVHC gases, the scrubber shall be operated at all times using a scrubbing medium with a pH of 6.0 to 11.0 to ensure the removal of SO<sub>2</sub> from the boiler's exhaust gases (Ref: Title V Permit issued February 28, 2000).
- 3.B.10 For Emission Points AA-003 and AA-006, the total on-specification used oil to be fired in both emission units combined shall be limited to a maximum of 7,200,000 gallons per year on a consecutive 12-month rolling total basis. This fuel usage restriction will ensure that potential lead emission increases shall not exceed the PSD significant threshold limit of 0.6 TPY for Lead (Pb), based on the defining criteria for on-specification used oil found in the federal regulation 40 CFR Part 279.11. (Ref: Title V permit issued February 28, 2000)
- 3.B.11 For Emission Point AA-007, the permittee shall not discharge into the atmosphere any gases from the existing smelt dissolving tank which contain a concentration of particulate matter in excess of 0.16 lbs/ton of black liquor solids fired. (Ref 40 CFR 63.862(a)(1)).
- 3.B.12 For Emission Points AA-010 & AA-011, the permittee shall comply with the limits established in their Construction Permit issued on April 14, 1997. (Ref: Construction Permit issued April 14, 1997)
- 3.B.13 For Emission Points AA-012 thru AA-016, except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship
- $$E = 4.1p^{0.67}$$
- where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.
- Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs.
- 3.B.14 For Emission Point AA-021, the permittee shall not exceed VOC emission limits of 4.41 lb/hr and 19.3 TPY on a carbon basis, and TRS emission limits of 0.30 lb/hr and 1.314 TPY. (Ref: Federally Enforceable Construction Permit issued September 29, 1998)
- 3.B.15 The permittee utilizing the kraft pulping system shall control the total HAP emissions for each LVHC system for Emission Points AA-033, AA-037, AA-

038, IA-001, and the pulp washing system for Emission Point AA-034 . (Ref.: 40 CFR 63.443 (a)(1) and Subpart S Table 1)

- 3.B.16 For Emission Points AA-033, AA-037, AA-038, IA-001, and AA-034 associated with the LVHC system and the pulp washing system as listed in 40 CFR 63.443 (a)(1) shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in 40 CFR 63.443(d). The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450. (Ref.: 40 CFR 63.443 (c))
- 3.B.17 For Emission Points AA-033, AA-037, AA-038, IA-001, and AA-034, the permittee shall control total HAP emissions by introducing the HAP emission stream with the primary fuel into the flame zone of the lime kiln or the power boiler. (Ref.: 40 CFR 63.443 (d)(4)(i)).
- 3.B.18 For Emission Points AA-037, AA-038, IA-001, and AA-034, periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of 40 CFR 63.443(c) and (d), provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed the following level:
  - (a) One percent for control devices used to reduce the total HAP emissions from the LVHC system. (Ref.: 40 CFR 63.443 (e)(1))
  - (b) Four percent for control devices used to reduce the total HAP emissions from the HVLC system. (Ref.: 40 CFR 63.443 (e)(2))

- 3.B.19 The permittee shall comply with standards for condensates from the following kraft pulping process systems listed in 40 CFR 63.446(b) that include the digester systems, the turpentine recovery system, the evaporator system, the HVLC collection system and the LVHC system by collecting the kraft pulping condensates that contain a total HAP mass of 7.2 lbs/ton ODP or more. The condensates shall be collected in the Main Foul Condensate Collection Tank and conveyed to the mill's aerated stabilization basin (ASB) (AA-036), in a closed collection system per 40 CFR 63.446(d) where it will be discharged below the surface by meeting one of the following requirements as specified in 40 CFR 63.446(e)(3) or (4): (1) reducing the total HAPs by 92% or more by weight (2) remove 6.6 pounds of total HAPs/ ton of ODP (3) achieve a total HAP concentration of 210 ppm or less by weight at the outlet of the control device. For purposes of complying with 40 CFR 63.446 (e)(2) for kraft pulping condensates by biological treatment, the permittee shall measure the total HAP concentration as methanol, acetaldehyde, methyl ethyl ketone, and propionaldehyde and follow the procedures in 40 CFR 457 (l)(1) and (2) (40 CFR 63.457 (g)).
- 3.B.20 Pulping process condensates generated from the following kraft pulping process systems that include the digester systems, the turpentine recovery system, the evaporator system, the HVLC collection system and the LVHC shall be conveyed in a closed collection system that is designed and operated to meet the requirements specified. For the condensate tanks in the closed collection system, the tank shall meet the following requirements:
- (a) 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 the background; and vented into a closed vent system that meets the requirements of 40 CFR 63.450 and routed to control devices AA-003 or AA-006, that meets the requirements of 40 CFR 63.443(d), and
  - (b) Each opening shall be maintained in a closed, sealed position at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream, except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair. (Ref.: 40 CFR 63.446(d)(2))
- 3.B.21 Pulping process condensates generated from the following kraft pulping process systems that include the digester systems, the turpentine recovery system, the evaporator system, the HVLC collection system and the LVHC collection system shall be conveyed in a closed collection system designed and operated to meet the individual drain system requirements specified in §§63.960, 63.961, and 63.962 of Subpart RR, except for the closed vent systems and control devices which shall be designed and operated in accordance with §§63.443(d) and 63.450

instead of § 63.693 as specified §63.962(a)(3)(ii), (b)(3)(ii)(A), and b(5)(iii). (Ref.: 40 CFR 63.446(d)(1)).

- 3.B.22 For Emission Points AA-034, AA-037, AA-038, and IA-001, each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Each enclosure or hood opening closed during the initial performance test specified in 40 CFR 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs. (Ref.: 40 CFR 63.450(b))
- 3.B.23 For Emission Points AA-034, AA-037, AA-038, and IA-001 for each bypass line in the closed-vent system that could divert vent streams containing HAPs to the atmosphere without meeting the limitations in 40 CFR 63.443, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line. For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. (Ref.: 40 CFR 63.450(d))
- 3.B.24 For Emission Points AA-034, AA-037, AA-038, and IA-001, the permittee shall not cause to be discharged into the atmosphere from any digester system, brown stock washer system, multiple-effect evaporator system, or condensate stripper system any gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10 percent oxygen, unless the following condition is met: The gases are combusted with other waste gases in an incinerator or other device, or combusted in a lime kiln or recovery furnace not subject to this subpart, and are subjected to a minimum temperature of 1200 degrees F, for at least 0.5 second. (Ref: 40 CFR 60.283 (a)(1)(iii))
- 3.B.25 For Emission Points AA-003, AA-005, AA-006, and AA-007, the permittee is subject to the Compliance Assurance Monitoring requirements as established in 40 CFR 64. (Ref.:40 CFR 64).
- 3.B.26 For Emission Point AA-041, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity. This shall not apply to vision obscuration caused by uncombined water droplets. (Ref.: APC-S-1, Section 3.2)
- 3.B.27 For Emission Points AA-010 and AA-011, the maximum discharge of sulfur dioxides shall not exceed 4.8 pounds (measured as sulfur dioxide) per million



BTU heat input in which fuel is burned to produce heat or power by indirect heat transfer. (APC-S-1, Section 4.1(a)).

- 3.B.28 For Emission Points AA-010 and AA-011, the maximum discharge of ash and/or particulate matter for fossil fuel operations between 10 million and 10,000 million BTUs per hour heat input shall not exceed an emission rate determined by the relationship

$$E = 0.8808 * I^{-0.1667}$$

where E is the emission rate in pounds per million BTU per hour heat input and I is the heat input in millions of BTU per hour. (APC-S-1, Section 3.4(a)(2)).

- 3.B.29 The facility is subject to and shall comply with all applicable requirements, limitations, and any subsequent revisions for NSPS Standards for Kraft Pulp Mills (Ref.: 40 CFR Part 60 Subpart BB).

C. Insignificant and Trivial Activity Emission Limitations & Standards

Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
APC-S-1, Section 3.4(a)(1)	3.C.1  &  1.19	PM	0.6 lbs/MMBTU  or  as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2  &  1.19	SO <sub>2</sub>	4.8 lbs/MMBTU  or  as otherwise limited by facility modification restrictions
APC-S-1, Section 3.6(a)	3.C.3	PM	$E=4.1p^{0.67}$

3.C.1 The maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input. (Ref: APC-S-1 Section 3.4(a)(1))

3.C.2 The maximum discharge of sulfur oxides from any fuel burning installation in which the fuel is burned primarily to produce heat or power by indirect heat transfer shall not exceed 4.8 pounds (measured as sulfur dioxide) per million BTU heat input. (Ref: APC-S-1 Section 4.1(a))

3.C.3 Except as otherwise specified, no person shall cause, permit, or allow the emission from any manufacturing process, in any one hour from any point source, particulate matter in total quantities in excess of the amount determined by the relationship

$$E=4.1p^{0.67}$$

where E is the emission rate in pounds per hour and p is the process weight input rate in tons per hour.

Conveyor discharge of coarse solid matter may be allowed if no nuisance is created beyond the property boundary where the discharge occurs. (Ref. APC-S-1, Section 3.6(a))

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-005	NESHAP Subpart MM 40 CFR 63.864 (k)(1)(i)	3.D.1(a)	Corrective Action	Permittee must implement corrective action, when Opacity Monitoring indicates that the average of ten (10) consecutive 6-minute averages result in a measurement greater than 20% opacity.
AA-003 AA-007	NESHAP Subpart MM 40 CFR 63.864(k)(1)(ii)	3.D.1(b)	Corrective Action	Permittee must implement corrective action, when any 3-hour average parametric monitoring value is outside of the parameter values established in accordance with 40 CFR 63.864 (j) and Section 5.B of this document.
AA-033 AA-037 AA-038 IA-001 AA-034	NESHAP, Subpart S, 40 CFR 63.454	3.D.2	Inspection Plan	For each applicable enclosure opening, closed vent system, and closed collection system, the permittee shall prepare and maintain a site-specific inspection plan.
AA-003 AA-005 AA-007	NESHAP Subpart MM 40 CFR 63.866(a)).	3.D.3	Written plan for startup, shutdown, and malfunction	Permittee must develop procedures for operating the sources and corrective action for malfunctioning process and control systems to meet 40 CFR Subpart MM

3.D.1 The permittee shall be required to implement corrective action, in accordance with 40 CFR 63.864(k) when the following monitoring exceedances occur:

- (a) For the Kraft Recovery Boiler, Emission Point AA-005, equipped with an ESP, when opacity monitoring indicates that the average of ten (10) consecutive 6-minute averages result in a measurement greater than 20% opacity. (Ref. 40 CFR 63.864(k)(1)(i))
- (b) For the Lime Kiln, AA-003, and Smelt Dissolving Tank, AA-007, both equipped with wet scrubbers, when any 3-hour average of an established parameter is outside of the parametric range established in accordance with 40 CFR 63.864(j).(Ref.: 40 CFR 63.864(k)(1)(ii))

3.D.2 For Emission Points AA-033, AA-037, AA-038, IA-001, and AA-034, the permittee shall prepare and maintain a site-specific inspection plan for each applicable enclosure opening, closed-vent system, and closed collection system. The plan must include a drawing or schematic of the components of applicable affected equipment and shall record the following for each inspection:

- (a) The date each inspection is conducted;

- (b) The equipment type and identification;
  - (c) The results of negative pressure tests;
  - (d) The 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) The 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 of the problem;
  - (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
  - (l) The duration of the use of bypass valves on computer controlled valves.(Ref.: 40 CFR 63.454)
- 3.D.3 For Emission Points AA-003, AA-005, and AA-007 for control of particulate matter to meet 40 CFR Subpart MM, the permittee shall develop a written plan as described in § 63.6(e)(3) that contains specific procedures for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. The plan should include the following:
- (a) Procedures to address any process parameter level that is inconsistent with the levels established under § 63.864(j)
  - (b) Procedures to ensure the time any exceedance began and ended are recorded, as well as the cause of the exceedance.
  - (c) Procedures to implement corrective action in the event of an exceedance.

- (d) Procedures to implement a maintenance schedule for each control technique which is consistent but not limited to manufacture's instructions and recommendations for routine and long-term maintenance.
- (e) Procedures to implement an inspection schedule that ensures at least once per day, each continuous monitoring system required under 40 CFR 63.864 is properly functioning (40 CFR63.866(a)).

#### **SECTION 4. COMPLIANCE SCHEDULE**

- 4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.
- 4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:
- (a) the identification of each term or condition of the permit that is the basis of the certification;
  - (b) the compliance status;
  - (c) whether compliance was continuous or intermittent;
  - (d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;
  - (e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit. (Ref.: APC-S-6, Section III.C.5.a.,c.,&d.)

## SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

### A. General Monitoring, Recordkeeping and Reporting Requirements

- 5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.
- 5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:
  - (a) the date, place as defined in the permit, and time of sampling or measurements;
  - (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 existing at the time of sampling or measurement. (Ref.: APC-S-6, Section III.A.3.b.(1)(a)-(f))
- 5.A.3 Except as otherwise specified herein, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. (Ref.: APC-S-6, Section III.A.3.b.(2))
- 5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with APC-S-6, Section II.E. (Ref.: APC-S-6, Section III.A.3.c.(1))

- 5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began. (Ref.: APC-S-6, Section III.A.3.c.(2))
- 5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions or their equivalents approved by the DEQ and the EPA.
- 5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.



B. Specific Monitoring and Recordkeeping Requirements

- 5.B.1 For Emission Points AA-003, & AA-006, for fuel oil and petroleum coke, the permittee shall maintain records to document (type, monthly usage rate and the consecutive 12-month rolling total, and % sulfur). This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.(c)(1))
- 5.B.2 For Emission Points AA-003 & AA-006, for on-specification used oil, the permittee shall keep records of the monthly usage rate and the consecutive 12-month rolling total. (Ref: APC-S-6, Section III.A.3.a(2))
- 5.B.3 For used oil that meets the fuel specifications under 279.11, the permittee must keep a record of each shipment which include: (1) name and address of the facility receiving the shipment (2) quantity of used oil delivered (3) date of shipment or delivery (4) a cross reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under §279.72(a). These records shall be maintained for three years. (Ref. APC-S-6, Section III.A.3.a(2)).
- 5.B.4 For Emission Point AA-006, the permittee shall keep records in tons/hour for tire derived fuels (TDF) for each hour of operation that the power boiler utilizes TDF and in tons per day for any non-hazardous pesticide treated cottonseed burned within the day. (Ref. APC-S-6, Section III.A.3.a(2)).
- 5.B.5 For Emission Points AA-003, the permittee shall maintain records to document the Calcium Oxide (CaO) produced in Mg/day or tons/day. (Ref: APC-S-6, Section III.A.3.a(2); 40 CFR 63.866(c)(2))
- 5.B.6 For Emission Point AA-003 and AA-005, the permittee shall calculate and record on a daily basis, the 12-hour average TRS concentration and O<sub>2</sub> concentration for the two consecutive operating periods of each operating day for both the recovery boiler and lime kiln. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 continuous 1-hour average concentrations. Each 12-hour average TRS concentration shall be corrected to 10% O<sub>2</sub> for the kiln and 8% O<sub>2</sub> for the recovery boiler using the equation defined in 40 CFR 60.284(c)(3). (Ref: APC-S-1, Section IV.2(f)3)

- 5.B.7 For Emission Points AA-003 , the kiln with a wet scrubber, the permittee must install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the pressure drop across the scrubber, and the scrubber liquid flow rate at least once every successive 15-minute period using the procedure in § 63.8 (c ) , as well as the procedures in paragraphs e(10)(i) and e(10)(ii) of this section. (Ref 40 CFR 63.864(e))
- 5.B.8 For Emission Points AA-003, the kiln with a wet scrubber, the permittee is in violation of Condition 3.B.4 as established in § 63.862 when six or more of the three hour average parameter values are outside the range of values established in accordance with 40 CFR 463.864(j). (Ref.:40 CFR 63.864(k)(2)(iii))
- 5.B.9 Emission Point AA-003, to indicate compliance with the SO<sub>2</sub> limit, the weekly scrubber pH shall be monitored and recorded. An exceedance is defined as a weekly scrubber pH greater than two (2.0) standard units below the average pH of the scrubber recirculation solution during the most recent compliance test. Any exceedance shall be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1)).
- 5.B.10 For Emission Point AA-003, to indicate compliance with NO<sub>X</sub> limits, the permittee shall continuously monitor and record each three hour average temperature for the hot end of the lime kiln. An exceedance is defined as any three hour average exceeding 50 degrees F of the average value for the most recent compliance test for NO<sub>X</sub>. Any exceedance shall be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1)).
- 5.B.11 For Emission Points AA-003, the permittee shall monitor the emission of TRS and/or other gas constituents as described below per APC-S-1, Section 4.2(f)3 :
- (a) The TRS emission concentration in the lime kiln (AA-003) flue gas shall be monitored by a continuous monitoring device which meets the requirements of 40 CFR 60, Performance Specification 5.
  - (b) The oxygen concentration in the lime kiln (AA-003) flue gas shall be continuously monitored by a device which meets the requirements of 40 CFR 60, Performance Specification 3. (Ref: APC-S-6, Section III.A.3.c(1)).
- 5.B.12 For Emission Point AA-003, the permittee shall demonstrate compliance with PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>X</sub>, CO, VOC, and TRS emission limitations by stack testing once per permit term at a minimum of 80% of the operating capacity, in accordance with EPA Reference Methods and submittal of a stack test report.

A pretest conference at least thirty (30) days prior to each scheduled test date is needed to ensure that all test methods and procedures are acceptable to the

MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref: APC-S-6, Section III.A.3.c(1)).

- 5.B.13 For Emission Points AA-003 and AA-007, the CAM Plan as outlined 5.B.61 and 5.B.64 must meet the monitoring requirements as outlined for a lime kiln with a scrubber and a smelt dissolving tank with a scrubber as outline in 40 CFR 63 Subpart MM. (Ref: 40 CFR Part 63.864(e)(10)).
- 5.B.14 For Emission Points AA-003, AA-005, and AA-007, the facility must maintain the general records required by 40 CFR 63.10(b)(2) plus the following parametric monitoring data:
- (a) Records of the parameter monitoring data required under 40 CFR 63. 864, including the following information:
    - (1) Any period when the operating parameter levels were inconsistent with the levels established during the initial and/or most recent performance test;
    - (2) A brief explanation of the cause of the deviation;
    - (3) The time the deviation occurred;
    - (4) The time corrective action was initiated and completed; and
    - (5) The corrective action taken;
  - (b) All records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865 (a) through (e); and
  - (c) Records of any monitoring parameter ranges established for each affected source or process unit. (Ref.: 40 CFR 63.866(c)(3) through (c)(5))
- 5.B.15 For Emission Point AA-005, the permittee shall maintain records to document fuel usage (type, rates, and sulfur analysis under APC-S-6, Section III.A.3.c(1)) and black liquor solids (BLS) usage in tons/day under 40 CFR 63.866 (c)(1) (Ref: APC-S-6, Section III.A.3.)
- 5.B.16 For Emission Points AA-005, the permittee shall monitor the emission of TRS and/or other gas constituents as described below per APC-S-1, Section 4.2(f)(3):

- (a) The TRS emission concentration in recovery boiler (AA-005) flue gas shall be monitored by a continuous monitoring device which meets the requirements of 40 CFR 60, Performance Specification 5.
- (b) The oxygen concentration in recovery boiler (AA-005) flue gas shall be continuously monitored by a device which meets the requirements of 40 CFR 60, Performance Specification 3. (Ref: APC-S-6, Section III.A.3).
- 5.B.17 For Emission Point AA-005, the recovery boiler equipped with an ESP, the permittee shall install, calibrate, maintain, and operate a COMS according to the provisions in §§ 63.6(h) and 63.8 that shall include a cycle of sampling and analyzing every successive 10- second period and one cycle of data recording for each successive 6-minute period (Ref.: 40 CFR 63.864(d))
- 5.B.18 For Emission Point AA-005, the recovery boiler with an ESP, the permittee must implement corrective action when the average of ten consecutive 6-minute averages result in a measurement of greater than 20% opacity (Ref.: 40 CFR 63.864 (k)(1)(i))
- 5.B.19 For Emission Points AA-005, the recovery boiler with an ESP, the permittee is in violation of §63.862, if excess opacity emissions exceed 35% for 6 percent or more of the operating time within any quarterly period. (Ref.: 40 CFR 63.864(k)(2)(i))
- 5.B.20 For Emission Point AA-005, the permittee shall demonstrate compliance with PM, NOX, CO, and VOC emission limitations by stack testing once per permit term at a minimum of 80% of the operating capacity, in accordance with EPA Reference Methods and submittal of a stack test report.

A pretest conference at least thirty (30) days prior to each scheduled test date is needed to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref: APC-S-6, Section III.A.3.c(1)).

- 5.B.21 For Emission Point AA-005, the permittee shall indicate compliance with SO<sub>2</sub> emission limitations by monitoring and recording each 12-hour average stack SO<sub>2</sub> concentration corrected to 8% Oxygen from a certified CEMS. The non-certified SO<sub>2</sub> CEMS will conform to the same QA/QC procedures, daily calibrations, and sample conditioning techniques as the certified TRS CEMS. The permittee shall report any deviations greater than 246 ppm at 8% Oxygen. This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.22 For Emission Point AA-005, the permittee shall maintain an Operation and Maintenance (O & M) Plan for the electrostatic precipitator (ESP) control device. The O & M Plan should be maintained on-site in accordance with requirement 5.A.3 of this document. The plan should include, but is not limited to the following information:
- (a) An Operational Checklist (i.e. number of fields energized, minimum voltage level);
  - (b) Operational Procedures;
  - (c) Documentation of Maintenance Schedules and Maintenance Activity Performed;  
The permittee shall maintain records of any operational and/or maintenance activities associated with the ESP's O&M plan in accordance with Requirement 5.A.3 of this document. All records shall be made available upon request by MDEQ personnel
- 5.B.23 For Emission Points AA-006 and AA-021, regular maintenance shall be performed each month or more often if necessary to maintain proper operation of the pollution control equipment. Records of this maintenance shall be kept in log form and must be made available for review upon request during any inspection visit by MDEQ personnel. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.24 For Emission Points AA-006 and AA-021, the permittee shall maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul the pollution control equipment. In the event of a failure of the pollution control equipment, the permittee shall cease operations until such time as repairs are made and the proper efficiency of the pollution control equipment is restored. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.25 For Emission Point AA-006, the permittee shall demonstrate compliance with PM, PM<sub>10</sub>, SO<sub>2</sub>, VOC, and opacity, by stack testing once per permit term, in accordance with EPA Reference Methods and submittal of a stack test report. The permittee shall demonstrate compliance with NO<sub>x</sub>, and CO emission limitations by stack testing annually, in accordance with EPA Reference Methods and submittal of a stack test report. During the stack test for PM, operating

parameters for scrubber flow rate and the gas pressure differential shall be established to satisfy the CAM Plan under Condition 5.B.63 of this permit. This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3)

A pretest conference at least thirty (30) days prior to each scheduled test date is needed to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref: APC-S-6, Section III.A.3.c(1))

- 5.B.26 For Emission Point AA-006, the permittee shall demonstrate compliance with the PM, PM<sub>10</sub> and Opacity limits by recording the pressure differential and scrubber flow daily in accordance with Condition 3.B.3. The permittee shall report any excursions for gas pressure differential and the scrubber liquid flow rate as determined in the most recent compliance demonstration for particulate matter and opacity (Ref: APC-S-6, Section III.A.3.c.)`
- 5.B.27 For Emission Point AA-006, the permittee shall assure compliance with SO<sub>2</sub> at all times in which the boiler is used for LVHC control by monitoring the pH of the scrubbing medium in the scrubber liquid recycle line and documenting at a frequency of once per 8-hour shift. The permittee shall report any deviations for which the pH is outside of the range 6.0 to 11.0. This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c)
- 5.B.28 For Emission Point AA-007, the Smelt Dissolving Tank, the permittee shall maintain records to document daily the mass of black liquor solid (BLS) fed to the recovery boiler in tons per day. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.29 For Emission Points AA-007, the Smelt Dissolving Tank with a wet scrubber, the permittee must install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the current pulled by the scrubber fan in amps, and the scrubber liquid flow rate measured in gpm at least once every successive 15-minute period using the procedure in § 63.8 (c), as well as the procedures in paragraphs (e)(10)(i) and (e)(10)(ii) of §63.864. (Ref 40 CFR 63.864(e))
- 5.B.30 For Emission Points AA-007, the Smelt Dissolving Tank with a wet scrubber, the permittee must implement corrective action when any three 3-hour average parameter value for the fan amperage or scrubber flow rate is outside the range as established in 40 CFR 63.864(j) (Ref.:40 CFR 63.864(k)(1)(ii))
- 5.B.31 For Emission Points AA-007, the Smelt Dissolving Tank with a wet scrubber, the permittee is in violation of Condition 3.B.11 as established in § 63.862 when six

or more of the three hour average parameter values are outside the range of values established in accordance with 40 CFR 463.864(j). (Ref.:40 CFR 63.864(k)(2)(iii))

- 5.B.32 The permittee shall demonstrate compliance with PM and TRS emission limitations by stack testing Emission Point AA-007 once per permit term, in accordance with EPA Reference Methods and submittal of a stack test report.

A pretest conference at least thirty (30) days prior to each scheduled test date is needed to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref: APC-S-6, Section III.A.3.c(1)) (Ref: APC-S-6, Section III.A.3.c(1) and 40 CFR 63.864(b)(1))

- 5.B.33 For Emission Point AA-009, the lime slaker, the permittee shall demonstrate compliance with PM emission limitations by stack testing in accordance with EPA Reference Methods once within the lifetime of the permit.

A pretest conference at least thirty (30) days prior to each scheduled test date is needed to ensure that all test methods and procedures are acceptable to the MDEQ. Also, the MDEQ must be notified prior to the scheduled test date. At least TEN (10) DAYS notice should be given so that an observer may be scheduled to witness the test(s). (Ref: APC-S-6, Section III.A.3.c(1))

- 5.B.34 For Emission Point AA-009, the permittee shall demonstrate compliance with PM limits by monitoring and recording the scrubber flow daily. The permittee shall report any deviations of less than 80% of the average value of the scrubber flow during the most recent compliance test for PM emissions. This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1))

- 5.B.35 For Emission Points AA-010 and AA-011, the temporary package boilers, the permittee must determine the applicability of the New Source Performance Standards (NSPS) as described in 40 CFR 60, Subpart Dc, and comply with the monitoring and recordkeeping requirement:

**Fuel Monitoring:**

The permittee shall record and maintain records of the amounts of each fuel combusted during each day. (Ref. 40 CFR 60.48c(g))

- 5.B.36 For Emission Points AA-010 and AA-011, the permittee shall document the hours of operation each day and for each consecutive 365-day period. The records shall be maintained at the facility for a period of five (5) years from the origination of

said records and shall be presented to the MDEQ upon request.(Ref: APC-S-6, Section III.A.3.c(1))

- 5.B.37 For Emission Points AA-012 through AA-015, the permittee shall assure compliance with the opacity limitations by weekly observations of emissions from exhaust stacks. If any visible emissions are detected, EPA Reference Method 9 shall be performed. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.38 For Emission Point AA-021, the Crude Tall Oil Plant with scrubber, the permittee shall demonstrate compliance with VOC and TRS limits by monitoring and recording scrubber flow and pH daily. The permittee shall report any occurrences when the recirculation flow is outside 55 to 65 gpm, and the scrubber pH is outside 10.7 to 12.0 standard units. This data will be reported in accordance with Condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1))
- 5.B.39 For Emission Points AA-006, AA-009, and AA-021, the permittee shall when approaching a parametric value describe in the parametric monitoring conditions of this permit investigate and mitigate, if necessary the conditions leading to the potential excursion.
- 5.B.40 For Emission Points AA-006, AA-009, and AA-021, variances from periodic monitoring parameters during normal operations will not be considered violations of the applicable standard being monitored; however, variances from established periodic monitoring ranges will mandate prompt operator corrective action to get the process operating within the periodic monitoring range(s) and reporting of the event in accordance with 5.A.4. Compliance with specified emission standards is tied to or based on the averaging time of the associated applicable test method.
- 5.B.41 For Emission Points AA-033, AA-034, AA-037, AA-038, and IA-001, the permittee shall install, calibrate, certify, operate, and maintain according to the manufacturers specifications, a continuous monitoring system (CMS) as specified in 40 CFR 63.453 paragraphs (b) through (m), except as allowed in paragraph (m). The CMS shall include a continuous recorder.  
(Ref.:40 CFR 63.453(a))
- 5.B.42 For the CMS required in 5.B.41, the system shall be operated to measure the appropriate parameters determined according to the procedures specified in 40 CFR 63.453(n) to comply with the condensate applicability requirements of 40 CFR 63.446(c)(3). The methodology used to determine initial and continuous compliance with the condensate collection requirement is attached in Appendix C (Site Specific Test Plan for Compliance with 40 CFR 63.446(c)(3) Condensate Collection Requirements, includes CMS protocol). (Ref.: 40 CFR 63.453(i)).



- 5.B.43 The permittee using a open biological treatment system to treat kraft pulping condensates shall perform the following monitoring procedures to comply with 40 CFR 63.446(e)(2):
- (a) Conduct daily monitoring of the site specific parameter(s) established according to procedures specified in 63.453(n). (Ref.: 40 CFR 63.453(j)(2))
  - (b) Conduct a performance test as specified in 63.457(l) within 45 days after the beginning of each quarter and meet the applicable emission limit in 63.446(e)(2).
    - (1) The performance test conducted in the first quarter (annually) shall be performed for total HAP as specified in 63.457(g) and meet the mass removal emission limit specified in 63.446(e)(2)).
    - (2) The remaining quarterly performance tests shall be performed as specified in 40 CFR 63.453(j)(3)(i) except that the permittee may use the methanol procedure in 63.457(l)(2) and the value of r determined during the first quarter test instead of measuring the additional HAP to determine a new value of r. (Ref.: 40 CFR 63.453 (j)(3))
- 5.B.44 Each enclosure and closed-vent system used to comply with 40 CFR 63.450(a) shall comply with the requirements specified in 40 CFR 63.453(k)(1) through (6). (Ref.:40 CFR 63.453(k))
- 5.B.45 For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b) shall be performed during each calendar month with at least 21 days elapsed between inspections, and as other times as requested by DEQ to ensure the opening is maintained in the closed position and sealed. (Ref.: 40 CFR 63.453(k)(1))
- 5.B.46 Each enclosed vent system required by 40 CFR 63.450(a) shall be visually inspected during each calendar month and with at least 21 days elapsed between inspections, and as other times as requested by DEQ. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects. (Ref.: 40 CFR 63.453(k)(2))
- 5.B.47 For positive pressure closed-vent systems or portions of closed-vent systems, the permittee shall 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). (Ref.: 40 CFR 63.453(k)(3))
- 5.B.48 The permittee shall demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e). (Ref.: 40 CFR 63.453(k)(4))

- 5.B.49 The valve or closure mechanism specified in 40 CFR 63.450(d)(2) shall be inspected during each calendar month with at least 21 days elapsed 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. (Ref.: 40 CFR 63.453(k)(5))
- 5.B.50 If an inspection required by paragraphs 5.B.46 through 5.B.50 identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 parts per million 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:
- (a) 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.
  - (b) 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 owner or operator 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. (Ref.: 40 CFR 63.453(k)(6))
- 5.B.51 Each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d) for conveyance of pulping condensates shall comply with the following:
- (a) Each pulping process condensate closed collection shall be visually inspected each calendar month with at least 21 days elapsed between inspections, and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964 of Subpart RR. except:
    - (1) Owners or Operators shall comply with the recordkeeping requirements of §63.964(a)(1)(vi) and (b)(3) of Subpart RR of Part 63.
    - (2) Owners or Operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified paragraphs (a) and (k) of 40 CFR 63.453 instead of the requirements specified in §63.964(a)(2) of subpart RR of Part 63.
  - (b) Each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in §63.446(d)(2)(i) measured initially and annually by the procedures specified in § 63.457(d).

- (c) If an inspection required by this section identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then corrective actions specified in §63.964(b) of Subpart RR of Part 63. (Ref.: 40 CFR 63.453(l)).

5.B.52 To establish or reestablish the value for each operating parameter required to be monitored under 40 CFR 63.453(i), (j), and (l), or to establish appropriate parameters for 40 CFR 63.453(i) and (j)(2), the permittee shall use the following procedures:

- (a) During the initial performance test required in 40 CFR 63.457(a) or any subsequent performance test, continuously record the parameter;
- (b) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations
- (c) The permittee shall provide for MDEQ approval the rationale for selecting the monitoring parameters necessary to comply with 40 CFR 63.453(i);
- (d) Provide for MDEQ approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard. (40 CFR 63.4543(n)).

The methodology to be used, the parameters to be monitored, and the rationale for using them to demonstrate compliance with the standards are attached in Appendix D.

- 5.B.53 The permittee, with a control device subject to the monitoring provisions of 40 CFR 63.453, shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under 40 CFR 63.453(a), (i), (j), (l), and (n) and established under 40 CFR Part 63, Subpart S. Except as provided in 40 CFR 63.453(p), 63.443(e), or 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under 40 CFR Part 63, Subpart S or failure to perform procedures required by 40 CFR Part 63, Subpart S shall constitute a violation of the applicable emission standard of 40 CFR Part 63, Subpart S and be reported as a period of excess emissions.
- (Ref.: 40 CFR 63.453(o))

- 5.B.54 The permittee, with a biological treatment system complying with 40 CFR 63.453(j)(2) may choose to conduct a performance test to demonstrate compliance with the applicable emission limit whenever a monitoring parameter excursion occurs. A monitoring parameter excursion occurs whenever the monitoring parameters specified in 63.453(j)(2) are below minimum operation parameter values or above maximum operating parameter values established in 40 CFR 63.453(n).
- (a) The following shall occur and be recorded as soon as practical:
- (1) Determine compliance with 40 CFR 63.446(e)(2) using the mass removal calculation specified in 40 CFR 63.457(l) and the monitoring data specified in 40 CFR 63.453(j)(1) that coincide with the time period of the parameter excursion;
  - (2) Steps shall be taken to repair or adjust the operation of the process to end the parameter excursion period; and
  - (3) Steps shall be taken to minimize total HAP emissions to the atmosphere during the parameter excursion period.
- (b) A parameter excursion is not a violation of the applicable emission standard if the results of the performance test conducted using the procedures in this paragraph demonstrate compliance with the applicable emission limit in 63.446(e)(2) and (4).
- (1) Conduct a performance test as specified in 63.457 using the monitoring data specified in 63.453(j)(2) that coincides with the time of the parameter excursion. No maintenance or changes shall be made to the open biological treatment system after the beginning of a parameter excursion that would influence the results of the performance test.
  - (2) If the results of the performance test specified in 5.B.51 (b)(i) demonstrate compliance with the applicable emission limit in 63.446(e)(2) and (4), then the parameter excursion is not a violation of the applicable emission limit.
  - (3) If the results of the performance test specified in 5.B.51(b)(i) do not demonstrate compliance with the applicable emission limit because the total HAP mass entering the open biological treatment system is below the level needed to demonstrate compliance with the applicable emission limit, then the permittee shall perform the following comparisons:
    - (i) The value of  $f_{\text{bio}}$  (MeOH) determined during the performance test specified in 5.B.51(b)(i) of this section is within the range of values established during the initial and subsequent performance tests

approved by the Administrator, then the parameter excursion is not a violation of the applicable standard.

- (ii) If the value of  $f_{bio}$  (MeOH) determined during the performance test specified in 5.B.44(b)(i) of this section is not within the range of values established during the initial and subsequent performance tests approved by the Administrator, then the parameter excursion is a violation of the applicable standard.

- (c) The results of the performance test specified in 5.B.51(b)I shall be recorded as specified in 63.454(f).  
(Ref.: 40 CFR 63.453(p))

5.B.55 Biological treatment mass removal methanol procedure. For the purposes of complying with the condensate treatment requirements specified in 40 CFR 63.446(e)(2) and (5), the methanol mass removal shall be calculated using the following equation:

$$F = F_b * (f_{bio}(\text{MeOH}) / (1 + 1.087(r)))$$

Where:

$F$  = Methanol mass removal (kg/Mg ODP)

$F_b$  = Inlet mass flow rate of methanol (kg/Mg ODP) determined using the procedures in 40 CFR 63.457 (j)(2).

$f_{bio}(\text{MeOH})$  = The fraction of methanol removed in the biological treatment system. The site-specific biorate constants shall be determined using the appropriate procedures specified in Appendix C of this part

$r$  = Ratio of sum of acetaldehyde, methyl ethyl ketone, and propionaldehyde mass to methanol mass determined using the procedures in paragraph (1) of this section.  
(Ref.: 40 CFR 63.457(l)(2))

5.B.56 For the Kraft pulping condensates to be treated biological treatment system, a compliance methodology shall be developed and maintained for (A) initial and continuous compliance with 40 CFR 63.446(c)(3) in Appendix C; and (B) initial and continuous compliance with 40 CFR 63.446(e)(2) and (4) in Appendix D. Notification for alternate compliance methodologies shall be made to the MDEQ thirty (30) days in advance of an anticipated change in methodology. (Ref: APC-S-6, Section III.A.3.c(1))

5.B.57 For Emission Point-041, the permittee shall assure compliance with opacity limitations by: (1) performing weekly observations on the exhaust stack. If

opacity is observed to be above 10%, then the permittee shall perform an EPA Reference Method 9 test for opacity. All weekly observations and Method 9 tests shall be kept in log form for three years for inspection by OPC personnel. (2) Performing monthly inspections on the baghouse and any associated maintenance Records of these inspections and associated maintenance shall be kept in log form for three years for inspection by OPC personnel. (Federally Enforceable Permit to Construct for the Prevention of Significant Deterioration Authority issued on June 13, 1989, and modified September 2, 2008).

- 5.B.58 For Emission Points AA-003, AA-005, AA-006, and AA-007, the permittee shall comply with the compliance assurance monitoring (CAM) requirements set forth in 40 CFR Part 64, as found in Appendix D of this permit. Specifically, the permittee shall conduct required monitoring and recordkeeping in accordance with 64.7 through 64.9.

5.B.59 The table below summarizes the CAM plan for Emission Point AA-003, the lime kiln with scrubber for PM.

	Indicator No. 1	Indicator No. 2
Indicator	Scrubber liquid flow rate	Scrubber pressure differential
Measurement Approach	The facility operates a continuous monitoring system to record scrubbing liquid flow rate.	The facility operates a continuous monitoring system to record gas (scrubber) pressure differential.
Monitoring Methods and Location	Continuous monitoring, as stipulated in 40 CFR 63 Subpart MM.	Continuous monitoring, as stipulated in 40 CFR 63 Subpart MM.
Indicator Range	<p>Minimum Liquid flow rate of 1,135 gallons per minute, as determined during the initial performance test.</p> <p>An exceedance is defined as occurring when a 3-hr average exceeds the indicator range as defined in 40 CFR 63.864(k)(ii).</p>	<p>Minimum Scrubber pressure differential of 20.9 inches of water as determined during the initial performance test.</p> <p>An exceedance is defined as occurring when a 3-hr average exceeds the indicator range as defined in 40 CFR 63.864(k)(ii).</p>
Data Collection Frequency	Continuous (Once every 15 minutes for purposes of averaging)	Continuous (once every 15 minutes for purposes of averaging)
Averaging Period	3 hours	3 hours
Recordkeeping	Data is recorded continuously	Data is recorded continuously
QA/QC	Monitoring devices will be calibrated and maintained as specified in 40 CFR 63 Subpart MM	Monitoring devices will be calibrated and maintained as specified in 40 CFR 63 Subpart MM

5.B.60 The table below summarizes the CAM plan for Emission Point AA-005, the recovery boiler with ESP for PM.

	Indicator
Measurement Approach	Opacity
Monitoring Method and Location	Continuous opacity monitoring
Indicator Range	10 consecutive 6-min averages in excess of 20%
Data Collection Frequency	Continuous (once every successive 10 second period)
Averaging Period	6-minutes
Recordkeeping	Data is recorded continuously
QA/QC	Monitoring device will be calibrated as specified in 40 CFR 63 Subpart MM



5.B.61 The following table summarizes the CAM plan for Emission Point AA-006, the Power Boiler with scrubber for PM

	Indicator No. 1	Indicator No. 2
Indicator	Scrubber liquid flow rate	Gas (scrubber) pressure differential
Measurement Approach	The scrubber liquid flow rate will be measured daily, using a flow meter.	Gas pressure differential will be measured daily, using pressure differential device.
Monitoring Methods and Location	Measurements are made at the scrubber.	Measurements are made at the scrubber.
Indicator Range	Maintain liquid flow rate at or above the most recent performance test. An excursion is defined as any deviations of less than 80% of the indicator range as established in the most recent performance test.	Maintain at a minimum the pressure drop established during the most recent performance test. An excursion is defined as any deviations of less than 90% of the indicator range as established in the most recent performance test.
Data Collection Frequency	Daily	Daily
Averaging Period	N/A	N/A
Recordkeeping	Data is recorded daily	Data is recorded daily
QA/QC	Monitoring devices will be calibrated once per year as specified by manufacturer.	Monitoring devices will be calibrated once per year, as specified by manufacturer.

5.B.62 The following table summarizes the CAM plan for Emission Point AA-007, the Smelt Dissolving Tank with scrubber to meet PM.

	Indicator No. 1	Indicator No. 2
Indicator	Scrubber liquid flow rate	Fan amperage
Measurement Approach	The scrubber liquid flow rate is measured on a continuous basis.	The fan amperage is measured on a continuous basis.
Monitoring Methods and Location	Continuous monitoring, as stipulated in 40 CFR 63 Subpart MM.	Continuous monitoring, as stipulated in 40 CFR 63 Subpart MM.
Indicator Range	Liquid flow rate at a minimum of 203 gallons per minute, as determined during the initial performance test.  An exceedance is defined as occurring when a 3-hr average exceeds the indicator range.	Fan amperage at a minimum of 127 amps, as determined during the initial performance test.  An exceedance is defined as occurring when a 3-hr average exceeds the indicator range.
Data Collection Frequency	Once every 15 minutes	Once every 15 minutes
Averaging Period	3 hours	3 hours
Recordkeeping	Data is recorded continuously	Data is recorded continuously
QA/QC	Monitoring device will be calibrated as specified in 40 CFR 63, Subpart MM.	Monitoring device will be calibrated as specified in 40 CFR 63, Subpart MM.

C. Specific Reporting Requirements

5.C.1 The permittee shall file written reports summarizing all deviations, including upsets, as described in Condition 1.24 and 5.A.5 which create excessive emissions or create emissions not normally released without treatment. Upset reports should include, but not be limited to, reports such as:

- (a) Noncondensable gas system venting.
- (b) Recovery boiler precipitator outages.
- (c) Miscellaneous equipment outages which cause excessive emissions (including shutdown and startup).

The reports shall be filed for each calendar quarter and each report shall be due within thirty (30) working days following the end of the reporting period. (Ref: APC-S-6, Section III.A.3.c(1))

5.C.2. The permittee shall report for each calendar quarter the periods of emission which exceed the TRS limits specified above from the recovery boiler and lime kiln. The report shall specify the 12-hour period of each exceedance by time and date, the average emission concentration for the period, and the total number of 12-hour periods of mill operation during the quarter. The report shall also detail all outages of the monitoring devices by time and date. The report shall be due within thirty (30) days following the end of the calendar quarter. (Ref: APC-S-6, Section III.A.3.c(1))

5.C.3. For Emission Points AA-010, & AA-011, the permittee shall submit semi-annual reports summarizing the emission points hours of operation for each day and each consecutive 365-day period to the MDEQ. The report shall be submitted in accordance with condition 5.A.4. (Ref: APC-S-6, Section III.A.3.c(1))

5.C.4. The permittee shall notify MDEQ in writing whenever the temporary package boilers are removed. (Ref: APC-S-6, Section III.A.3.c(1))

5.C.5. The permittee shall comply with the reporting requirements of 40 CFR Part 63, Subpart A and all of the reporting requirements listed in Table 1 of Part 63, Subpart S)

5.C.6. For Emission Points AA-033, AA-034 , AA-037, AA-038, and IA -001, the permittee is also subject to and shall comply with the notification and recordkeeping requirement as given in 40 CFR 60, Subpart A - General Provisions.

- 5.C.6 For stack test reporting and protocols, the permittee shall submit the following notifications, information, and reports for each required performance test on or before the date(s) specified in Section 5.B of this document:
- (a) For MACT subject emission sources, a notification of the intent to conduct a performance test must be submitted to the MDEQ sixty (60) calendar days prior to the intended test date or as otherwise specified in 40 CFR 63.7(b) and the applicable subpart. For all other emissions sources, a notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so that an observer may be afforded the opportunity to witness the test(s).
  - (b) For all required testing, the permittee shall submit a written test protocol at least thirty (30) days prior to the intended test date(s) to ensure that all test methods and procedures are acceptable to the MDEQ. For emission sources subject to a MACT standard, the test plan must be submitted sixty (60) days prior to the intended test date and meet the requirements of 40 CFR 63.7(c)(2).
  - (c) After the first successful submittal of a written test protocol, the permittee may request that the submittal of a testing protocol be waived for subsequent testing by certifying in writing at least thirty (30) days prior to the subsequent testing that all conditions for testing remain unchanged such that the original protocol can and will be followed.
  - (d) The permittee shall submit the results of all required emissions testing in the units specified by the limitations set forth in section 3.B of this document. Note, for VOC emissions testing conducted in accordance with EPA Reference methods 25 or 25A, the permittee must convert the emissions results, measured “as carbon” to the equivalent standard as VOC emissions.
  - (e) The permittee shall submit the results, in summary, of any periodic and/or parametric monitoring.
  - (f) The performance test results must be submitted to MDEQ within sixty (60) days following completion of the performance test.
- 5.C.7 For Emission Points AA-003, AA-005, and AA-007, the permittee must submit all applicable notifications from 40 CFR 63, Subpart A as detailed in 40 CFR 63.860, Table 1. (See Appendix E of this document to review the regulation) (Ref.: 40 CFR 63.867(a))

- 5.C.8 For Emission Points AA-003, AA-005, and AA-007, the permittee shall submit a semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in Section 3.D.1 of this document in accordance with Condition 5.A.4 for the most recent semiannual period. (Ref.: 40 CFR 63.866(b) and 63.867(c))
- 5.C.9 The owner or operator of any affected source or process unit must submit the applicable notifications from:
- (a) Subpart A of Title 40, Part 63, Subpart MM, as specified in Table 1 of Subpart MM.
  - (b) Additional reporting requirements for HAP metals standards listed below:
    - (1) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PM emissions limits in Section 63.862(a)(1)(ii) must submit the PM emissions limits determined in Section 63.865(a) for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln to the EPA for approval. The emissions limits must be submitted as part of the notification of compliance status required under subpart A of Title 40, Part 63, Subpart MM.
    - (2) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PM emissions limits in Section 63.862(a)(1)(ii) must submit the calculations and supporting documentation used in Section 63.865(a)(1) and (2) to the EPA as part of the notification of compliance status required under subpart A of Title 40, Part 63, Subpart MM.
    - (3) After the EPA has approved the emissions limits for any process unit, the owner or operator of a process unit must notify the EPA before any of the actions in paragraphs (i) through (iv) of this section are taken:
      - (i) The air pollution control system for any process unit is modified or replaced;
      - (ii) Any kraft or soda recovery furnace, smelt dissolving tank, or lime kiln in a chemical recovery system at a kraft or soda pulp mill complying with the PM emissions limits in Section 63.862(a)(1)(ii) is shut down for more than 60 consecutive days;

- (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed; or
    - (iv) The black liquor solids firing rate for any kraft or soda recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.
  - (c) An owner or operator of a group of process units in a chemical recovery system at a mill complying with the PM emissions limits in Section 63.862(a)(1)(ii) and seeking to perform the actions in paragraph (b)(3)(i) or (ii) of this section must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in paragraph (b)(2) of this section to the EPA. All modified PM emissions limits are subject to approval by the EPA. (Ref: 40 CFR 63.867 (a) and (b)).
- 5.C.10 Excess emissions report. The owner or operator must report quarterly if measured parameters meet any of the conditions specified in paragraph (c)(1) or (2) of Section 63.864. This report must contain the information specified in Section 63.10(c) of this part as well as the number and duration of occurrences when the source met or exceeded the conditions in Section 63.864(c)(1), and the number and duration of occurrences when the source met or exceeded the conditions in Section 63.864(c)(2). Reporting excess emissions below the violation thresholds of Section 63.864(c) does not constitute a violation of the applicable standard.
- 5.C.11 When no exceedances of parameters have occurred, the owner or operator must submit a semiannual report stating that no excess emissions occurred during the reporting period.
- (a) The owner or operator of an affected source or process unit subject to the requirements of Subpart MM and Subpart S of this part may combine excess emissions and/or summary reports for the mill. (Ref: 40 CFR 63.867(c)).
- 5.C.12 For Emission Points AA-003, AA-005, AA-006, and AA-007, the permittee shall submit summary reports of the monitoring performed to satisfy applicable MACT requirements. These reports shall include a summary of the number, durations, and causes of excursions and exceedances and the corrective actions taken; as well as of the monitor downtime incidents. This report shall be submitted in accordance with Condition 5.A.4 of this permit and in compliance with 40 CFR 64.9(a). (Ref: 40 CFR 64.9(a)) (40 CFR 63.867.10(d)(5), 40 CFR 63.867.10 (e) all MACT sources; 40 CFR 63.867(c) MACT II; and 40 CFR 63.7550 (c) Boiler MACT)

## SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

## SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at <http://ecfr.gpoaccess.gov> under Title 40, or DEQ shall provide a copy upon request from the permittee.

- 7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.
- 7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.
- 7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:
  - (a) All containers in which a class I or class II substance is stored or transported;
  - (b) All products containing a class I substance; and
  - (c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.
- 7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:
  - (a) Servicing, maintaining, or repairing appliances;
  - (b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or
  - (c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons



selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

- 7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.
- 7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:
- (a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;
  - (b) Any person disposing of halons;
  - (c) Manufacturers of halon blends; or
  - (d) Organizations that employ technicians who service halon-containing equipment.

## APPENDIX A

### List of Abbreviations Used In this Permit

APC-S-1	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
APC-S-2	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
APC-S-3	Regulations for the Prevention of Air Pollution Emergency Episodes
APC-S-4	Ambient Air Quality Standards
APC-S-5	Regulations for the Prevention of Significant Deterioration of Air Quality
APC-S-6	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
APC-S-7	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards For Hazardous Air Pollutants, 40 CFR 61
	or
	National Emission Standards For Hazardous Air Pollutants for Source Categories, 40 CFR 63
NM VOC	Non-Methane Volatile Organic Compounds
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter less than 10 $\Phi$ m in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

# **APPENDIX B**

**40 CFR 63 Subpart S**

**Standards for Hazardous Air Pollutants from the Pulp and Paper Industry**

# **APPENDIX C**

**40 CFR 63 Subpart MM  
National Emission Standards for Hazardous Air Pollutants  
for Chemical Combustion Sources at Kraft, Soda, Sulfite,  
and Stand-Alone Semichemical Pulp Mills.**