STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Leaf River Cellulose, LLC
157 Buck Creek Road
New Augusta, Mississippi 39462
Perry 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: NOV 2 3 2009

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires: October 31, 2014 **Permit No.: 2200-00005**

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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.)

(b) 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.)

(c) 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.)

(d) 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; and

(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-001	Woodyard (WY). The woodyard contains facilities, processes, and equipment for long wood and short log handling, debarking, chipping, and chip screening. Both soft and hardwood are processed in the woodyard. Purchased chips and bark are also handled in the woodyard. The woodyard includes the following significant sources of emissions from log handling, chipping, transfer, and storage activities: Chipper Building (WY-3) Scalping/Screening Building (WY-4) Pine Chip Piles (WY-5) Hardwood Chip Piles (WY-6) Screening Building (WY-7) Bark Shredders (WY-8) Debarker (WY-11) Purchased Chip Unloading (WY-12) Purchased Bark Unloading (WY-13) Chip Silo (WY-15) Roadways (WY-17)
AA-005	190 MMBTU/hr Natural Gas-Fired Package Boiler (UT-19) constructed in 1983 and used for steam production.
AA-006 and AA-007	Kraft Pulp Mill Area (PM), including the Digester and Brownstock Washer Systems. Wood chips are digested to make pulp and further processed into brownstock. The pulp mill area includes the following significant sources of emissions from equipment such as digesters, tanks, steamer, condensers, washers, and knotters: Contaminated Condensate Flash Tank (PM-3) Chip Bin Vent Scrubber Effluent Tank (PM-6) Screened Wood Chips Feed Chip Bin (PM-7) Pulp Sample Device (PM-8) White Liquor ***(WL)*** Draining Vessel (PM-9) Weak Black Liquor ***(BL)*** Spill Tank (PM-12) Filter Feed Tanks (PM-13, PM-14) Liquor Spill Sump (PM-15a) Pulp Mill Sewer Sump (PM-15b) BL Filters (PM-16) Filtered Weak BL Tank (PM-17, PM-18) Fiber Tank Overflow Vent (PM-19) Turpentine Decanter (PM-20) Turpentine Storage Tank (PM-21) Turpentine Unloading System (PM-22) Diffuser Filtrate Tank No.1 (PM-23) Unscreened HD Storage Tank (PM-24) Knot Drainer (PM-25) Filtrate Tank No. 2 (PM-26) Knot Drainer Trash Container (PM-27) Brown Stock Washer (PM-28) BSW Filtrate Tank (PM-29) Knots and Rejects Tank (PM-30) Brown Stock Decker Hood Exhaust (PM-31) Decker Filtrate Seal Tank (PM-32) Softwood Unbleached HD Storage (PM-33) Hardwood Unbleached HD Storage (PM-34) Tertiary Screen Rejects Drainer (PM-35) Primary Screen Feed Tank (PM-36) Primary Screen Rejects Tank (PM-37) Secondary Screen Rejects Chest (PM-38) Tertiary Screen Accepts Chest (PM-39) Digesters (PM-40) Knot Recycle Conveyor (PM-41) WL Sampler (PM-42) 2 Defoamer Tanks (PM-43) BL Filter Knotters Pressure Diffusion Washer
AA-008	Kraft Mill Multi-Stage Bleaching Process (BP) and Chlorine Dioxide Generation (ER). Brown stock is bleached by sending it through a multi-stage bleaching sequence utilizing different chemicals and operating conditions in each stage. Emissions are controlled by two (2) packed-tower fume scrubbers. The multi-stage bleaching process area includes the following significant sources of emissions:

Emission Point	Description
	Unbleached Stock Blend Chest (BP-1) First Stage Tower (BP-2) First Stage Washer (BP-3) First Stage Seal Chest (BP-4) First NaOH Oxygen Peroxide Tower (BP-5) First E(op) Washer venting to BP-19 (BP-6) First E(op) Seal Chest (BP-7) Second ClO2 Tower (BP-8) Second ClO2 Washer (BP-9) Second ClO2 Seal Chest (BP-10) First NaOH Peroxide Extraction (BP-11) Second Ep Washer (BP-12) Second Ep Seal Chest (BP-13) Third ClO2 Tower (BP-14) Third ClO2 Washer (BP-15) Third ClO2 Seal Chest (BP-16) No. 1 Bleached HD Storage Chest (BP-17) No. 2 Bleached HD Storage Chest (BP-18) First Stage ClO2 Scrubber (BP-19) ClO2 Gas Scrubber (BP-20) Methanol Storage Tank (ER-1) ClO2 Tail Gas Scrubber (ER-2) No. 1 Exhaust Fan (ER-3) No. 2 Exhaust Fan (ER-4) Roof Vent Fan (ER-5) Wall Vent Fans (ER-6 through ER-11) ClO2, Caustic, and Sodium Chlorate Tanks
AA-009	Pulp Drying Process (PD). Bleached pulp from the high density storage towers is dried through a series of slushers, the fourdrinier dryer, felt rollers, and the air borne dryer. The pulp drying process area includes the following significant sources of emissions: Blend Chest (PD-1) Machine Chest (PD-2) Broke Chest (PD-3) Slusher Exhaust (PD-4) Fourdrinier Exhaust No. 1, 2 (PD-5, PD-6) Low Vacuum Blower (PD-8) 3 Ceiling Exhaust Fans (PD-9 – PD-11) Dryer Exhaust Fan No. 1, 2 (PD-12, PD-13) Pulp Dryer Vacuum System (PD-14 – PD-16)
AA-010	Evaporators/Tall Oil Process (EV). Weak black liquor ***(BL)*** is concentrated to increase solid contents using multiple-effect evaporators. Soap and sulfuric acid are combined to convert the soap to tall oil. The process area includes the following significant sources of emissions: Tall Oil Reactor Scrubber (EV-1) No. 1, 2 Tall Oil Soap Tanks (EV-5, EV-6) Soap Collection Foam Breaker Tank (EV-7) Soap Collection Overflow Tank (EV-7a) Soap Collection Tank (EV-8) Soap Storage Tank (EV-9) No. 1 Weak BL Tank (EV-10) No. 1 Weak BL Foam Breaker Tank (EV-11) Weak BL Soap Tank (EV-12) No. 2 Soap Foam Weak BL Tank (EV-13) Weak BL Soap Overflow Tank (EV-14) No. 2, 3, and 4 Weak BL Tank (EV-15, 16, 16a) No. 3 Weak BL Soap Overflow Tank (EV-17) No. 3 Weak BL Foam Breaker Tank (EV-18) No. 3 Weak BL Soap Tank (EV-19) Brine Neutralization Tanks (EV-20) Brine Receivers (EV-21) No. 1 and No. 2 Decanters (EV-22, EV-23) Weak BL Filter Rejects Standpipe (EV-24) Soap Skimmer Tank (EV-25) Soap Skimmer Standpipe (EV-26) Hogging Ejector (EV-27) No. 1, 2 Heavy BL Tanks (EV-29, EV-30) Foul Condensate Tank (EV-31) BL Sampler (EV-33) BL Loading (EV-34) Tall Oil Soap Loading (EV-35) Multiple-Effect Evaporators (EV-36) Steam Stripper (EV-STR)
AA-011	1612.5 MMBTUH Recovery Boiler constructed in 1983 and used as a cyclone furnace. The recovery boiler combusts black liquor, natural gas, propane, and ultra-low sulfur diesel fuel and is equipped with an electrostatic precipitator (UT-9).
AA-012	Smelt Dissolving Tank equipped with a cyclonic scrubber (UT-7). The smelt dissolving tank is used to dissolve smelt from the recovery furnace.

Emission Point	Description
AA-013	138.6 MMBTU/hr Lime Kiln constructed in 1983 and used to convert lime mud ($CaCO_3$) from the recausticizing process to CaO for reuse. The Lime Kiln is equipped with an electrostatic precipitator that vents to a Venturi scrubber (RC-6). *Note: The Lime Kiln is a control device for both low volume, high concentration (LVHC) and high volume, low concentration (HVLC) non-condensable gas (NCG).*
AA-014	Recausticizing Area (RC). The main function of the recausticizing area is to causticize green liquor with reburned lime to form white liquor ***(WL)*** for the next cooking cycle. The recausticizing area includes the following sources of emissions (except RC-6 and RC-22): #1 Lime Slaker Scrubber Vent (RC-1) #2 Lime Slaker Scrubber Vent (RC-2) Lime Mud Pressure Filter Vent (RC-3) WL Pressure Filter Vent (RC-4) Lime Mud Filter Hood (RC-5), vents to RC-7 Lime Mud Filter Hood Vent Scrubber (RC-7) Emergency Dump (RC-9) No. 1, 2 WL Storage Tanks (RC-15a, RC-15b) Precoat Filter Vacuum Exhaust (RC-16) Precoat Filtrate Level Tank (RC-17) Swing Tank/Weak Wash Tank (RC-19) Scrubber Re-circulating Tank (RC-20) Kiln Bypass Atmospheric Vent (RC-21) White Liquor Unloading (RC-25) Polymer Storage Tank (RC-30) Waste Oil Tank (RC-31) Causticizers (RC-32) Lime Kiln Back-Up Diesel Engine (RC-34) Mud Storage Agitator Diesel Engine (RC-35)
AA-015	642 MMBTU/hr Power Boiler constructed in 1983 and used for steam production. The boiler is equipped with an electrostatic precipitator (UT-3). *Note: The Power Boiler is a designated control device for the HVLC NCG.*
AA-016	31.5 MMBTU/hr Incinerator constructed in 1994 and used to incinerate NCGs. The incinerator is equipped with a SO_2 absorption tower (RC-22). *Note: The incinerator is a control device for both HVLC and LVHC NCG.*
AA-018	Oxygen Delignification Process. The oxygen delignification process includes the following significant sources of emissions: Magnesium Sulfate Handling System (Ref. No. 02D-1) WL Oxidizer (02D-2) Brown Stock Feed Chute (02D-3) Filtrate Storage Tank (02D-5)
AA-021	Oxygen Delignification Process No. 2 Oxygen Reactor Blowtube (Ref. No. 02D-4)
AA-023	Oxygen Delignification Process Atmospheric Diffusion Washer (Ref. No. 02D-6)
AA-024	10.0 MMBTU/hr Propane-Fired Boiler (UT-18) constructed in 1983 and used for steam production.
AA-025	Kraft Pulping Process Low Volume High Concentration (LVHC) System. LVHC emission streams are controlled by the Lime Kiln (AA-013) or NCG incinerator (AA-016), and the rectified methanol is burned in the NCG incinerator or Lime Kiln. The Kraft Pulping Process LVHC system includes the following equipment (MACT 40 CFR 63 definition): *Digester System Vents.* The digester system consists of continuous digester(s), flash tank(s), blow tank(s), chip steamer(s) not using fresh steam, blow heat recovery accumulator(s), relief gas condenser(s), and prehydrolysis unit(s) preceding the pulp washing system. Digesters (PM-40) *Turpentine Recovery System Vents.* The turpentine recovery system consists of condenser(s), decanter(s), and storage tank(s) used to recover turpentine from digester system gases. Condensate Recovery Pot No. 1 and No. 2 (PM) No. 2 Flash Tank (PM-11) Turpentine Decanter Underflow Tank (PM-20)

Emission Point	Description
	Foul Condensate Storage (PM) Chip Bin (PM) Turpentine Condenser (PM) *Evaporator System Vents.* The evaporator system consists of the multi-effect evaporators, associated condenser(s), and hotwell(s). Foul Condensate Storage (EV-31) Multiple-Effect Evaporators (EV-36) *Steam Stripper System.* The steam stripper system consists of the steam stripper(s), stripper feed tank(s), condenser(s), heat exchanger(s), rectifier(s), condenser(s), decanter(s), and storage tank(s) associated with any methanol rectification process. Steam Stripper (EV-STR)
AA-026	Kraft Pulping Process High Volume Low Concentration (HVLC) System. HVLC emission streams are controlled by the Lime Kiln (AA-013) or NCG incinerator (AA-016). The Kraft Pulping Process HVLC system includes the following equipment (MACT 40 CFR 63 definition): *Knotter System.* The knotter system consists of equipment where knots, oversized material, or pieces of uncooked wood are removed from the pulp slurry after the digester system and prior to the pulp washing system. The knotter system equipment includes the knotter, knot drainer tanks, ancillary tanks, and any other equipment serving the same function as those previously listed. Knot Drainer (PM-25) Knots and Rejects Tank (PM-30) *Screen System.* The screen system consists of equipment used to remove oversized particles from the pulp slurry prior to the papermaking system washed stock storage. Primary Screen Feed Tank (PM-36) Primary Screen Rejects Tank (PM-37) Secondary Screen Rejects Chest (PM-38) Tertiary Screen Accepts Chest (PM-39) *Pulp Washing System Vents.* The pulp washing system consists of vacuum drum washers, intermediate stock chest(s), and their associated vacuum pump(s), filtrate tank(s), and foam breaker(s) or tank(s). The pulp washing system ***does not*** include deckers, screens, knotters, stock chests, or pulp storage tanks following the last stage of pulp washing. Knotter (PM) Acid Cleaning of Digestors (PM-44) *Decker System.* The decker system consists of all equipment used to thicken the pulp slurry or reduce its liquid content after the pulp washing system and prior to high-density pulp storage. The decker system includes decker vents, filtrate tanks, associated vacuum pumps, and any other equipment serving the same function as those previously listed. Diffuser Filtrate Tank (PM-23) Pressure Diffusion Washer (PM) Filtrate Tank No. 2 Overflow (PM-26) Brown Stock Washer (PM-28) BSW Filtrate Tank (PM-29) *Oxygen Delignification System.* The oxygen delignification system consists of the equipment that uses oxygen to remove lignin from pulp after high-density storage and prior to the bleaching system. The oxygen delignification system equipment includes the blow tank, washers, filtrate tanks, any interstage pulp storage tanks, and any other equipment serving the same function as those previously listed. Magnesium Sulfate Handling System (02D-1)

Emission Point	Description
	White Liquor Oxidizer (02D-2) Brown Stock Feed Chute (02D-3) No. 2 Oxygen Reactor Blowtube (02D-4 and *Emission Point AA-021*) Filtrate Storage Tank (02D-5) Atmospheric Diffusion Washer (02D-6 and *Emission Point AA-023*)
AA-027	Kraft Mill Bleaching System. The bleaching system consists of all process equipment after high-density pulp storage prior to the first application of oxidizing or reducing chemicals following the pulping system, up to and including the final bleaching stage (MACT 40 CFR 63 definition). The Kraft mill bleaching system includes the following equipment: First Stage Tower (BP-2) First Stage Washer (BP-3) First Stage Seal Chest (BP-4) Second ClO2 Tower (BP-8) Second ClO2 Washer (BP-9) Second ClO2 Seal Chest (BP-10) Third ClO2 Tower (BP-14) Third ClO2 Washer (BP-15) Third ClO2 Seal Chest (BP-16) First Stage ClO2 Scrubber (BP-19) ClO2 Gas Scrubber (BP-20)
AA-028	Kraft Pulping System Process Condensates. The Kraft pulping system process condensates includes the following equipment (MACT 40 CFR 63 definition): No. 1 and No. 2 Steam Condensate Strippers No. 1 Evaporator Fifth Effect No. 1 Evaporator Surface Condenser No. 2 Evaporator Primary Turpentine Condenser Turpentine Decanter Underflow *LVHC Collection System Condensates:* The LVHC collection system consists of the gas collection and transport system used to convey gases from LVHC sources to a control device. *HVLC Collection System Condensates:* The HVLC collection system consists of the gas collection and transport system used to convey gases from HVLC sources to a control device.
AA-030	25,000 Gallon Methanol Aboveground Storage Tank (ER-1) constructed in 1983 and located in the Bleaching Process (BP) area.
AA-033	Paint Distilling Operation (Reference No. MS-5)
AA-034	Painting Operations (Reference No. MS-11)
AA-035	Wastewater Collection and Treatment Operations (WW). Wastewater generated from the mill is treated using an activated sludge process. Treated water is discharged through the NPDES permitted outfall and includes various clarifiers, lift stations, ponds/basins, wastewater tanks, reactors, filters, lime dust collector (WW-16), and chemical treatment tanks (e.g., caustic, acid, anhydrous ammonia, alum, and polymer).
AA-036	Petroleum Coke Operation. The petroleum coke operation includes the ground petroleum coke silo. The petroleum coke silos (2) are each equipped with a baghouse to control particulate matter emissions during unloading.
AA-037	Diesel Powered Fire Pump (MS-9), Lime Kiln Back-Up Diesel Engine (RC-34), Back-Up Effluent Pump, and Back-Up Dump Tank Agitator Drive (RC-35)

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) listed below:

(a) Startup operations may produce emissions, which exceed 40% opacity for up to fifteen (15) minutes per startup in any one(1) hour, and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing 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	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
Entire Facility	NESHAP, Subpart S 40 CFR 63.440(a)	3.B.1	HAP	The facility is subject to and shall comply with 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.
	NESHAP, Subpart MM 40 CFR 63.860(a)	3.B.2	HAP Metals	The facility is subject to and shall comply with 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 Semi-chemical Pulp Mills
	NSPS, Subpart BB 40 CFR 60.280-285	3.B.3	TRS	The facility is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of New Source Performance Standard (NSPS), Subpart BB - Standards of Performance for Kraft Pulp Mills
	NSPS, Subpart D 40 CFR 60.40-60.46	3.B.4	PM/ NO_X	The facility is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction commenced after August 17, 1971.
AA-001	APC-S-1, Section 3.6(a)	3.B.5	PM/PM_{10}	$E = 4.1p^{0.67}$
AA-005	APC-S-1, Section 3.4(a)(2)	3.B.6	PM/PM_{10}	$E = 0.8808 * I^{-0.1667}$

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-005	APC-S-1, Section 4.1(a)	3.B.7	SO_2	4.8 lbs/MMBTU
AA-005	Permit to Construct (PTC) issued November 23, 1993	3.B.8(a)	PM/PM_{10} SO_2 NO_X CO VOC	0.92 lbs/hr 0.11 lbs/hr 38.0 lbs/hr 7.2 lbs/hr 0.53 lbs/hr
AA-005	PTC issued November 23, 1993.	3.B.8(b)	Hours of Operation	The permittee shall not operate Emission Point AA-005 simultaneously with AA-011 and AA-015 for more than 1,000 hours per year (on a 365-day rolling total).
AA-005	PTC issued November 23, 1993.	3.B.8(c)	Fuel Restriction	Fuels other than natural gas or propane are prohibited.
AA-006, AA-007, & AA-010	NSPS, Subpart BB 40 CFR 60.280-285	3.B.3	TRS	Emission Points AA-006, AA-007, and AA-010 are subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS, Subpart BB - Standards of Performance for Kraft Pulp Mills
AA-006, AA-007, & AA-010	NSPS, Subpart BB 40 CFR 60.283(a)(1)	3.B.9(a)	TRS	Total reduced sulfur (TRS) is limited to 5 ppm by volume on a dry basis corrected to 10% oxygen unless: 1. Exhaust gases are combusted in the Lime Kiln (AA-013) in accordance with 40 CFR 60.283(a)(5); or 2. Exhaust gases are combusted in the incinerator (AA-016) or other combustion device (AA-015) and subjected to a minimum temperature of 1200 · F for at least 0.5 second.
AA-010	40 CFR 64 (CAM)	3.B.9(b)	Scrubber Flow Rate	Monitor scrubber flow rate.
AA-008 & AA-009	Refer to requirements in AA-027 and AA-028.			
AA-011	APC-S-1, Section 3.4(a)(2)	3.B.6	PM/PM_{10}	$E = 0.8808 * I^{-0.1667}$, when burning fossil fuels.
AA-011	APC-S-1, Section 4.1(a)	3.B.7	SO_2	4.8 lbs/MMBTU
AA-011	NSPS, Subpart BB 40 CFR 60.280 - 285	3.B.3	Opacity, PM, and TRS	Emission Point AA-011 is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS, Subpart BB.
AA-011	NSPS, Subpart BB 40 CFR 60.282(a)(1)(ii) and 40 CFR 60.284(e)(1)(ii)	3.B.10(a)	Opacity	≤ 35% Periods of excess emissions shall not exceed 35% for 6% or more of the operating time within any quarterly period.
AA-011	NESHAP, Subpart MM 40 CFR 63.864(k)(2)(i)	3.B.10(b)	Opacity	≤ 35% Periods of excess emissions shall not exceed 35% for 6% or more of the operating time within any quarterly period.
AA-011	NSPS, Subpart BB 40 CFR 60.282(a)(1)(i) APC-S-1, Section 3.5	3.B.10(c) 3.B.10(d)	PM/PM_{10} PM/PM_{10}	0.044 gr/dscf (0.10 g/dscm) corrected to 8% oxygen. 4 lbs/ton of equivalent air-dried Kraft pulp.
AA-011	NSPS, Subpart BB 40 CFR 60.283(a)(2) and 60.284(e)(ii)	3.B.10(e)	TRS	5 ppm by volume on a dry basis corrected to 8% oxygen; and periods of excess emissions shall not exceed 1% of the operating time within any quarterly period.
AA-011	Prevention of Significant Deterioration (PSD) PTC issued January 12, 1982	3.B.10(f)	SO_2	300 ppm corrected to 8% oxygen

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-011	PSD PTC issued July 14, 1992	3.B.10(g)	NO_X	110 ppm corrected to 8% oxygen (8-hr average)
AA-011	PSD PTC issued April 9. 1991	3.B.10(h)	CO	300 ppm corrected to 8% oxygen (8-hr average)
AA-011	PSD PTC issued July 14, 1992	3.B.10(i)	Fuel Restriction	Black liquor is the primary fuel, but natural gas, propane, and diesel fuel can be used as auxiliary fuel.
AA-011	PSD PTC issued July 14, 1992	3.B.10(j)	Fuel Restriction	The fossil fuel annual capacity factor shall be 10% or less when combusting natural gas and propane.
AA-011	NESHAP, Subpart MM 40 CFR 63.862(a)(1)(i) or 40 CFR 63.862(a)(1)(ii)	3.B.10(k) 3.B.11(b)	HAP Metals (as PM)	0.044 gr/dscf (0.10 g/dscm) corrected to 8% oxygen; or as established in accordance with the provisions of 40 CFR 63.862(a)(1).
AA-012	APC-S-1, Section 3.6(a)	3.B.5	PM/PM_{10}	$E = 4.1p^{0.67}$
AA-012	APC-S-1, Section 4.2(a)	3.B.12	SO_2	500 ppm
AA-012	NSPS, Subpart BB 40 CFR 60.280 - 285	3.B.3	PM/ TRS	Emission Point AA-012 is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS, Subpart BB.
AA-012	APC-S-1, Section 4.2(b)	3.B.13(a)	H_2S	1 grain per 100 standard cubic feet
AA-012	NSPS, Subpart BB 40 CFR 60.282(a)(2)	3.B.13(b)	PM/PM_{10}	0.2 lbs/ton Black Liquor Solids (dry weight)
AA-012	PSD Permit to Construct issued April 9, 1991	3.B.13(c)	SO_2	36 ppm in stack gas
AA-012	NSPS, Subpart BB 40 CFR 60.283(a)(4)	3.B.13(d)	TRS	0.033 lbs/ton Black Liquor Solids (measured as H_2S)
AA-012	NESHAP, Subpart MM 40 CFR 63.862(a)(1)(i) or 40 CFR 63.862(a)(1)(ii)	3.B.13(e) 3.B.11(b)	HAP Metals (as PM)	0.2 lbs/ton Black Liquor Solids fired; or as established in accordance with the provisions of 40 CFR 63.862(a)(1)(ii).
AA-012	NESHAP, Subpart MM 40 CFR 63.864(k)(2)(iii)	3.B.11(a)	Parametric Monitoring	There shall not be 6 or more parametric monitoring values based on a 3-hour average that are outside of the parameters established during the initial compliance demonstration required by 40 CFR 63.865 and 63.864(j) within any 6-month reporting period.
AA-013	APC-S-1, Section 4.2(a)	3.B.12	SO_2	500 ppm
AA-013	NSPS, Subpart BB 40 CFR 60.280 - 285	3.B.3	PM/TRS	Emission Point AA-013 is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS, Subpart BB.
AA-013	NSPS, Subpart BB 40 CFR 60.282(a)(3)	3.B.14(a) and 3.B.14(b)	PM/PM_{10}	0.066 gr/dscf (0.15 g/dscm) corrected to 8% oxygen, when *gaseous* fossil fuel is burned. 0.13 gr/dscf (0.30 g/dscm) corrected to 10% oxygen, when *liquid* fossil fuel is burned.
AA-013	PSD PTC issued January 12, 1982 modified in PSD PTC issued January 28, 2005	3.B.14(c)	SO_2	17.5 lbs/hr and 76.9 tons/year
AA-013	NSPS, Subpart BB 40 CFR 60.283(a)(5) PSD PTC issued March 28, 1995, and May 3, 2002	3.B.14(d)	TRS	8 ppm corrected to 10% oxygen, not to exceed 2.81 lbs/hr and 12.3 TPY

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-013	PSD PTC issued April 8, 2008	3.B.14(e)	NO_X	122 lbs/hr and 534.2 TPY
AA-013	PSD PTC issued January 12, 1982, modified in PSD PTC issued January 28, 2005	3.B.14(f)	CO	50.0 lbs/hr and 220.0 TPY
AA-013	PSD PTC issued January 28, 2005 and modified September 29, 2005. PTC issued May 3, 2002.	3.B.14(g) 3.B.14(h)	Fuel Restriction	Natural gas, propane, No. 6 fuel oil, on-site generated used oil, petroleum coke, and tall oil is authorized for use as fuel. NCGs controlled by the Lime Kiln also have a fuel value. Maximum annual fuel usage rate of 10,000 gallons per year of on-site generated used oil.
AA-013	NESHAP, Subpart MM 40 CFR 63.862(a)(1)(i); or 40 CFR 63.862(a)(1)(ii)	3.B.14(i) 3.B.11(b)	HAP Metals (as PM)	0.064 gr/dscf (0.15 g/dscm) corrected to 10% oxygen; or as established in accordance with the provisions of 40 CFR 63.862(a)(1)(ii).
AA-013	NESHAP, Subpart MM 40 CFR 63.864(k)(2)(ii)	3.B.14(j)	Opacity	≤ 20% Periods of excess emissions shall not exceed 20% for 6% or more of the operating time within any quarterly period.
AA-013	NESHAP, Subpart MM 40 CFR 63.864(k)(2)(iii)	3.B.11(a)	Parametric Monitoring	There shall not be 6 or more parametric monitoring values based on a 3-hour average that are outside of the parameters established during the initial compliance demonstration required by 40 CFR 63.865 and 63.864(j) within any 6-month reporting period.
AA-013	PTC issued May 3, 2002	3.B.14(k)	Control Device	The Lime Kiln shall not operate without the use of the scrubber.
AA-013	40 CFR 64 (CAM)	3.B.14(l)	Scrubber Flow Rate	Monitor scrubber flow rate.
AA-014	APC-S-1, Section 3.6(a)	3.B.5	PM/PM_{10}	$E = 4.1p^{0.67}$
AA-015	NSPS, Subpart D 40 CFR 60.40 – 46 40 CFR 64 (CAM)	3.B.15(a)	PM/NO_X Opacity/Voltage	Emission Point AA-015 is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators. This emission point is also subject to the continuous assurance monitoring (CAM) requirements, 40 CFR 64.
AA-015	NSPS, Subpart D 40 CFR 60.42(a)(1) APC-S-1, Section 3.4(b) APC-S-1, Section 3.4(a)(2)	3.B.15(b) 3.B.15(c) 3.B.6	PM/PM_{10} PM/PM_{10} PM/PM_{10}	0.10 lb/MMBTU heat input from *fossil fuel and/or wood residue.* 0.30 gr/dscf $E = 0.8808 * I^{-0.1667}$, when burning fossil fuels
AA-015	PSD PTC issued March 28, 1995 NSPS, Subpart D 40 CFR 60.43(a)(1) APC-S-1, 4.1(a)	3.B.15(d) 3.B.7	SO_2	20 lbs/hr, not to exceed 0.80lb/MMBTU heat input derived from *liquid fossil fuel and wood residue fuel*. 4.8 lbs/MMBTU
AA-015	PSD PTC issued January 12, 1982, and revised February 22, 1983 NSPS, Subpart D 40 CFR 60.44(a)(1)	3.B.15(e)	NO_X	0.20 lb/MMBTU heat input derived from *gaseous fossil fuel, liquid fossil fuel, and wood residue*.
AA-015	PSD PTC issued March 28 1995	3.B.15(f)	CO	338.4 lbs/hr

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-015	NSPS, Subpart D 40 CFR 60.42(a)(2)	3.B.15(g)	Opacity	≤ 20% except for one 6-minute period per hour of not > 27%.
AA-016	APC-S-1, Section 3.8(a)	3.B.16(a)	PM/PM_{10}	0.2 gr/dscf corrected to 12 % CO_2
AA-016	PTC issued August 9, 1994	3.B.16(b)	NO_X	9.0 lbs/hr and 39.42 tons/year
AA-016	PTC issued August 9, 1994	3.B.16(c)	CO	22.0 lbs/hr and 96.36 tons/year
AA-016	APC-S-1, Section 4.2(a) PTC issued August 9, 1994	3.B.12 3.B.16(d)	SO_2 SO_2	500 ppm 9.0 lbs/hr and 39.42 tons/year
AA-016	NSPS, Subpart BB 40 CFR 60.283(a)(1) PTC issued August 9,1994	3.B.16(e) 3.B.16(f)	TRS TRS	5 ppm by volume on a dry basis corrected to 10% oxygen and subjected to a minimum temperature of 1200 · F for at least 0.5 second, not to exceed 2.1 lbs/hr and 9.2 tons/year
AA-016	PTC issued August 9, 1994	3.B.16(g)	Fuel Restriction	Fuels other than natural gas, propane, or NCGs are prohibited. NCGs controlled by the Incinerator also have a fuel value.
AA-016	40 CFR 64 (CAM)	3.B.16(h)	Scrubber Flow Rate	Monitor scrubber flow rate.
AA-021	PTC issued September 26, 1995	3.B.17(a)	CO	19.3 lbs/hr and 84.5 tons/year
AA-021	PSD PTC issued September 26, 1995	3.B.17(b)	VOC	37.8 lbs/hr and 165.4 tons/year
AA-023	PSD PTC issued September 26, 1995	3.B.18	VOC	8.1 lbs/hr and 35.5 tons/year
AA-021 & AA-023	Refer to requirements in AA-025 and AA-026, where applicable.			
AA-024	APC-S-1, Section 3.4(a)(2)	3.B.6	PM/PM_{10}	$E = 0.8808 * I^{-0.1667}$, when burning fossil fuels
AA-024	APC-S-1, Section 4.1(a)	3.B.7	SO_2	4.8 lbs/MMBTU
AA-025	NESHAP, Subpart S 40 CFR 63.443(a), (b), & (c) 40 CFR 63.453(k)	3.B.19(a)	HAP	All equipment shall be enclosed, vented into a closed vent system, and routed to a control device. Closure and vent system inspections and monitoring as required by AA-027.
AA-025	NESHAP, Subpart S 40 CFR 63.443(d)(2) & (d)(4)(i)	3.B.19(b)	HAP	1. Control HAPs by venting emissions to the lime kiln (AA-013) or power boiler (AA-015) flame zone by use of a steam injector; or 2. Control HAPs by using the incinerator (AA-016) where the total HAP concentration at the outlet is reduced to 20 ppm or less by volume, corrected to 10% oxygen on a dry gas basis.
AA-025 & AA-026	NESHAP, Subpart S 40 CFR 63.443(e)	3.B.19(c)	HAP	Periods of excess emissions for total process operating time in a semi-annual period (excluding periods of startup, shutdown, or malfunction) from the control device(s) used to reduce total HAP emissions shall not exceed 1% from the LVHC system, 4% from the HVLC system, and 4% from both the LVHC and HVLC systems.
AA-025, AA-026, & AA-027	NESHAP, Subpart S 40 CFR 63.450 & 63.457	3.B.19(d)	HAP	Each enclosure and closed-vent system shall meet the requirements specified by 40 CFR 63.450.
AA-026	NESHAP, Subpart S 40 CFR 63.447	3.B.19(e)	HAP	Permittee shall comply with the Clean Condensate Alternative (CCA) as detailed in AA-028 requirements.

Emission Point	Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard
AA-027	NESHAP, Subpart S 40 CFR 63.445(b) & (c)(2)	3.B.20(a)	HAP	Bleaching system equipment shall be enclosed and routed to a control device in which the total chlorinated HAP emissions excluding (chloroform) shall be reduced to 10 ppm or less by volume.
AA-027	NESHAP, Subpart S 40 CFR 63.445(d)(1)(ii)	3.B.20(b)	HAP	Reduce chloroform air emissions to the atmosphere by compliance with the applicable effluent limitation guidelines and standards specified in 40 CFR 430.
AA-027	NESHAP, Subpart S 40 CFR 63.453(k)	3.B.20(c)	HAP	Closure and vent system inspections and monitoring.
AA-028	NESHAP, Subpart S 40 CFR 63.446(b) & (c)(3) 40 CFR 63.447	3.B.21(a)	HAP	MACT I, Phase 1 (Collection) - Pulping process condensates that contain a total HAP mass of 11.1 lbs/ton of Oven-Dried Pulp (ODP) from 85% of the total HAP in the condensate streams being collected on a 15-day rolling average and shall be collected and treated in accordance with 40 CFR 63.446(d) & (e).
AA-028	NESHAP, Subpart S 40 CFR 63.446(d)	3.B.21(b)	HAP	The pulping process condensates shall be conveyed in a closed collection system as specified in 40 CFR 63.446(d)(1) & (2).
AA-028	NESHAP, Subpart S 40 CFR 63.446(e)(5)	3.B.21(c)	HAP	MACT I, Phase 1 (Treatment) - Pulping process condensates shall be treated to remove at least 10.2 lbs/ton ODP of total HAP on a 15-day rolling average.
AA-028	NESHAP, Subpart S 40 CFR 63.446(f)	3.B.21(d)	HAP	All equipment shall be enclosed with emissions collected and vented to a control device. 1. Control HAPs by venting emissions to the lime kiln (AA-013) or power boiler (AA-015) flame zone by use of a steam injector; or 2. Control HAPs by using the thermal oxidizer/incinerator (AA-016) where the total HAP concentration at the outlet is reduced to 20 ppm or less by volume, corrected to 10% oxygen on a dry gas basis.
AA-028	NESHAP, Subpart S 40 CFR 63.446(g)	3.B.21(e)	HAP	MACT I, Phase 1 - Periods of excess emissions shall not be considered violations provided that the time of excess emissions does not exceed 10% of the total process operating time.
AA-028	NESHAP, Subpart S 40 CFR 63.443(a)(1)(iii)&(v) 40 CFR 63.446(d)	3.B.21(f)	HAP	MACT I, Phase 2 (Collection) - Pulping process condensates that contain a total HAP mass of at least 2.0 lbs/ton ODP from 15% of the total HAP in the condensate streams being collected on a 15-day rolling average.
AA-028	NESHAP, Subpart S 40 CFR 63.443(a)(1)(iii)&(v) 40 CFR 63.446(e)(5)	3.B.21(g)	HAP	MACT I, Phase 2 (Treatment) - Pulping process condensates shall be treated to remove at least 1.8 lbs/ton ODP of total HAP on a 15-day rolling average.
AA-028	NESHAP, Subpart S 40 CFR 63.446(e)(2)	3.B.21(h)	HAP	MACT I, Phase 2 - Periods of excess emissions reported under 40 CFR 455 shall not be considered violations provided that the time of excess emissions does not exceed 4% of the total process operating time.
AA-036	PSD PTC issued January 28, 2005, modified September 29, 2005.	3.B.22(a) 3.B.22(b)	PM/PM_{10} Operational Limitation	1.6 lbs/hr and 7.1 TPY The baghouse must be operated at all times the ground petroleum coke silo is operated.
AA-014, AA-037, & Entire Facility	NESHAP, Subpart ZZZZ 40 CFR 63.6585, 63.6645(h), & 63.6590(b)	3.B.23	HAP	The facility is subject to NESHAP, Subpart ZZZZ - Standards for Hazardous Air Pollutants from Stationary Reciprocating Internal Combustion Engines (RICE); however, the source(s) listed in the permit application are not subject to the requirements of Subpart A or ZZZZ, except for the initial notification requirements of §63.6645(h).

3.B.1 This 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 This facility is subject to and shall comply with all applicable requirements, limitations, and any subsequent revisions of the NESHAP, Subpart MM - Standards for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semi-chemical Pulp Mills. (Ref.: 40 CFR 63.860(a))

3.B.3 The facility, specifically Emission Points AA-006, AA-007, AA-010, AA-011, AA-012, and AA-013, is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of New Source Performance Standard (NSPS), Subpart BB - Standards of Performance for Kraft Pulp Mills. (Ref.: 40 CFR 60.280 through 60.285)

3.B.4 The facility, specifically Emission Point AA-015, is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction commenced after August 17, 1971. (Ref.: 40 CFR 60.40 through 60.46)

3.B.5 The permittee shall not cause, permit, or allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = 4.1\ p^{0.67}$, 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))

3.B.6 For Emission Points AA-005, AA-011, AA-015, and AA-024, the maximum permissible emission of ash and/or PM when burning fossil fuels shall not exceed an emission rate as 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. (Ref.: APC-S-1, Section 3.4(a)(2))

3.B.7 For Emission Points AA-005, AA-011, AA-015, and AA-024, the maximum discharge of sulfur oxides (SO_2) 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 or as otherwise specified herein. (Ref.: APC-S-1, Section 4.1(a))

3.B.8 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-005

(a) For Emission Point AA-005, the permittee shall be limited to the emissions limitations specified in Table 3.B, which were established in a Federally Enforceable Permit to Construct (PTC) issued on November 23, 1993. (Ref.: PTC issued on November 23, 1993)

(b) The permittee shall not operate Emission Point AA-005 simultaneously with Emission Points AA-011 and AA-015 for more than 1,000 hours per year based on a 365-day rolling total. Non-simultaneous operation means that either Emission Point AA-011 or AA-015 must be completely inoperable during the applicable time period. (Ref.: PTC issued on November 23, 1993)

(c) For Emission Point AA-005, fuels other than natural gas or propane are prohibited. (Ref.: PTC issued on November 23, 1993)

3.B.9 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-006, AA-007, and AA-010

(a) For Emission Points AA-006, AA-007, and AA-010, discharge of total reduced sulfur (TRS) gases produced from the digester system, the brown stock washer system, or the multiple-effect evaporator system must not exceed 5 parts per million (ppm) by volume on a dry gas basis, corrected to 10 percent (10%) oxygen unless:

(1) The gases are combusted in the Lime Kiln (AA-013) while operated in accordance with 40 CFR 60.283(a)(5); or

(2) The gases are combusted in the incinerator (AA-015) or other combustion device (AA-016) and subjected to a minimum temperature of 1200 ·F for at least 0.5 second. (Ref.: 40 CFR 60.283(a)(1))

(b) For Emission Point AA-010, the permittee shall comply with the compliance assurance monitoring (CAM) requirements. (Ref.: 40 CFR 64)

3.B.10 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-011

(a) For Emission Point AA-011, the permittee shall not discharge into the atmosphere any gases that exhibit greater than 35 percent (35%) opacity (6-minute average) or greater. In addition, periods of excess opacity emissions shall not exceed 35% for 6 percent (6%) or more of the operating time within any quarterly period. (Ref.: 40 CFR 60.282(a)(1)(ii) and 40 CFR 60.284(e)(1)(ii))

(b) For Emission Point AA-011, periods of excess opacity emissions shall not exceed 35% for 6% or more of the operating time within any quarterly period. (Ref.: 40 CFR 63.864(k)(2)(i))

(c) For Emission Point AA-011, the permittee shall not discharge into the atmosphere any gases, which contain PM in excess of 0.044 gr/dscf (0.10 g/dscm) corrected to 8 percent (8%) oxygen. (Ref.: 40 CFR 60.282(a)(1)(i))

(d) For Emission Point AA-011, the emissions of PM from a recovery furnace stack shall not exceed four (4) pounds per ton of equivalent air-dried Kraft pulp produced at any given time. (Ref.: APC-S-1, Section 3.5)

(e) For Emission Point AA-011, the permittee shall not cause to be discharged into the atmosphere from any straight Kraft recovery furnace gases which contain TRS in excess of 5 parts per million (ppm) by volume on a dry basis, corrected to 8% oxygen. In addition, periods of excess TRS emissions shall not exceed 1% of the operating time within any quarterly period. (Ref.: 40 CFR 60.283(a)(2) and 40 CFR 60.284(e)(ii))

(f) For Emission Point AA-011, SO_2 emissions shall not exceed 300 ppm corrected to 8% oxygen as established in the Federally Enforceable PSD Permit to Construct issued on January 12, 1982.

(g) For Emission Point AA-011, nitrogen oxide (NO_X) emissions shall not exceed 110 ppm corrected to 8% oxygen based on an 8-hour average as established in the Federally Enforceable PSD Permit to Construct issued on July 14, 1992.

(h) For Emission Point AA-011, carbon monoxide (CO) emissions shall not exceed 300 ppm corrected to 8% oxygen based on an 8-hour average as established in the Federally Enforceable PSD Permit to Construct issued on April 9, 1991.

(i) For Emission Point AA-011, the permittee is authorized to burn natural gas or propane as auxiliary fuel as established in the Federally Enforceable PSD Permit to Construct issued on July 14, 1992. For Emission Point AA-011,the permittee is also authorized to combust ultra-low sulfur diesel fuel.

(j) For Emission Point AA-011, the natural gas, propane, and fuel oil annual capacity factor shall be 10% or less per calendar year, as established in the Federally Enforceable PSD Permit to Construct issued on July 14, 1992. Note, the criteria for calculation of the annual capacity factor are set forth in 40 CFR 60.44b(d). The annual capacity factor shall be defined as the ratio between the actual heat input to the boiler from coal, oil, or natural gas/propane during a calendar year, and the potential heat input to the boiler had it been operated 8760 hours at the maximum steady state design heat input.

(k) The permittee shall not discharge into the atmosphere any gases from the existing Kraft recovery furnace (AA-011), which contain a concentration of PM in excess of 0.044 gr/dscf (0.10 g/dscm) corrected to 8% oxygen. As an alternative to this emission limitation, the permittee may establish PM emission limits for the recovery furnace in accordance with 40 CFR 63.862(a)(1)(ii). (Ref.: 40 CFR 63. 862(a)(1)(i))

3.B.11 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-011, AA-012, AND AA-013

(a) For Emission Points AA-012 and AA-013, there shall not be 6 or more recorded parametric monitoring values based on a 3-hour average that are outside of the parametric ranges established during the initial compliance demonstration as required by 40 CFR 63.865 and 63.864(j) within any 6-month reporting period. The established parametric ranges may be revised during any subsequent

compliance testing. (Ref.: 40 CFR 63.862(a)(1)(i))

(b) For Emission Points AA-011, AA-012, and AA-013, as an alternative to meeting the requirements of 40 CFR 63.862(a)(1)(i), the permittee may establish PM emissions limits for each existing Kraft recovery furnace, smelt dissolving tank, and lime kiln that operates more than 6,300 hours per year by:

(1) Establishing an overall PM emission limit for each existing process unit in the recovery system at the mill using the methods set forth in 40 CFR 63.865(a)(1) & (2);

(2) The emission limits for each recovery furnace, smelt dissolving tank, and lime kiln that are used to establish the overall PM limit must not be less stringent than the emissions limitations required by 40 CFR 60.282.

(3) The permittee must ensure that the particulate matter emissions discharged to the atmosphere from each existing recovery furnace, smelt dissolving tank, and lime kiln are less than or equal to the applicable particulate matter emissions limits, established using the methods outlined in 40 CFR 63.865(a)(1). (Ref.: 40 CFR 63.862(a)(1)(ii))

3.B.12 For Emission Points AA-012, AA-013, and AA-016, the permittee shall not cause or permit the emission of gas containing sulfur oxides, measured as SO_2, in excess of 500 ppm (volume). (Ref.: APC-S-1, Section 4.2(a))

3.B.13 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-012

(a) For Emission Point AA-012, the permittee shall not cause or permit the emission of any gas stream that contains hydrogen sulfide (H_2S) in excess of one (1) grain per 100 standard cubic feet. (Ref.: APC-S-1, Section 4.2(b))

(b) For Emission Point AA-012, the permittee shall not discharge into the atmosphere any gases, which contain PM in excess of 0.2 lbs/ton (0.1 g/kg) black liquor solids by dry weight. (Ref.: 40 CFR 60.282(a)(2))

(c) For Emission Point AA-012, SO_2 emissions shall not exceed 36 ppm in the stack gas as established in the Federally Enforceable PSD Permit to Construct issued on April 9, 1991.

(d) For Emission Point AA-012, the permittee shall not cause to be discharged into the atmosphere from any smelt dissolving tank any gases which contain TRS in excess of 0.033 lb/ton (0.016g/kg) black liquor solids measured as H_2S. (Ref.: 40 CFR 60.283(a)(4))

(e) The permittee shall not discharge into the atmosphere any gases from the existing smelt dissolving tank (AA-012), which contain a concentration of PM in the exhaust gases discharged to the atmosphere in excess of 0.20 lbs/ton (0.10 kg/Mg) of black liquor solids fired. As an alternative to this emission limitation, the

permittee may establish PM emission limitations in accordance with 40 CFR 63.862(a)(ii). (Ref.: 40 CFR 63. 862(a)(i)(B))

3.B.14 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-013

(a) For Emission Point AA-013, the permittee shall not cause to be discharged into the atmosphere from any lime kiln any gases which contain PM in excess of 0.066 gr/dscf corrected to 10% oxygen when *gaseous* fossil fuel is burned. (Ref.: 40 CFR 60.282(a)(3)(i))

(b) For Emission Point AA-013, the permittee shall not cause to be discharged into the atmosphere from any lime kiln gases which contain PM in excess of and 0.13 gr/dscf corrected to 10% oxygen when *liquid* fossil fuel is burned. (Ref.:40 CFR 60.282(a)(3)(ii))

(c) For Emission Point AA-013, SO_2 emissions shall not exceed 17.5 pounds per hour and 76.9 tons per year, as established in the Federally Enforceable PSD Permit to Construct issued January 12, 1982, and modified in PSD Permit to Construct issued January 28, 2005.

(d) For Emission Point AA-013, the permittee shall not cause to be discharged into the atmosphere from any lime kiln gases which contain TRS in excess of 8 ppm by volume on a dry basis, corrected to 10% oxygen, not to exceed 2.81pounds per hour and 12.3 tons per year. The lime kiln is a control device for low volume, high concentration and high volume, low concentration (LVHC/HVLC) process noncondensable gases. (Ref.: 40 CFR 60.283(a)(5), PSD Permit issued March 28, 1995, and PTC issued May 3, 2002.)

(e) For Emission Point AA-013, NO_X emissions shall not exceed 122 pounds per hour and 534.2 tons per year as established in the Federally Enforceable PSD Permit to Construct issued on April 8, 2008.

(f) For Emission Point AA-013, CO emissions shall not exceed 50.0 pounds per hour and 220.0 tons per year as established in the Federally Enforceable PSD Permit to Construct issued on January 28, 2005.

(g) For Emission Point AA-013, the permittee is authorized to burn natural gas, propane, No. 6 fuel oil, on-site generated used oil, petroleum coke, and tall oil as fuel. NCGs controlled by the Lime Kiln also have a fuel value. (Ref.: Established in the PSD Permit to Construct issued January 28, 2005, and modified September 29, 2005)

(h) For Emission Point AA-013, the permittee shall be limited to a maximum annual fuel usage rate of 10,000 gallons per year of on-site generated used oil as fuel. The on-site generated used oil combusted in the kiln must not contain hazardous waste. (Ref.: Established in PTC issued May 3, 2002)

(i) The permittee shall not discharge into the atmosphere any gases from the existing

Kraft lime kiln (Emission Point AA-013) which contain a concentration of PM in excess of 0.064 gr/dscf (0.15 g/dscm) corrected to 10% oxygen. As an alternative to this emission limitation, the permittee may establish PM emission limits for the lime kiln in accordance with 40 CFR 63.862(a)(1)(ii). (Ref.: 40 CFR 63.862(a)(1)(i)(C))

(j) For Emission Point AA-013, periods of excess opacity emissions shall not exceed 20% for 6% or more of the operating time within any quarterly period. (Ref.: 40 CFR 63.864(k)(2)(ii))

(k) The Lime Kiln shall not operate without the use of the scrubber as a control device. (Ref.: Established in PTC issued May 3, 2002)

(l) For Emission Point AA-013, the permittee shall comply with the compliance assurance monitoring (CAM) requirements. (Ref.: 40 CFR 64)

3.B.15 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-015

(a) Emission Point AA-015 is subject to and shall comply with all applicable requirements and limitations, and any subsequent revisions of NSPS Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for which construction commenced after August 17, 1971. The permittee is also subject to the continuous assurance monitoring (CAM) requirements, 40 CFR 64. (Ref.: 40 CFR 60.40 through 60.46 and 40 CFR 64)

(b) For Emission Point AA-015, the permittee shall not discharge into the atmosphere any gases, which contain PM in excess of 0.10 pound per million BTU heat input derived from *fossil fuel and/or wood residue*. Wood residue shall be defined as bark, sawdust, slabs, chips, mill trim, and other wood products derived from wood processing and forest management operations. (Ref.: 40 CFR 60.42(a)(1))

(c) For Emission Point AA-015, the permittee shall for combination fuel boilers be allowed to emit up to 0.30 grains per standard dry cubic feet of PM. (Ref.: APC-S-1, Section 3.4(b))

(d) For Emission Point AA-015, the permittee shall not discharge into the atmosphere any gases which contain SO_2 in excess of 20 pounds per hour, not to exceed 0.80 pound per million BTU heat input derived from *liquid fossil fuel and wood residue*. (Ref.: 40 CFR 60.43(a)(1) and PSD Permit to Construct issued March 28, 1995)

(e) For Emission Point AA-015, the permittee shall not discharge into the atmosphere any gases which contain NO_X in excess of 0.20 pound per million BTU heat input derived from *gaseous fossil fuel and wood residue*. (Ref.: 40 CFR 60.44(a)(1) and the PSD Permit to Construct issued January 12, 1982 and revised February 22, 1983)

(f) For Emission Point AA-015, CO emissions shall not exceed 338.4 pounds per

hour as established in the PSD Permit to Construct issued on March 28, 1995.

(g) For Emission Point AA-015, the permittee shall not discharge into the atmosphere any gases that exhibit greater than 20% opacity except for one 6-minute period per hour of not more than 27% opacity. (Ref.: 40 CFR 60.42(a)(2))

3.B.16 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-016

(a) For Emission Point AA-016, PM shall not exceed 0.2 grains per standard dry cubic foot of flue gas calculated to 12% carbon dioxide (CO_2) by volume for products of combustion. CO_2 produced by combustion of any auxiliary fuels shall be excluded from the calculation. This limitation shall apply when the incinerator is operating at design capacity. (Ref.: APC-S-1, Section 3.8(a))

(b) For Emission Point AA-016, NO_X emissions shall not exceed 9.0 pounds per hour and 39.42 tons per year as established in the Federally Enforceable Permit to Construct issued August 9, 1994.

(c) For Emission Point AA-016, CO emissions shall not exceed 22.0 pounds per hour and 96.36 tons per year as established in the Federally Enforceable Permit to Construct issued August 9, 1994.

(d) For Emission Point AA-016, SO_2 emissions shall not exceed 9.0 pounds per hour and 39.42 tons per year as established in the Federally Enforceable Permit to Construct issued August 9, 1994.

(e) For Emission Point AA-016, the permittee shall not cause to be discharged into the atmosphere gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10% oxygen and subjected to a minimum temperature of 1200 ·F for at least 0.5 second. Note, the incinerator is a control device for HVLC and LVHC NCG. (Ref.: 40 CFR 60.283(a)(1))

(f) For Emission Point AA-016, TRS emissions shall not exceed 2.1 pounds per hour and 9.2 tons per year as established in the Federally Enforceable Permit to Construct issued August 9, 1994.

(g) For Emission Point AA-016, fuels other than natural gas, propane, or NCGs are prohibited. NCGs controlled by the Incinerator also have a fuel value. (Ref.: Permit to Construct issued August 9, 1994)

(h) For Emission Point AA-016, the permittee shall comply with the compliance assurance monitoring (CAM) requirements. (Ref.: 40 CFR 64)

3.B.17 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-021

(a) For Emission Point AA-021, CO emissions shall not exceed 19.3 pounds per hour and 84.5 tons per year as established in the Federally Enforceable Permit to Construct issued September 26, 1995.

(b) For Emission Point AA-021, VOC emissions shall not exceed 37.8 pounds per hour and 165.4 tons per year on an "as carbon" basis as established in the Federally Enforceable PSD Permit to Construct issued September 26, 1995.

3.B.18 For Emission Point AA-023, VOC emissions shall not exceed 8.1 pounds per hour and 35.5 tons per year on an "as carbon" basis as established in the Federally Enforceable PSD Permit to Construct issued September 26, 1995.

3.B.19 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINTS AA-025, AA-026, AND AA-027

(a) For Emission Point AA-025, each equipment system shall be enclosed and vented into a closed-vent system and routed to a qualified control device. The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450. (Ref.: 40 CFR 63.443(a), (b), and (c))

(b) For Emission Point AA-025, the control device shall:

(1) Reduce total HAP emissions using the lime kiln (AA-013) or the power boiler (AA-015) by introducing the HAP emission stream into the flame zone by use of a steam injector; or

(2) Reduce total HAP concentration at the outlet of the thermal oxidizer (AA-016) to 20 ppm or less by volume, corrected to 10% oxygen on a dry basis. (Ref.: 40 CFR 63.443(d)(2) & (d)(4)(i))

(c) For Emission Points AA-025 and AA-026, periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of Conditions (a) or (b) 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 levels:

(1) 1% for control devices used to reduce the total HAP emissions from the LVHC system;

(2) 4% for control devices used to reduce the total HAP emissions from the HVLC system; and

(3) 4% for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems. (Ref.: 40 CFR 63.443(e))

(d) For Emission Points AA-025, AA-026, and AA-027 and each enclosure and closed vent system referenced (40 CFR 63.443(c) and 63.445(b)), the permittee shall meet the following requirements for capturing and transporting vent streams that contain HAPs:

(1) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). In addition, each enclosure or hood opening closed during the initial

performance test specified in Section 5 of this document and detailed 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.

(2) Each component of the closed-vent system used to comply with 40 CFR 63.443(c) & 63.445(b) that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm by volume above background, as measured by the procedures specified in 40 CFR 63.457(d).

(3) Each bypass line in the closed vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations specified in 40 CFR 63.443(c) & 63.445(b) shall comply with the following:

(i) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to the manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or

(ii) For bypass lines that are not computer controlled, the permittee shall maintain the bypass valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal. (Ref.: 40 CFR 63.450 and 457)

(e) For Emission Point AA-026, the permittee shall comply with the Clean Condensate Alternative (CCA) as referenced in the requirements for Emission Point AA-028. (Ref.: 40 CFR 63.447)

3.B.20 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-027

(a) For Emission Point AA-027, the bleaching system equipment, where chlorinated compounds are introduced, shall be enclosed and vented into a closed-vent system and routed to a control device in which the total chlorinated HAP emissions (excluding chloroform) shall be reduced such that a treatment device outlet concentration of 10 ppm or less by volume is achieved. The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450. (Ref.: 40 CFR 63.445(b) & (c)(2))

(b) For Emission Point AA-027, the permittee shall reduce chloroform air emissions to the atmosphere by compliance with the applicable effluent limitation guidelines and standards specified in 40 CFR 430, Paper Grade Kraft and soda bleaching systems and lines, 40 CFR 430.24(a)(1) and (e), and 40 CFR 430.26 (a) and (c).

(Ref.: 40 CFR 63.445(d)(1)(ii)

(c) For Emission Point AA-027, each enclosure and closed-vent system used to comply with §63.450(a) shall comply with the following requirements:

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in §63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

(2) Each closed-vent system required by §63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in §63.450(c) measured initially and annually by the procedures in §63.457(d).

(4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in §63.457(e).

(5) The valve or closure mechanism specified in §63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

(6) If an inspection required by paragraphs (1) through (5) identifies visible defects in ductwork, piping, enclosures or connections to covers required by §63.450, or if an instrument reading of 500 ppm by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.

(i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.

(ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the 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)

3.B.21 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-028

(a) For Emission Point AA-028, compliance with MACT I, Phase 1 pulping process condensates is demonstrated through the collection of those streams generated, produced, or associated with the equipment systems that in total HAP contain a total HAP mass of at least 11.1 pounds per ton of Oven-Dried Pulp (ODP) from 85% of the total HAP in the condensate streams being collected on a 15-day rolling average and shall be subject to the requirements listed below and specifically stated in 40 CFR 63.446(d) & (e). (Ref.: 40 CFR 63.446(b) and (c))

(b) For Emission Point AA-028, the pulping process condensates shall be conveyed in a closed collection system that is designed and operated to meet the following requirements:

(1) Closed vent systems and control devices shall be designed and operated to meet the individual drain system requirements as specified in 40 CFR 63.960, 63.961, and 63.962 of 40 CFR Part 63 Subpart RR except that closed vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.450 and 63.443(d) instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii); and

(2) If a condensate tank used in the closed collection system, the tank shall meet the following requirements:

(i) The fixed roof and all openings shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm above background, and vented into a closed-vent system that meets the requirements in 40 CFR 63.450, and routed to a control device that meets the requirements of 63.443(d); and

(ii) 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))

(c) For Emission Point AA-028, compliance with MACT I, Phase 1 pulping process condensates shall be treated to remove at least 10.2 pounds per ODP of total HAP on a 15-day rolling average. (Ref.: 40 CFR 63.446(e)(5))

(d) For Emission Point AA-028, each HAP removed from a pulping process condensate stream during treatment and handling shall be controlled as specified in 40 CFR 63.443(c) and (d). (Ref.: 40 CFR 63.446(f))

(e) For Emission Point AA-028 and each control device used to treat pulping process condensates under MACT I, Phase 1 to comply with the requirements of 40 CFR 63.446(e)(5), periods of excess emissions reported under 40 CFR 63.455 shall not be a violation of 40 CFR 63.446(d), (e)(3), and (f) provided that the time of excess emissions (including periods of startup, shutdown, and malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed 10%. (Ref.: 40 CFR 63.446(g))

(f) For Emission Point AA-028, compliance with the clean condensate alternative (CCA) under MACT I, Phase 2 shall be demonstrated through collection of those pulping condensate streams generated, produced, or associated with the equipment systems that in total contain a total HAP mass of at least 2.0 pounds per ODP from 15% of the total HAP in the condensate streams being collected on a 15-day rolling average basis. (Ref.: 40 CFR 63.443(a)(1)(iii) & (v) and 40 CFR 63.446(d))

(g) For Emission Point AA-028, compliance with the CCA under MACT I, Phase 2 shall be demonstrated through treatment of pulping condensate streams to remove at least 1.8 pounds per ODP of total HAP on a 15-day rolling average basis. (Ref.: 40 CFR 63.443(a)(1)(iii) & (v) and 40 CFR 63.446(e)(5))

(h) For Emission Point AA-028, periods of excess emissions reported under 40 CFR 63.455 for compliance with the treatment of MACT I, Phase 2 CCA pulping condensate streams shall not be a violation provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semiannual reporting period does not exceed 4%. (Ref.: 40 CFR 63.443(e)(2))

3.B.22 EMISSION LIMITATIONS AND STANDARDS FOR EMISSION POINT AA-036

(a) For Emission Point AA-036, PM/PM_{10} emissions shall not exceed 1.6 pounds per hour and 7.1 tons per year as established in the Federally Enforceable PSD Permit to Construct issued January 28, 2005, and modified September 29, 2005.

(b) The permittee is not authorized to operate the ground petroleum coke silo without the use of the baghouse. (Ref.: PSD PTC issued January 28, 2005, and modified September 29, 2005)

3.B.23 Emission Points AA-0014 and AA-037, and any other affected small stationary emergency diesel engines throughout the facility, are subject to NESHAP, Subpart ZZZZ - Standards for Hazardous Air Pollutants from Stationary Reciprocating Internal Combustion Engines (RICE); however, the affected source(s) do not have to meet the requirements of this subpart or Subpart A except for the initial notification requirements of §63.6645(h). (Ref.: 40 CFR 63.6590(b))

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	PM	0.6 lbs/MMBTU, or as otherwise limited by facility modification restrictions
APC-S-1, Section 4.1(a)	3.C.2	SO_2	4.8 lbs/MMBTU, or as otherwise limited by facility modification restrictions
APC-S-1, Section 3.6(a)	3.C.3	PM	$E = 4.1p^{0.67}$, or as otherwise limited by facility modification restrictions

3.C.1 The maximum permissible emission of ash and/or PM 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 SO_2) per million BTU heat input. (Ref.: APC-S-1, Section 4.1(a))

3.C.3 The permittee shall not cause, permit, or allow the emission of particulate matter (PM) in total quantities in any one hour from any manufacturing process, which includes any associated stacks, vents, outlets, or combination thereof, to exceed the amount determined by the relationship $E = 4.1\ p^{0.67}$, 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
Entire Facility	APC-S-6, Section III.A.3	3.D.1	Fugitive Dust	Quarterly (or as needed) Inspections, Maintenance, and Cleaning
AA-001	APC-S-6, Section III.A.3	3.D.2	Fugitive Dust	Paving, Surface Cleaning and Dust Suppression
AA-011, AA-012, & AA-013	NESHAP, Subpart MM 40 CFR 63.866(a)	3.D.3	Operations	The permittee must have and implement a written Startup, Shutdown and Malfunction Plan as described in 40 CFR 63.6(e)(3) and 63.866(a)(1) and (a)(2).
AA-011 & AA-013	NESHAP, Subpart MM 40 CFR 63.864(j) & (k)	3.D.4(a)	Opacity - Corrective Action	The permittee must implement corrective action, as specified in the required Startup, Shutdown and Malfunction Plan when opacity monitoring indicates that the average of 10 consecutive 6-minute averages result in a measurement greater than 20%.
AA-012 & AA-013	NESHAP, Subpart MM 40 CFR 63.864(j) & (k)	3.D.4(a)	Parameter Monitored - Corrective Action	The permittee must implement corrective action, as specified in the required Startup, Shutdown and Malfunction Plan when any 3-hour average parametric monitoring value is outside of the parameter values established in accordance with 40 CFR 63.864 and Section 5.B of this document.
AA-014	APC-S-6, Section III.A.3	3.D.5	Opacity	No visible emissions
AA-025, AA-026, AA-027, & AA-028	NESHAP, Subpart S 40 CFR 63.454(b)	3.D.6	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.

3.D.1 To prevent the generation of fugitive dust throughout the entire facility, the permittee shall conduct quarterly (or more frequently as needed) inspections, maintenance, and cleaning of the following areas: doors, silo hatches, diverter systems, transfer points, conveyor belts, screws, loaders, lime storage areas, or any other source of dust emissions. (Ref.: APC-S-6, Section III.A.3)

3.D.2 For Emission Point AA-001, the permittee shall employ appropriate combinations of paving, surface cleaning, and dust suppression to prevent the generation of fugitive dust in quantities sufficient to be visibly airborne off the plant property. These procedures should include but are not limited to the following practices:

(a) The handling and placing of chips, bark, or any other wood refuse must be performed in a manner to ensure that there is no airborne wood fiber loss outside the woodyard area.

(b) Monthly inspection of all accessible paved areas, storage piles, log handling, truck receiving, debarking, slashing, shredding, chipping, screening, wood fuel processing, and purchased chip/bark unloading areas to ensure equipment is functioning properly and to prevent buildup of fugitive dust. (Ref.: APC-S-6, Section III.A.3)

3.D.3 For Emission Points AA-011, AA-012, and AA-013, the permittee is required to have and implement a written Startup, Shutdown and Malfunction Plan as described in 40 CFR

63.6(e)(3). The plan must contain specific procedures to be followed for operation and maintenance of the affected sources 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. In addition to the requirements of in 40 CFR 63.6(e), the plan must include the following requirements as set forth in 40 CFR 63.866(a)(1) and (2):

(a) Procedures for responding to any process parameter level that is inconsistent with the level(s) established under 40 CFR 63.864(j), including:

(1) Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and

(2) Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance.

(b) The Startup, Shutdown, and Malfunction Plan also must include the following schedules:

(1) A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturers instructions and recommendations for routine and long term maintenance; and

(2) An inspection schedule for each continuous monitoring system required under 40 CFR 63.864, to ensure at least once in each 24-hour period, that each continuous monitoring system is properly functioning. (Ref.: 40 CFR 63.6(e)(3) & 40 CFR 63.866(a)).

3.D.4 The permittee shall be required to implement corrective action, as specified in the Startup, Shutdown, and Malfunction Plan detailed above when the following monitoring exceedances occur:

(a) For a Kraft Recovery Furnace or Lime Kiln 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%.

(b) For a Kraft Smelt Dissolving Tank or Lime Kiln equipped with a wet scrubber, when any 3-hour average parametric monitoring value is outside of the parameter values established in accordance with 40 CFR 63.864 and Section 5.B of this document. (Ref.: 40 CFR 63.864(j) and (k))

3.D.5 The permittee shall operate the causticizing plant (Emission Point AA-014) such that there are no visible emissions except water vapor. (Ref.: APC-S-6, Section III.A.3)

3.D.6 For Emission Points AA-025, AA-026, AA-027, and AA-028, 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 (e.g., 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(b))

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. The Semi-annual Reporting Periods shall be defined as January 1st through June 30th and July 1st through December 31st. 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

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
Entire Facility	Fugitive Dust	Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.	5.B.1	APC-S-6, Section III.A.3
AA-001	Fugitive Dust	Maintain records of all inspections, maintenance, and cleanings conducted in accordance with 3.D.	5.B.2	APC-S-6, Section III.A.3
AA-005	Operating Hours	Maintain daily records of the hours of operation. Calculate and record daily the hours of simultaneous operation with Emission Point AA-011 and AA-015 on a 365-day rolling total.	5.B.3(a) & 5.B.3(b)	PTC issued November 23, 1993
AA-005	Fuel Consumption	Maintain records monthly of the Annual Fuel Consumption Rate and calculate a 12-month rolling total for each fuel used.	5.B.3(c)	APC-S-6, Section III.A.3
AA-005	PM/PM_{10}, SO_2, NO_X, CO, and VOC	Stack test (once per permit period) within 18 months of the permit issuance date using appropriate EPA Reference Method(s).	5.B.3(d)	APC-S-6, Section III.A.3
AA-006, AA-007, & AA-010	TRS or Combustion Temperature	Maintain records of any occurrence of excess emissions from the digester system, brown stock washer system, multiple effect evaporator system, or condensate stripper system. Excess emissions shall be defined as set forth in 40 CFR 60.284(d)(3).	5.B.4(a)	40 CFR 60.284(d)(3)
AA-006, AA-007, & AA-010	Hours Vented to Controls	Maintain daily records of the amount of time the Lime Kiln (AA-013) and the amount of time the incinerator (AA-016) are used to combust TRS gases.	5.B.4(b)	APC-S-6, Section III.A.3
AA-011	Hours of Operation	Maintain daily records of the hours of operation.	5.B.5(a)	PTC issued November 23, 1993
AA-011	Fuel Usage	Maintain daily records of the amount of fossil fuel fired.	5.B.5(b)	PSD PTC issued July 14, 1992
AA-011	Heat Input	Maintain daily records of the actual heat input of fossil fuel (Natural Gas/Propane) to the Recovery Boiler.	5.B.5(c)	PSD PTC issued July 14, 1992
AA-011	Fossil Fuel	Maintain and record monthly a Fossil Fuel Annual Capacity Factor and calculated on a 12-month rolling average each calendar quarter.	5.B.5(d)	PSD PTC issued July 14, 1992
AA-011	Black Liquor Solids (BLS)	Record daily the BLS firing rate (tons/day) and calculate a 12-month rolling total.	5.B.5(e)	APC-S-6, Section III.A.3 40 CFR 63.866(c)(1)
AA-011	TRS	Maintain records of any occurrence of excess TRS emissions from the recovery furnace. Excess emissions shall be defined as 12-hour averages of TRS concentrations above 5 ppm by volume.	5.B.5(f)	40 CFR 60.284(d)(1)(i)
AA-011	Opacity	Monitor and record the opacity from the recovery furnace using a COMS. Maintain records of excess opacity emissions from the	5.B.5(g) 5.B.5(h)	40 CFR 60.284(a)(1) 40 CFR 60.284(d)(1)(ii)

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
		recovery furnace. Excess emissions shall be defined as all 6-minute average opacities that exceed 35%. The permittee must install, maintain, operate, and calibrate a COMS to record opacity every successive 10-second period and calculate and record each successive 6-minute average opacity using the procedures set forth in §§63.6(h) and 63.8.	5.B.5(i)	40 CFR 63.864(d)(1)
AA-011	Oxygen (O_2)	Maintain records of each time the O_2 warning alarm is triggered and record the steps taken to return the unit to optimum combustion conditions. The O_2 monitor(s) shall be maintained and calibrated in accordance with the manufacturer specifications.	5.B.5(j)	APC-S-6, Section III.A.3
AA-011	ESP Operation and Maint. Plan	Maintain an Operation and Maintenance (O&M) Plan for the electrostatic precipitator (ESP) control device.	5.B.5(k)	APC-S-6, Section III.A.3
AA-011	PM/PM_{10}, SO_2, TRS, NO_x, CO, and Opacity	Stack test biennially with the initial test occurring within 18 months of the permit issuance date. Testing shall be in accordance with the appropriate EPA Reference Methods.	5.B.5(l)	APC-S-6, Section III.A.3
AA-012	PM, SO_2, and TRS	Stack test biennially with the initial test occurring within 18 months of the permit issuance date. Testing shall be in accordance with the appropriate EPA Reference Methods.	5.B.6(a)	APC-S-6, Section III.A.3
AA-012	Scrubber Pressure Loss	Monitor and record the pressure loss of the gas stream through the control equipment (scrubber) utilizing a CMS. The monitoring device must be certified to an accuracy of ¶2 inches water gage pressure(¶500 Pascal's). The measurements obtained from the CMS should be recorded once per shift.	5.B.6(b)	40 CFR 60.284(b)(2)(i) & 40 CFR 60.284(c)(4)
AA-012	Scrubber Pressure Loss	Use a CMS for the scrubber to record pressure drop at least once every successive 15-minute period using the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(e). The monitoring device must be certified to an accuracy of ¶2 inches water gage pressure (¶500 Pascal's)	5.B.6(c)	40 CFR 63.864(e)
AA-012	Scrubber Flow Rate	Monitor and record the scrubbing liquid flow rate once per operating shift.	5.B.6(d)	APC-S-6, Section III.A.3
AA-013	PM/PM_{10}, SO_2, TRS, NO_X, CO, and Opacity	Stack test biennially with initial test occurring within 18 months of permit issuance date. Testing shall be in accordance with the appropriate EPA Ref. Methods.	5.B.7(a)	APC-S-6, Section III.A.3
AA-013	TRS	Maintain records of excess TRS emissions from the lime kiln. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 8 ppm.	5.B.7(b)	40 CFR 60.284(d)(2)
AA-013	CaO Production	Record daily the CaO production rate (in tons/day) and calculate on a 365-day rolling total.	5.B.7(c)	40 CFR 63.866(c)(2)
AA-013	Fuel Usage	Maintain records daily of the amount and type of fuel combusted.	5.B.7(d)	APC-S-6, Section III.A.3
AA-013	Used Oil Combusted and Analysis	Maintain records monthly of the amount of on-site generated used oil burned as fuel and maintain on a 12-month rolling total. Perform an annual chemical analysis of the on-site generated used oil to ensure that it is not a hazardous waste, and maintain records on-site.	5.B.7(d)	APC-S-6, Section III.A.3

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-013	Scrubber Flow Rate	Monitor and record the scrubbing liquid flow rate once per operating shift. Monitoring of the scrubbing liquid flow rate is an EPA approved alternative to monitoring pressure loss across the scrubber.	5.B.7(e)	40 CFR 60.284(b)(2)(i) 40 CFR 60.284(c)(4) 40 CFR 63.864(e)
AA-011, AA-012, & AA-013	HAP Metals (as PM)	Conduct performance testing to demonstrate compliance with the PM emission limitations as set forth in 40 CFR 63.862(a).	5.B.8(a)	40 CFR 63.864 APC-S-6, Section III.A.3
AA-011, AA-012, & AA-013	Parametric Monitoring	During performance testing, the permittee must establish operating ranges for the monitoring parameters specified in 40 CFR 63.864 as appropriate.	5.B.8(b)	40 CFR 63.864(k)
AA-011, AA-012, & AA-013	Corrective Actions	Maintain records of any occurrence when corrective action is required and when a violation is noted under 40 CFR 63.864(k).	5.B.8(c)	40 CFR 63.866(b)
AA-011, AA-012, & AA-013	Parametric Monitoring	Maintain records required by §63.10(b)(2) plus parameter monitoring data required under §63.864; all records and documentation of supporting calculations for compliance determinations made under §63.865(a)-(e); and records of any monitoring parameter ranges established for each affected source or process unit.	5.B.8(d)	40 CFR 63.10(b)(2) 40 CFR 63.864 40 CFR 63.865(a)-(e) 40 CFR 63.866(c)(3)-(5)
AA-011 & AA-013	TRS	Monitor and record the TRS concentration on a dry basis using a CMS.	5.B.8(e)	40 CFR 60.284(a)(2)
AA-011 & AA-013	TRS	Calculate and record on a daily basis, 12-hour average TRS concentrations from the recovery furnace and Lime Kiln for the two consecutive periods of each operating day. Calculations should be corrected to 8% by volume oxygen for the Recovery Furnace and 10% by volume oxygen for the Lime Kiln.	5.B.8(f)	40 CFR 60.284(c)
AA-011 & AA-013	O_2	Monitor and record the percent of O_2 by volume on a dry basis in the gases discharged into the atmosphere from the recovery boiler and lime kiln using a CMS.	5.B.8(g)	40 CFR 60.284(a)(2)
AA-011 & AA-013	O_2	Calculate and record daily the 12-hour average O_2 concentrations from the recovery furnace and lime kiln for the two consecutive periods of each operating day.	5.B.8(h)	40 CFR 60.284(c)
AA-012 & AA-013	Scrubbing Liquid Supply Pressure	Monitor and record the scrubbing liquid supply pressure to the control equipment utilizing a CMS once per shift. The monitoring device must be certified to an accuracy of ¶15% of the design scrubbing liquid supply pressure.	5.B.8(i)	40 CFR 60.284(b)(2)(ii) 40 CFR 60.284(c)(4)
AA-012 & AA-013	Scrubber Flow Rate	Monitor and record the scrubber flow rate utilizing a CMS at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 63.864(e). The monitoring device must be accurate to within ¶5% of the design scrubber flow rate.	5.B.8(j)	40 CFR 63.864(e)
AA-012, AA-013, AA-014, AA-016, AA-021, & AA-023	Opacity	Perform and maintain visible emissions inspections in accordance with a *tiered* inspection schedule.	5.B.9	APC-S-6, Section III.A.3
AA-015	PM, SO_2, NO_X, CO, and Opacity	Stack test biennially with initial test occurring within 18 months of permit issuance date. Testing shall be in accordance with the appropriate EPA Ref. Methods.	5.B.10(a)	APC-S-6, Section III.A.3
AA-015	Opacity	Install, calibrate, maintain, and operate a CMS to measure and record opacity.	5.B.10(b)	40 CFR 60.45(a) & (c)(3)

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-015	Opacity	Maintain records of excess opacity emissions. Excess emissions shall be defined as a 6-minute period during which the average opacity of emissions exceeds 20%, except that one 6-minute average per hour of up to 27% opacity need not be reported.	5.B.10(c)	40 CFR 60.45(g) & (l)
AA-015	ESP O&M Plan	Maintain an O&M Plan for the ESP (control device).	5.b.10(d)	APC-S-6, Section III.A.3
AA-015	Fuel Usage	Maintain daily records of the amount(s) and type(s) of fuel combusted.	5.B.10(e)	APC-S-6, Section III.A.3
AA-015	Hours of Operation	Maintain daily records of the hours of operation.	5.B.10(f)	PTC issued November 23, 1993
AA-015	Hours of NCG Incineration	Maintain daily and 12-month rolling total records of the hours of NCG incineration.	3.B.10(g)	APC-S-6, Section III.A.3
AA-015	O_2	Monitor and record the percent of O_2 (on a dry basis) utilizing the O_2 monitor prior to the ESP. The O_2 monitor shall be maintained and calibrated in accordance with manufacturer specifications.	5.B.10(h)	APC-S-6, Section III.A.3
AA-015	O_2	Calculate and record the 12-hour average O_2 concentrations for the two consecutive periods of each operating day.	5.B.10 (i)	APC-S-6, Section III.A.3
AA-016	SO_2, TRS, NO_X, CO, and Opacity	Stack test biennially with the initial test occurring within 18 months of the permit issuance date. Testing shall be in accordance with the appropriate EPA Reference Methods.	5.B.11(a)	APC-S-6, Section III.A.3
AA-016	Combustion Temperature	Monitor and record the combustion temperature at the point of incineration of effluent gases. The monitoring device is to be certified to be accurate within ¶1 percent of the temperature being measured.	5.B.11(b)	40 CFR 60.284(b)(1)
AA-016	Combustion Temperature	Maintain records of any period in excess of 5 minutes during which the combustion temperature at the point of incineration is less than 1200º F.	5.B.11(c)	40 CFR 60.284(d)(3)(ii)
AA-016	Fuel Usage	Maintain daily records of the amount(s) and type(s) of fuel combusted.	5.B.11(d)	APC-S-6, Section III.A.3
AA-016	Hours of Operation	Maintain daily records of the hours of operation.	5.B.11(e)	APC-S-6, Section III.A.3
AA-016	Hours of NCG Incineration	Maintain daily and 12-month rolling total records of the hours of NCG incineration.	5.B.11(f)	APC-S-6, Section III.A.3
AA-016	TRS	Maintain records of excess TRS emissions from the incinerator. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 5 ppm by volume.	5.B.11(g)	40 CFR 60.284(d)(3)
AA-021	CO, VOC, and Opacity	Stack test biennially with the initial test occurring within 18 months of the permit issuance date. Testing shall be in accordance with the appropriate EPA Reference Methods.	5.B.12	APC-S-6, Section III.A.3
AA-023	VOC and Opacity	Stack test biennially with the initial test occurring within 18 months of the permit issuance date. Testing shall be in accordance with the appropriate EPA Reference Methods.	5.B.12	APC-S-6, Section III.A.3
AA-024	Hours of Operation	Maintain daily records of the hours of operation.	5.B.13	APC-S-6, Section III.A.3

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
AA-025 & AA-027	Enclosure & Closed-Vent System	Conduct, record, and maintain enclosure and closed-vent system inspections.	5.B.14(a)	40 CFR 63.453(k)
AA-025, AA-026, AA-027, & AA-028	Alternative Parameter Monitoring	If the permittee elects to use a control device, technique, or an alternative parameter other than those specified in this Section, the permittee must obtain prior approval from MDEQ.	5.B.14(b)	40 CFR 63.453(m)
AA-025, AA-026, AA-027, & AA-028	Operating Parameters	The permittee may reestablish the value for each operating parameter as detailed in 40 CFR 63.453(n).	5.B.14(c)	40 CFR 63.453(n)(1)-(n)(4)
AA-025, AA-026, AA-027, & AA-028	Control Device Operation	For each control device subject to the monitoring provisions of this 40 CFR 63.453, the permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required.	5.B.14(d)	40 CFR 63.453(o)
AA-025, AA-026, AA-027, & AA-028	Site-Specific Inspection Plan	The permittee shall maintain records of all information required by the site-specific inspection plan developed in accordance with Section 3.D.6 of this document.	5.B.14(e)	40 CFR 63.454(b)
AA-025 & AA-026	Firebox Temperature	Install, calibrate, certify, operate, and maintain a CMS to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox when the incinerator (AA-016) is used to comply with the requirements of 40 CFR 63.443(d)(2).	5.B.14(f)	40 CFR 63.453(b)
AA-027 & AA-028	HAP	Performance testing shall be performed annually where specified by 40 CFR 63, Subpart S and biennially for all other testing requirements not specified.	5.B.14(g)	40 CFR 63.457(a) APC-S-6, Section III.A.3
AA-027	Scrubber Parameters	Install, calibrate, certify, operate, and maintain a CMS to measure the gas scrubber parameters.	5.B.15	40 CFR 63.453(c)
AA-028	Steam Stripper Parameters	Install, calibrate, certify, operate, and maintain a CMS to measure the parameters for each steam stripper.	5.B.16(a)	40 CFR 63.453(g)
AA-028	Operating Parameters	Install, calibrate, certify, operate, and maintain a CMS to measure the appropriate parameters determined in accordance with 40 CFR 63.446(n) used to comply with the condensate applicability requirements specified in 40 CFR 63.446(c).	5.B.16(b)	40 CFR 63.453(i)
AA-028	Pulping Process Condensate Collection System	Monitor, inspect, and record the requirements of 40 CFR 63.453(l)(1) for each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d).	5.B.16(c)	40 CFR 63.453(l)(1)
AA-028	Condensate Tank	Each condensate tank used in the closed collection system shall be operated with no detectable leaks as measured initially and annually, thereafter, by the procedures specified in 40 CFR 63.457(d).	5.B.16(d)	40 CFR 63.453(l)(2)
AA-028	Pulping Process Condensate Collection System	If an inspection identifies visible defects in the closed collection system, or if an instrument reading of 500 ppm or greater above background is measured, corrective actions shall be taken.	5.B.16(e)	40 CFR 63.453(l)(3)
AA-036	Opacity	Perform monthly visible emissions evaluation in accordance with EPA Ref. Method 9 and conduct control equipment inspections and maintenance.	5.B.17	APC-S-6, Section III.A.3

Emission Point(s)	Pollutant/ Parameter Monitored	Monitoring/Recordkeeping Requirement	Condition Number	Applicable Requirement
Entire Facility	Control Equipment	Maintain on hand at all times sufficient equipment as is necessary to repair and/or overhaul pollution control equipment. In the event of failure, cease operations until such time as repairs are made.	5.B.18	APC-S-6, Section III.A.3
Entire Facility	Operation and Control Equipment Parameters	Monitor and record appropriate operation and control equipment parameters during performance testing.	5.B.19	APC-S-6, Section III.A.3
Entire Facility	Performance Testing	Conduct performance testing at or near the maximum capacity of the unit.	5.B.20	APC-S-6, Section III.A.3
AA-010, AA-013, AA-015, & AA-016	CAM	Compliance assurance monitoring (CAM) is conducted by monitoring opacity using a COMS and voltage using a voltage controller (see tables at the end of this section).	5.B.21	40 CFR 64

5.B.1 The permittee shall maintain records of all inspections, maintenance, and cleanings conducted in accordance with Work Practice Requirements 3.D. Records should be maintained on-site in accordance with Permit Condition 5.A.3, and made available upon request from MDEQ personnel. (Ref.: APC-S-6, Section III.A.3)

5.B.2 For Emission Point AA-001, the permittee shall maintain records of all inspections, maintenance, and cleanings conducted in accordance with Work Practice Requirement 3.D.2. Records should be maintained on-site in accordance with Condition 5.A.3, and made available upon request from MDEQ personnel. (Ref.: APC-S-6, Section III.A.3)

5.B.3 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-005

(a) For Emission Point AA-005, the permittee shall maintain records of the hours of operation on a daily basis. (Ref.: PTC issued November 23, 1993)

(b) For Emission Point AA-005, the permittee shall calculate and record daily the hours of simultaneous operation with Emission Points AA-011 and AA-015 based on a 365-day rolling total. (Ref.: PTC issued November 23, 1993)

(c) For Emission Point AA-005, the permittee shall maintain monthly records of the annual fuel consumption rate (natural gas and propane) and calculate a twelve-month rolling total for each fuel used. (Ref.: APC-S-6, Section III.A.3)

(d) Performance testing for Emission Point AA-005 shall be required once per permit period and conducted within eighteen (18) months of the permit issuance date. For Emission Point AA-005, the permittee shall demonstrate compliance with the PM/PM_{10}, SO_2, NOx, CO, and VOC (as carbon) emission limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5, 6/8, 7, 10, and 18/25), or an otherwise approved equivalent method.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

5.B.4 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-006, AA-007, and AA-010

(a) For Emission Points AA-006, AA-007, and AA-010, maintain records of any occurrence of excess emissions from the digester system, brown stock washer system, multiple effect evaporator system, or condensate stripper system. Excess emissions shall be defined as follows:

(1) All twelve-hour average TRS concentrations above 5 ppm by volume unless the provisions of 40 CFR 60.283(a)(1)(i), (ii), or (iv) apply; or

(2) All periods in excess of 5 minutes and their duration which the combustion temperature at the point of incineration is less than 1200˚ F, where the provisions of 40 CFR 60.283(a)(1)(iii) apply. (Ref.: 40 CFR 60.284(d)(3)

(b) For Emission Points AA-006, AA-007, and AA-010, the permittee shall maintain daily records of the amount of time the Lime Kiln (AA-013) and the incinerator (AA-016) are used to combust TRS gases. The records shall be maintained in accordance with Condition 5.A.3. (Ref.: APC-S-6, Section III.A.3)

5.B.5 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-011

(a) For Emission Points AA-011, the permittee shall maintain records of the hours of operation on a daily basis. (Ref.: PTC issued November 23, 1993)

(b) For Emission Point AA-011, the permittee shall maintain daily records of the type of fossil fuel (natural gas, propane, or fuel oil) fired. (Ref.: PSD PTC issued July 14, 1992)

(c) For Emission Point AA-011, the permittee shall maintain records of the actual heat input of fossil fuel (natural gas, propane, or fuel oil) to the Recovery Boiler on a daily basis. (Ref.: PSD Permit to Construct issued July 14, 1992)

(d) For Emission Point AA-011, the permittee shall maintain and record the annual capacity factor of each fossil fuel (natural gas, propane, or fuel oil) used for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. (Ref.: PSD PTC issued July 14, 1992)

(e) For Emission Point AA-011, the permittee shall record and maintain daily records of the black liquor solids (BLS) firing rate (in tons/day) and calculate a 12-month rolling total. (Ref.: APC-S-6, Section III.A.3 and 40 CFR 63.866(c)(1))

(f) For Emission Point AA-011, maintain records of any occurrence of excess TRS emissions from the recovery furnace. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 5 ppm by volume. (Ref.: 40 CFR 60.284(d)(1)(i)

(g) For Emission Point AA-011, the permittee shall use a continuous opacity monitoring system (COMS) to monitor and record the opacity of the gases discharged into the atmosphere. When burning BLS, the monitoring system shall be operated as required in 40 CFR 60.284 and the span of this system shall be set at 70 percent. The procedures under 40 CFR 60.13 shall be followed for evaluation and operation of the monitoring system. (Ref.: 40 CFR 60.284(a)(1))

(h) For Emission Point AA-011, the permittee shall maintain records of excess opacity emissions from the recovery furnace. Excess emissions shall be defined as all 6-minute average opacities that exceed 35%. (Ref.: 40 CFR 60.284(d)(1)(ii))

(i) For Emission Point AA-011, the permittee must install, maintain, operate, and calibrate a COMS for the recovery furnace to record the opacity of the gases discharged into the atmosphere at least once every successive 10-second period. The permittee must also calculate and record each successive 6-minute average opacity, using the procedures set forth in 40 CFR 63.6(h) and 40 CFR 63.8. (Ref.: 40 CFR 63.864(d)(1))

(j) For Emission Point AA-011, the permittee shall maintain records of each time the oxygen (O_2) warning alarm is triggered for the computerized combustion control system and record the steps taken to return the boiler to optimum combustion conditions. The O_2 monitor(s) shall be maintained and calibrated in accordance with the manufacturer specifications.

(k) For Emission Point AA-011, 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 and include, but is not limited to, the following information:

(1) Operational Checklist (i.e., fields energized, minimum voltage level);

(2) Operational Procedures; and

(3) 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 Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel.

(l) For Emission Point AA-011, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Point AA-011, the permittee shall demonstrate compliance with the PM/PM_{10}, SO_2, TRS, NOx, CO, and Opacity limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5, 8, 16/16A, 7, 10, and 9), or an otherwise approved equivalent method.

For Emission Point AA-011, record the black liquor solids firing rate during each performance test.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

5.B.6 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-012

(a) For Emission Point AA-012, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Point AA-012, the permittee shall demonstrate compliance with the PM, SO_2, and TRS limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5, 6/8, and 16/16A/16B), or an otherwise approved equivalent method.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Points AA-012, the permittee shall monitor and record the pressure loss of the gas stream through the control equipment (scrubber) utilizing a continuous monitoring system (CMS). The CMS device must be certified, by the manufacturer, to an accuracy of ¶2 inches water gage pressure (¶500 Pascals). The measurements obtained from the CMS should be recorded once per shift. (Ref.: 40 CFR 60.284(b)(2)(i) and 40 CFR 60.284(c)(4))

(c) For Emission Point AA-012, the permittee shall install, maintain, operate, and calibrate a CMS to determine and record the pressure drop across the scrubber at least once every successive 15-minute period using the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(a)(2)(i). The monitoring device must be certified, by the manufacturer, to an accuracy of ¶2 inches water gage pressure

(¶500 Pascal's). (Ref.: 40 CFR 63.864(a)(2))

(d) For Emission Point AA-012, the permittee shall monitor and record once per operating shift the scrubbing liquid supply flow rate. (Ref.: APC-S-6, Section III.A.3)

5.B.7 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-013

(a) For Emission Point AA-013, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Point AA-013, the permittee shall demonstrate compliance with the PM, SO_2, TRS, NO_X, CO, and Opacity limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5, 6, 16, 7, 10, and 9), or an otherwise approved equivalent method.

For Emission Point AA-013, performance testing must be performed while controlling noncondensable gas (NCG) emissions.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-013, the permittee shall maintain records of any occurrence of excess TRS emissions from the lime kiln. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 8 ppm by volume. (Ref.: 40 CFR 60.284(d)(2))

(c) For Emission Point AA-013, the permittee shall record daily the CaO production rate in tons per day (or megagrams per day) and calculate based on a 365-day rolling total. (Ref.: 40 CFR 63.866(c)(2))

(d) For Emission Point AA-013, the permittee shall maintain daily records of the type(s) and amount(s) of fuel combusted. Also, the permittee shall maintain records monthly of the amount of on-site generated used oil burned as fuel and calculated on a 12-month rolling total. (Ref.: APC-S-6, Section III.A.3)

An annual chemical analysis of the on-site generated used oil, in accordance with Mississippi Hazardous Waste Management Regulations (Part 279.11), shall be conducted to determine if the material may be a hazardous waste. This analysis is only required if used oil has been burned at any time during the year. The sample that is analyzed should be representative of what is normally combusted. The on-site generated used oil combusted in the kiln must not contain hazardous waste. Records shall be maintained on-site of all analyses in accordance with Condition

5.A.3, and shall be made available upon request by MDEQ personnel. (Ref.: APC-S-6, Section III.A.3)

(e) For Emission Point AA-013, the permittee shall monitor and record the scrubbing liquid flow rate once per operating shift. Monitoring of the scrubbing liquid flow rate is an EPA-approved alternative to monitoring pressure loss across the scrubber as set forth in 40 CFR 60.284(b) and 40 CFR 63.864. Monitoring of the scrubbing liquid flow rate shall be conducted as set forth in other areas of this section. (Ref.: 40 CFR 60.284(b)(2)(i) 40 CFR 60.284(c)(4) and 40 CFR 63.864)

5.B.8 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-011, AA-012, and AA-013

(a) For Emission Points AA-011, AA-012, and AA-13, test methods and procedures are to be in accordance with 40 CFR 63.7, 63.865, and Conditions 5.B.5, 5.B.6, and 5.B.7 of this document. If the permittee opts for compliance with an overall PM emission limit established in accordance with 40 CFR 63.862(a)(1)(ii), the permittee must demonstrate compliance with the HAP metals standard by demonstrating compliance with the approved PM emissions limits for each affected Kraft or soda recovery furnace, smelt dissolving tank, and lime kiln, using the test methods and procedures in 40 CFR 63.865(b). Prior approval must be obtained from MDEQ.

(b) For Emission Points AA-011, AA-012, and AA-13, during the initial and subsequent performance tests, the permittee must establish operating ranges for the monitoring parameters specified in 40 CFR 63.864 as appropriate; or

(1) The permittee may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required by 40 CFR 63, Subpart MM. The permittee must certify that all control techniques and processes have not been modified subsequent to the testing for which the data used to establish the operating parameter ranges were obtained.

(2) The permittee may establish expanded or replacement operating ranges for the monitoring parameter values specified in 40 CFR 63.864 during subsequent performance tests using the test methods set forth in 40 CFR 63.865. (Ref.: 40 CFR 63.864)

(c) For Emission Points AA-011, AA-012, and AA-013, the permittee must maintain records of any occurrence when corrective action is required and a violation is noted under 40 CFR 63.864. The following conditions shall be considered violations:

(1) For an existing Kraft recovery furnace equipped with an ESP, when opacity is greater than 35% for 6% or more of the operating time within

any quarterly period;

(2) For an existing lime kiln equipped with an ESP, when opacity is greater than 20% for 6% or more of the operating time within any quarterly period;

(3) For an existing Kraft smelt dissolving tank or Kraft lime kiln equipped with a wet scrubber, when six (6) or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established in accordance with 40 CFR 63.864(k). (Ref.: 40 CFR 63.866(b))

(d) For Emission Points AA-011, AA-012, and AA-013, the permittee must maintain the general records required by 40 CFR 63.10(b)(2) plus the following parametric monitoring data:

(1) Records of the parameter monitoring data required under 40 CFR 63.864, including the following information:

(i) Any period when the operating parameter levels were inconsistent with the levels established during the initial and/or subsequent performance tests;

(ii) A brief explanation of the cause of the deviation;

(iii) The time the deviation occurred;

(iv) The time corrective action was initiated and completed; and

(v) The corrective action taken;

(2) All records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865 (a) through (e); and

(3) Records of any monitoring parameter ranges established for each affected source or process unit. (Ref.: 40 CFR 63.866(c)(3) through (c)(5))

(e) For Emission Points AA-011 and AA-013, the permittee shall use a CMS to monitor and record the concentration of TRS (on a dry basis). The TRS concentration span of the monitoring system shall be set at 30 ppm. (Ref.: 40 CFR 60.284(a)(2))

(f) For Emission PointsAA-011 and AA-013, the permittee shall calculate and record on a daily basis, 12-hour average TRS concentrations for the two (2) consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate 12 contiguous 1-hour average TRS concentrations provided by the continuous monitoring system(s). For the Recovery Boiler, the 12-hour TRS concentration shall be corrected to 8% oxygen.

For the lime kiln, the 12-hour TRS concentration shall be corrected to 10% oxygen. (Ref.: 40 CFR 60.284(c))

(g) For Emission Points AA-011 and AA-013, the permittee shall use a continuous monitoring system to monitor and record the percent of oxygen on a dry basis from the gases discharged into the atmosphere from the recovery boiler and the lime kiln. The span of the monitoring system shall be set at 20% oxygen. (Ref.: 40 CFR 60.284(a)(2))

(h) For Emission Points AA-011 and AA-013, the permittee shall calculate and record on a daily basis, 12-hour average oxygen concentrations from the recovery furnace and lime kiln, for the two consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate twelve contiguous 1-hour average oxygen concentrations provided by the CMS. The 12-hour oxygen average must correspond to the TRS concentration average. (Ref.: 40 CFR 60.284(a)(2) & (c))

(i) For Emission Points AA-012 and AA-013, the permittee shall monitor and record the scrubbing liquid supply pressure to the control equipment utilizing a CMS. The monitoring device must be certified by the manufacturer to an accuracy of ¶15% of the design scrubbing liquid supply pressure. The pressure sensor tap is to be located close to the scrubber liquid discharge point. If necessary, the permittee may submit a written request for approval of an alternative sensor location. The measurements obtained from the CMS should be recorded once per shift. (Ref.: 40 CFR 60.284(b)(2)(ii) and 40 CFR 60.284(c)(4))

(j) For Emission Points AA-012 and AA-013, the permittee shall install, maintain, operate, and calibrate a CMS to monitor and record the scrubber liquid flow rate at least once every successive 15-minute period in accordance with the procedures set forth in 40 CFR 63.8(c) and 40 CFR 63.864(e). The monitoring device must be, certified by the manufacturer, to an accuracy of ¶5 percent of the design scrubbing liquid flow rate. (Ref.: 40 CFR 63.864(e))

5.B.9 MONITORING AND RECORDKEEPING REQUIREMENTS FOR VISIBLE EMISSIONS FROM EMISSION POINTS AA-012, AA-013, AA-014, AA-016, AA-021, AND AA-023

For Emission Points AA-012, AA-013, AA-014 (Lime Shaker Vents RC-1/2), AA-016, AA-021, and AA-023, the permittee must conduct *weekly* inspections for visible emissions. If visible emissions are detected (one-minute interval), with the exception of steam plumes, conduct a minimum of one 6-minute observation in accordance with EPA Reference Method 9. Upon observation of visible emissions from an emission point, the frequency of observation for that emission point shall become *daily* until no emissions are observed for seven (7) consecutive days. After 7 consecutive days of no visible emission observations, the inspection frequency may be reduced to *weekly*. If no visible emissions are observed after three (3) consecutive months of weekly observations, the frequency may be reduced to *monthly*. However, if emissions are observed during a

monthly inspection, the frequency of inspection shall revert to the *daily* schedule as specified above. The permittee shall maintain records of all applicable opacity inspections (visible emissions evaluations (VEE)) in accordance with Condition 5.A.3. (Ref.: APC-S-6, Section III.A.3)

5.B.10 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-015

(a) For Emission Point AA-015, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Point AA-015, the permittee shall demonstrate compliance with the PM, SO_2, NO_X, CO, and Opacity limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 1-5, 6, 16, 7, 10, and 9), or an otherwise approved equivalent method.

For Emission Point AA-015, determine the maximum fuel-firing rate and record the oxygen concentration in the stack during testing.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-015, the permittee shall install, calibrate, maintain and operate a CMS to measure and record the opacity of gases discharged into the atmosphere from the power boiler. The span value for the CMS measuring the opacity of emissions shall be 80, 90, or 100 percent. (Ref.: 40 CFR 60.45(c)(3))

(c) For Emission Point AA-015, the permittee shall maintain records of any occurrence of excess opacity emissions. Excess emissions shall be defined as any 6-minute period during which the average opacity of emissions exceeds 20%, except that one 6-minute average per hour of up to 27% opacity need not be reported. (Ref.: 40 CFR 60.45(g) and (l))

(d) For Emission Point AA-015, the permittee shall maintain an O&M Plan for the ESP (control device). The O&M Plan should be maintained on-site in accordance with Condition 5.A.3. The plan should include, but is not limited to, the following information:

(1) Operational Checklist (i.e., fields energized, minimum voltage level);

(2) Operational Procedures;

(3) 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 Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel.

(e) For Emission Point AA-015, the permittee shall maintain daily records of the type(s) and amount(s) of fuel combusted. (Ref.: APC-S-6, Section III.A.3)

(f) For Emission Point AA-015, the permittee shall maintain records daily of the hours of operation. (Ref.: PTC issued November 23, 1993)

(g) For Emission Point AA-015, the permittee shall maintain records daily of the hours of NCG incineration and calculate a 12-month rolling total. (Ref.: APC-S-6, Section III.A.3)

(h) For Emission Point AA-015, the permittee shall monitor and record the percent of O_2 (on a dry basis) from the gases discharged from the power boiler prior to the ESP. The O_2 monitor shall be maintained and calibrated in accordance with the manufacturer specifications. Records should be maintained on-site in accordance with Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel. (Ref.: APC-S-6, Section III.A.3)

(i) For Emission Point AA-015, the permittee shall calculate and record the 12-hour average O_2 concentrations from the power boiler for the two (2) consecutive periods of each operating day. Each 12-hour average shall be determined as the arithmetic mean of the appropriate twelve contiguous 1-hour average O_2 concentrations. Use this data to ensure proper boiler operation. Maintain records of O_2 monitoring, the daily 12-hour average O_2 concentrations, all O_2 monitor maintenance and calibration, and any instances of corrective action taken to ensure proper boiler operation. Records should be maintained on-site in accordance with Condition 5.A.3, and all records shall be made available upon request by MDEQ personnel. (Ref.: APC-S-6, Section III.A.3)

5.B.11 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-016

(a) For Emission Point AA-016, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Point AA-016, the permittee shall demonstrate compliance with the SO_2, TRS, NOx, CO, and Opacity limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 6, 16, 7, 10, and 9), or an otherwise approved equivalent method.

For Emission Point AA-016, performance testing must be performed while controlling noncondensable gas emissions.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the

submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-016, the permittee shall install, calibrate, maintain and operate a CMS to monitor and record the combustion temperature at the point of incineration of effluent gases, which are emitted from any digester system, brown stock washer system, multiple-effect evaporator system, black liquor oxidation system, or condensate stripper system, where the provisions of 40 CFR 60.283(a)(1)(iii) apply. The monitoring device is to be certified to be accurate within ¶1% of the temperature being measured. (Ref.: 40 CFR 60.284(b)(1)

(c) For Emission Point AA-016, the permittee shall maintain records of any period in excess of 5 minutes during which the combustion temperature at the point of incineration is less than 1200º F. Records should include date, time, and duration of the event. (Ref.: 40 CFR 60.284(d)(3)(ii))

(d) For Emission Point AA-016, the permittee shall maintain daily records of the type(s) and amount(s) of fuel combusted. (Ref.: APC-S-6, Section III.A.3)

(e) For Emission Point AA-016, the permittee shall maintain records daily of the hours of operation. (Ref.: APC-S-6, Section III.A.3)

(f) For Emission Point AA-016, the permittee shall maintain records daily of the hours of NCG incineration and calculate a 12-month rolling total. (Ref.: APC-S-6, Section III.A.3)

(g) For Emission Point AA-016, the permittee shall maintain records of excess TRS emissions from the incinerator. Excess emissions shall be defined as all 12-hour averages of TRS concentrations above 5 ppm by volume. Note: A semi-annual excess emissions report will also be required if the incinerator is permanently removed from 'back-up incinerator status'. (Ref.: 40 CFR 60.284(d)(3) & (e))

5.B.12 For Emission Points AA-021 and AA-023, the permittee shall be required to stack test biennially (every 2 years) with the initial testing to occur within eighteen (18) months of the permit issuance date. For Emission Points AA-021 and AA-023, the permittee shall demonstrate compliance with the VOC (as carbon) and Opacity (and CO for AA-021) limitations in accordance with the appropriate EPA Reference Methods (e.g., EPA Ref. Methods 10, 25/25A, and 9), or an otherwise approved equivalent method.

A test protocol shall be submitted at least thirty (30) days prior to the proposed test date to ensure that all test methods and procedures are acceptable to the MDEQ. A pre-test conference (if necessary) may be scheduled prior to the submittal of the test protocol. Also, the MDEQ must be notified at least ten (10) days prior to the scheduled test date so that an observer may be scheduled to witness the test(s). (Ref.: APC-S-6, Section III.A.3)

5.B.13 For Emission Point AA-024, the permittee shall maintain daily records of the hours of operation. (Ref.: APC-S-6, Section III.A.3)

5.B.14 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINTS AA-025, AA-026, AA-027, and AA-028

(a) For Emission Points AA-025 and AA-027, the permittee shall meet the following requirements for each enclosure and closed-vent system used to comply with 40 CFR 63.450(a):

(1) For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

(2) Each closed-vent system required by 40 CFR 63.450(a) shall be visually inspected every 30 days and as necessary to ensure proper function. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

(3) For positive pressure closed-vent systems or portions of closed-vent systems, the permittee must demonstrate that there were no detectable leaks as specified in 40 CFR 63.450(c) to be measured initially and annually, thereafter, in accordance with the procedures specified in 40 CFR 63.457(d).

(4) The permittee must demonstrate initially and annually, thereafter, that each applicable enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).

(5) The valve or closure mechanism specified in § 63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

The term "every 30 days" shall mean at least once per month for the purposes of compliance monitoring and recordkeeping.

(6) If an inspection identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450; or, if an instrument reading of 500 ppm by volume or greater above background is measured; or, if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

(i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.

(ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the

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))

(b) For Emission Points AA-025, AA-026, AA-027, and AA-028, if the permittee elects to use a control device, technique, or an alternative parameter other than those specified in this Section, the permittee must obtain prior approval from MDEQ. In addition, the permittee shall install a CMS, and establish appropriate operating parameters to be monitored that sufficiently demonstrate continuous compliance with the applicable control requirements. (Ref: 40 CFR 63.453(m))

(c) For Emission Points AA-025, AA-026, AA-027, and AA-028, the permittee may establish or reestablish the value for each operating parameter required to be monitored and more specifically detailed in 40 CFR 63.453(n) by following the procedures listed below:

(1) During the initial performance test required in 40 CFR 63.457(a) or any subsequent performance test, continuously record the operating parameter;

(2) 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;

(3) The permittee shall submit for approval by MDEQ, the rationale for selecting the monitoring parameters; and

(4) The permittee shall submit for approval by MDEQ, 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. (Ref.: 40 CFR 63.453(n)(1) - (n)(4))

(d) For Emission Points AA-025, AA-026, AA-027, and AA-028, and each control device subject to the monitoring provisions of 40 CFR 63.453, the permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure. Note, except as provided in 40 CFR 63.443(e), or 63.446(g), operation of the control device below the established minimum operating parameter values or above the established maximum operating parameter values; or failure to perform required procedures set forth in 40 CFR 63 Subpart S shall constitute a violation of the applicable emission standard and must be reported as a period of excess emissions. (Ref.: 40 CFR 63.453(o))

(e) For Emission Points AA-025, AA-026, AA-027, and AA-028, the permittee shall maintain records of all information required by the site-specific inspection plan

developed in accordance with Section 3.D.6 of this document. These records should be made available upon request by MDEQ personnel. (Ref.: 40 CFR 63.454(b))

(f) For Emission Points AA-025 and AA-026, the permittee shall install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a CMS, as defined in 40 CFR 63.2, to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs when the incinerator (Emission Point AA-016) is used to comply with the requirements of 40 CFR 63.443(d)(2). (Ref: 40 CFR 63.453(b))

(g) For Emission Points AA-027 and AA-028, initial performance testing was required for all emission sources subject to the limitations set forth in 40 CFR 63.445 and 63.446 by April 16, 2001. Thereafter, testing shall be performed annually where specified by 40 CFR 63, Subpart S, and biennially for all other testing requirements not specified. Performance testing must also be repeated upon any indication that the previously established parameters are no longer valid (i.e., significant construction/operational modifications). (Ref.: 40 CFR 63.457 and APC-S-6, Section III.A.3)

5.B.15 For Emission Point AA-027, the permittee shall install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a CMS, as defined in 40 CFR 63.2, to measure the following parameters for each bleach plant gas scrubber used to comply with the bleaching system requirements of 40 CFR 63.445(c):

(a) The pH or the oxidation/reduction potential of the gas scrubber effluent;

(b) The gas scrubber fan amps (EPA Alternative Approved June 7, 2001); and

(c) The gas scrubber liquid influent flow rate.

(Ref: 40 CFR 63.453(c)

5.B.16 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-028

(a) For Emission Point AA-028, the permittee shall install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a CMS as defined in 40 CFR 63.2 to measure the following parameters for each steam stripper used to comply with the treatment requirements in 40 CFR 63.446(e)(3):

(1) The process wastewater feed rate;

(2) The steam feed rate; and

(3) The process wastewater column feed temperature.

(Ref.: 40 CFR 63.453(g))

(b) For Emission Point AA-028, to comply with the condensate applicability requirements specified in 63.446(c), the permittee shall install, calibrate, certify, operate, and maintain, in accordance with the manufacturer's specifications, a CMS as defined in 40 CFR 63.2 to measure the appropriate parameters determined in accordance with 40 CFR 63.446(n). (Ref.: 40 CFR 63.453(i))

(c) For Emission Point AA-028, the permittee shall meet the following requirements for each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d):

(1) Each pulping process condensate closed collection system shall be visually inspected every 30 days and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964 of 40 CFR 63, Subpart RR, except:

(2) The permittee shall comply with the recordkeeping requirements of 40 CFR 63.454 instead of the requirements specified in 40 CFR 63.964(a)(1)(vi) and (b)(3) of Subpart RR.

(3) The permittee shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in 40 CFR 63.453(a) and (k), instead of the requirements specified in 40 CFR 63.964(a)(2) of Subpart RR. (Ref.: 40 CFR 63.453(l)(1))

The term "every 30 days" shall mean at least once per month for the purposes of compliance monitoring and recordkeeping.

(d) For Emission Point AA-028, 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, thereafter, by the procedures specified in 40 CFR 63.457(d). (Ref.: 40 CFR 63.453(1)(2))

(e) For Emission Point AA-028, if an inspection required by 40 CFR 63.453(l) identifies visible defects in the closed collection system, or if an instrument reading of 500 ppm or greater above background is measured; then corrective actions specified in 40 CFR 63.964(b) of Subpart RR shall be taken. (Ref.: 40 CFR 453(l)(3))

The permittee shall monitor the following parameters (as necessary to demonstrate compliance): condensate flow rates continuously, condensate feed temperatures, steam rates, steam-to-feed ratios, daily pulp production rate, and calculated methanol collected and removed (lb/ODP) over a 15-day rolling average.

5.B.17 MONITORING AND RECORDKEEPING REQUIREMENTS FOR EMISSION POINT AA-036

(a) For Emission Point AA-036, the permittee shall perform monthly opacity observations during unloading operations and maintain a log of the results. (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-036, the permittee shall perform inspections and maintenance each month, or more often as needed, to ensure proper operation of the baghouse is maintained. Records of any inspections and/or maintenance shall be kept in log form and must be made available for review upon request by MDEQ personnel.

5.B.18 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 any 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)

5.B.19 The permittee shall document, as required to determine operation and control equipment parameters, all appropriate parametric monitoring data and operating conditions during performance testing and provide the information with the test report. Such documentation may include, but is not limited to, fuel quality analyses, fuel flow/firing rates, steam production rates, scrubbing liquid flow rate and/or pressure, ESP field electrical data, firebox temperature, opacity, production rate of air-dried pulp, and production rate of CaO from the lime kiln. (Ref.: APC-S-6, Section III.A.3)

5.B.20 The permittee shall conduct all required performance testing at or near the maximum capacity of the unit.

5.B.21 For Emission Points AA-010, AA-013, AA-015, and AA-016, the permittee shall comply with the compliance assurance monitoring (CAM) requirements as specified in Parts 64.7 through 64.9 and detailed in the following CAM Plans:

COMPLIANCE ASSURANCE MONITORING (CAM) PLANS

Emission Point AA-010 – Tall Oil Reactor (EV-1)

	Indicator No. 1	Indicator No. 2
I. Indicator	Scrubbing Liquid pH	Scrubber Liquid Flow Rate Pump (ON/OFF)
Measurement Approach	Scrubber liquid pH is monitored by pH meter.	Pump (ON/OFF).
Monitoring Frequency	Monitor and record pH once per shift.	Monitor pump (ON/OFF) continuously and record once per shift.
Justification	pH readings indicate that enough caustic is being added to minimize H_2S emissions.	Liquid flow ensures sufficient gas/liquid contact.
II. Indicator Range	Scrubbing liquid pH operating range to be established during *each* testing event and reported to MDEQ.	N/A
III. Performance Criteria		
Data Representativeness	Manual pH from scrubber liquid effluent line.	Pump ON/OFF sensor located at the pump motor.
QA/QC	Calibrate, operate, and maintain instrument according to the manufacturer's specifications.	Calibrate, operate, and maintain instrument according to the manufacturer's specifications.
Data Collection Procedures	Scrubbing liquid pH is recorded at least once per shift on a log sheet.	An indication of scrubber liquid flow is recorded at least once per shift on a log sheet.
Averaging Period	pH is recorded once per shift on a log sheet.	Operation is recorded once per shift on a log sheet
APCD Bypass Monitoring	No bypass. Interlock prevents reactor from operating without the scrubber running.	

Emission Point AA-013 – Lime Kiln (RC-6)

	Indicator No. 1	Indicator No. 2
I. Indicator	Scrubbing Liquid pH	Scrubber Liquid Flow Rate
Measurement Approach	Scrubber liquid pH is monitored by pH meter.	Liquid flow meter
Monitoring Frequency	Monitor and record pH once per shift.	Monitor and record continuously.
Justification	pH readings indicate that enough caustic is being added to minimize SO_2 emissions.	Liquid flow ensures sufficient gas/liquid contact.
II. Indicator Range	Scrubbing liquid pH operating range to be established during *each* testing event and reported to MDEQ.	Scrubbing liquid flow rate operating range to be established during *each* testing event and reported to MDEQ.
III. Performance Criteria		
Data Representativeness	pH meter in the scrubber liquid effluent line.	Liquid flow meter in the scrubbing liquid recirc line.
QA/QC	Calibrate, operate, and maintain instrument according to the manufacturer's specifications.	Calibrate, operate, and maintain instrument according to the manufacturer's specifications. Flow accuracy must be within ±5% of design flow rate.
Data Collection Procedures	Scrubbing liquid pH is recorded at least once per shift on a log sheet.	Scrubbing liquid flow rate is recorded once every 15 minute period and 3-hour average on a strip chart or data acquisition system.
Averaging Period	pH is recorded once per shift on a log sheet.	3-hour average
APCD Bypass Monitoring	No bypass of the scrubber is possible.	

Emission Point AA-015 – Power Boiler (UT-3)

	Indicator No. 1	Indicator No. 2
I. Indicator	Opacity	Voltage
Measurement Approach	Opacity is monitored by a Continuous Opacity Monitor (COM).	Voltage is measured by a TR Voltage Controller.
Monitoring Frequency	Continuous	Continuous
Justification	Opacity is good indicator of ESP performance. Low opacity indicates low particulate breakthrough.	Voltage is a good indicator of ESP performance. Increases in voltage typically result in increased controls.
II. Indicator Range	An excursion is defined as the presence of emissions above 15% lasting for 10 consecutive 6-minute averages.	An excursion is defined as a decrease in voltage and/or any 4 of 6 fields in operation. A voltage limit will be established during *each* compliance test and reported to MDEQ.
III. Performance Criteria		
Data Representativeness	The COM is installed on the boiler stack.	A TR Voltage Controller is located at each rectifier.
QA/QC	The equipment is maintained and operated to suggested manufacturer's recommendations.	The equipment is maintained and operated to suggested manufacturer's recommendations.
Data Collection Procedures	Data is collected continuously by the COMS except during periods of calibration and maintenance.	Voltage is monitored continuously.
Averaging Period	The COMS records every 6-minute average and prints a daily report of all 6-minute averages.	Voltage is recorded once per shift on a log sheet.
APCD Bypass Monitoring	No bypass of the ESP is possible.	

Emission Point AA-016 – NCG Incinerator (RC-22)

	Indicator No. 1	Indicator No. 2
I. Indicator	Scrubbing Liquid pH	Scrubber Liquid Flow Rate
Measurement Approach	Scrubber liquid pH is monitored by pH meter.	Liquid flow meter
Monitoring Frequency	Monitor and record pH once per shift.	Monitor continuously and record once per shift.
Justification	pH readings indicate that enough caustic is being added to minimize SO_2 emissions.	Liquid flow ensures sufficient gas/liquid contact.
II. Indicator Range	Scrubbing liquid pH operating range to be established during *each* testing event and reported to MDEQ.	Scrubbing liquid flow rate operating range to be established during *each* testing event and reported to MDEQ.
III. Performance Criteria		
Data Representativeness	pH meter in the scrubber liquid effluent line.	Liquid flow meter in the scrubbing liquid recirc line.
QA/QC	Calibrate, operate, and maintain instrument according to the manufacturer's specifications.	Calibrate, operate, and maintain instrument according to the manufacturer's specifications.
Data Collection Procedures	Scrubbing liquid pH is recorded at least once per shift on a log sheet.	Scrubbing liquid flow rate is recorded at least once per shift on a log sheet.
Averaging Period	pH is recorded once per shift on a log sheet.	Flow rate is recorded once per shift on a log sheet.
APCD Bypass Monitoring	No bypass of the scrubber is possible.	

C. Specific Reporting Requirements

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-005	Operating Hours	Submit a semiannual report summarizing the hours of operation for the preceding six-month period.	5.C.1(a)	PTC issued November 23, 1993 APC-S-6, Section III.A.3
AA-005	Fuel Consumption	Submit a semiannual report of the annual fuel consumption rate for natural gas and propane based on a 12-month rolling total for the preceding 6-month period.	5.C.1(b)	APC-S-6, Section III.A.3
AA-005 (and AA-011 & AA-015)	Operating Hours	Quarterly report summarizing the total hours of simultaneous operation of Emission Points AA-005, AA-011, and AA-015.	5.C.1(c)	PTC issued November 23, 1993
AA-005	PM/PM_{10}, SO_2, NO_X, CO, and VOC	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-006, AA-007, & AA-010	TRS or Combustion Temperature	Semiannual report of any periods of excess emissions that occurred as indicated in 40 CFR 60.284(d)(3). Each excess emission report shall include the information required in 40 CFR 60.7(c).	5.C.3	40 CFR 60.284(d)
AA-006	Hours Vented to Controls	Semiannual report summarizing the amount of time the Lime Kiln (AA-013) and the incinerator (AA-016) are used to combust TRS gases from the digester system for the previous 6-month period.	5.C.4	APC-S-6, Section III.A.3
AA-011, AA-012, & AA-013	HAP Metals (PM)	Pretest notifications and stack test report requirements.	5.C.2	40 CFR 63. 864(b)(1) APC-S-6, Section III.A.3
AA-011, AA-012, & AA-013	HAP Metals (PM)	Submit report of the operating ranges for any monitoring parameters determined during the compliance performance testing and a biennial update to coincide with the biennial test report.	5.C.2 & 5.C.5(a)	40 CFR 63. 864(b)(1) APC-S-6, Section III.A.3
AA-011, AA-012, & AA-013	Corrective Actions	Semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in Sections 3.D and 5.B of this document	5.C.5(b)	40 CFR 63.866(b)
AA-011, AA-012, & AA-013	Parametric Monitoring	Semiannual report summarizing the information required by 40 CFR 63.10(b)(2) and the parametric monitoring data set forth in 40 CFR 63.866(c).	5.C.5(c)	40 CFR 63.866(c)
AA-011	PM/PM_{10}, SO_2, TRS, NO_x CO, and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-011	Operating Hours	Quarterly report summarizing the total hours of simultaneous operation of Emission Points AA-005, AA-011, and AA-015.	5.C.1(c)	PTC issued November 23, 1993
AA-011	Fuel Usage	Semiannual report summarizing the fossil fuel usage and heat input to the boiler.	5.C.6(a)	APC-S-6, Section III.A.3
AA-011	Fossil Fuel Capacity Factor	Semiannual report of the Fossil Fuel Annual Capacity Factor calculations and rolling total.	5.C.6(b)	APC-S-6, Section III.A.3
AA-011	BLS	Semiannual report summarizing the BLS firing rate.	5.C.6(c)	APC-S-6, Section III.A.3 40 CFR 63.866(c)(1)

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-011	TRS	Semiannual excess emissions report. Each excess emission report shall include the information required in 40 CFR 60.7(c).	5.C.6(d)	40 CFR 60.284(d) & (e)
AA-011	Opacity	Quarterly/semiannual reports. Each excess emission report shall include the information required in 40 CFR 60.7(c).	5.C.6(e)	40 CFR 60.284(d) & (e) 40 CFR 63.864(a)(1)
AA-011	O_2	Semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s).	5.C.6(f)	APC-S-6, Section III.A.3
AA-012	PM/PM_{10}, SO_2, and TRS	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-012	Scrubber Parameters	Semiannual monitoring system performance report including a summary of the average scrubbing liquid supply pressure, the pressure loss across the scrubber, and the scrubbing liquid flow rate.	5.C.7	40 CFR 60.284(b) 40 CFR 63.864(a)(2))
AA-013	PM/PM_{10}, SO_2, TRS, NO_x, CO, and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-013	TRS	Semiannual excess emissions report. Each excess emission report shall include the information required in 40 CFR 60.7(c).	5.C.8(a)	40 CFR 60.284(d) & (e)
AA-013	CaO Production	Semiannual report of the CaO Production Rate.	5.C.8(b)	APC-S-6, Section III.A.3 40 CFR 63.266
AA-013	Scrubber Parameters	Semiannual monitoring system performance report including a summary of the average scrubbing liquid supply pressure and the scrubbing liquid flow rate. Monitoring of the scrubbing liquid flow rate is an EPA approved alternative to monitoring pressure loss across the scrubber as set forth in 40 CFR 60.284(b)(2)(i).	5.C.8(c)	40 CFR 60.284(b) 40 CFR 63.864(a)(2))
AA-013	Fuel Usage	Semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period.	5.C.8(d)	APC-S-6, Section III.A.3
AA-013	Used Oil Combusted	Semiannual report of the amount of on-site generated used oil burned as fuel as determined monthly and on a 12-month rolling total.	5.C.8(e)	APC-S-6, Section III.A.3
AA-013	O_2	Semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s).	5.C.8(f)	APC-S-6, Section III.A.3
AA-015	PM, SO_2, NO_x, CO, and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-015	Opacity	Semiannual excess emission and monitoring system performance reports for Opacity. Each excess emission and monitoring system performance report shall include the information required in 40 CFR 60.7(c).	5.C.9(a)	40 CFR 60.45(g)

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-015	Hours of NCG Incineration	Semiannual report of the hours of NCG incineration.	5.C.9(b)	APC-S-6, Section III.A.3
AA-015	Operating Hours	Quarterly report summarizing the total hours of simultaneous operation of Emission Points AA-005, AA-011, and AA-015.	5.C.1(c)	PTC issued November 23, 1993
AA-015	O_2	Semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s).	5.C.9(c)	APC-S-6, Section III.A.3
AA-015	Fuel Usage	Semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period.	5.C.9(d)	APC-S-6, Section III.A.3
AA-016	SO_2, TRS, NO_X, CO, and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-016	Combustion Temperature	Submit semiannual report of the periods in excess of 5 minutes and their duration where the combustion temperature at the point of incineration is less than 1200ºF.	5.C.10(a)	APC-S-6, Section III.A.3
AA-016	Hours of NCG Incineration	Semiannual report of the hours of NCG incineration.	5.C.10(b)	APC-S-6, Section III.A.3
AA-016	TRS	Semiannual excess emissions report. Each excess emission report shall include the information required in 40 CFR 60.7(c).	5.C.10(c)	40 CFR 60.284(d) & (e)
AA-016	Fuel Usage	Semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period.	5.C.10(d)	APC-S-6, Section III.A.3
AA-021	CO, VOC, and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-023	VOC and Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-024	Operating Hours	Submit a semiannual report summarizing the hours of operation for the preceding 6-month period	5.C.11	APC-S-6, Section III.A.3
AA-025, AA-026, AA-027, & AA-028	Alternative Parameter Monitoring	If the permittee elects to use a control device, technique, or an alternative parameter other than those specified in Section 5.B, the permittee must obtain prior approval from MDEQ.	5.C.12(a)	40 CFR 63.453(m)
AA-025, AA-026, AA-027, & AA-028	Operating Parameters	To establish or reestablish an operating parameter value for which there is required monitoring, the permittee must submit a rationale in accordance with 40 CFR 63.453(n) and Section 5.B.	5.C.12(b)	40 CFR 63.453(n)
AA-025, AA-026, AA-027, & AA-028	Site-Specific Inspection Plan	Submit a semiannual report of compliance with the Site-Specific Inspection Plan including a summary of the information specified in 3.D.	5.C.12(c)	40 CFR 63.454 APC-S-6, Section III.A.3
AA-025, AA-026, AA-027, & AA-028	Corrective Actions	Semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in 5.B.	5.C.12(d)	APC-S-6, Section III.A.3

Emission Point(s)	Pollutant/ Parameter Monitored	Reporting Requirement	Condition Number	Applicable Requirement
AA-025, AA-026, AA-027, & AA-028	CMS and/or Control Device	Semiannual excess emissions report. Each excess emission report shall include the information required in 40 CFR 63, Subpart A, General Provisions.	5.C.12(e)	40 CFR 63.453 APC-S-6, Section III.A.3
AA-025 & AA-027	Enclosure & Closed-Vent System	Semiannual report of compliance with the inspection requirements set forth in 5.B.	5.C.12(f)	40 CFR 63.453(k) APC-S-6, Section III.A.3
AA-027 & AA-028	HAP	Pretest notifications and stack test report requirements.	5.C.2	40 CFR 63. 457(a) APC-S-6, Section III.A.3
AA-028	Condensate Collection System	Submit a semiannual report of compliance with the requirements set forth in 5.B.	5.C.13(a)	APC-S-6, Section III.A.3
AA-028	Condensate Tank	Submit a semiannual report of compliance with the requirements set forth in 5.B.	5.C.13(b)	APC-S-6, Section III.A.3
AA-036	Opacity	Pretest notifications and stack test report requirements.	5.C.2	APC-S-6, Section III.A.3
AA-010, AA-013, AA-015, & AA-016	CAM	Submit a semiannual report summarizing excess emissions or excursions of parameters set forth in CAM Plan(s).	5.C.14	40 CFR 64

5.C.1 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-005

(a) For Emission Point AA-005, the permittee must submit a semiannual report summarizing the hours of operation in accordance with Condition 5.A.4 for the most recent semiannual period. (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-005, the permittee shall submit a semiannual report of the annual fuel consumption rate for natural gas and propane based on a 12-month rolling total, in accordance with Condition 5.A.4 for the most recent semiannual period. (Ref.: APC-S-6, Section III.A.3)

(c) For Emission Points AA-005 (and AA-011 & AA-015), the permittee must submit a quarterly report summarizing the hours of simultaneous operation of the three emission points. These reports shall be submitted within thirty (30) days of the close of each calendar quarter. (Ref.: PTC issued on November 23, 1993)

5.C.2 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-005, AA-011, AA-012, AA-013, AA-015, AA-016, AA-021, and AA-023

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:

(a) A notification of the scheduled test date(s) should be submitted ten (10) days prior to the scheduled date(s) so 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.

(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. Note, for VOC emissions testing conducted in accordance with EPA Reference Methods 25 or 25A, the permittee shall report the results on an "as carbon" basis.

(e) The permittee shall submit a summary of the results of any periodic and/or parametric monitoring required to be monitored and recorded by Condition 5.B during performance testing.

(f) The performance test results must be submitted to MDEQ within sixty (60) days following completion of the performance test.

(g) Special Testing Requirements, include but are not limited to:

(1) For Emission Point AA-011, report the black liquor solids firing rate during each performance test.

(2) For Emission Point AA-015, report the maximum fuel-firing rate and record the oxygen concentration measured in the stack during testing. (Ref.: APC-S-6, Section III.A.3)

5.C.3 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-006, AA-007, AND AA-010

For Emission Points AA-006, AA-007, and AA-010, the permittee shall submit a semiannual report of any periods of excess emissions that occurred as indicated in 40 CFR 60.284(d)(3) in accordance with Condition 5.A.4 for the previous semiannual period. Each excess emission report shall include the information required in 40 CFR 60.7(c). Periods of excess emissions will not be considered indicative of a violation of 40 CFR 60.11(d) provided that the facility can demonstrate to MDEQ that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

5.C.4 REPORTING REQUIREMENTS FOR EMISSION POINT AA-006

For Emission Point AA-006, the permittee shall submit a semiannual report summarizing the amount of time the Lime Kiln (AA-013) and the amount of time the incinerator (AA-016) are used to combust TRS gases from the digester system in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: APC-S-6, Section III.A.3)

5.C.5 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-011, AA-012, AND AA-013

(a) For Emission Points AA-011, AA-012, and AA-013, the permittee must submit a report of the operating ranges for any monitoring parameters determined during the Initial Compliance testing for HAP Metals. In addition, a annual or biennial update (depending on required testing) of the applicable parameters must be submitted concurrently with the subsequent compliance test reports. (Ref.: 40 CFR 864(b)(1))

(b) For Emission Points AA-011, AA-012, and AA-013, the permittee shall submit a semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in Section 3.D in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: 40 CFR 63.866(b))

(c) For Emission Points AA-011, AA-012, and AA-013, the permittee shall submit a semiannual report summarizing the information required by 40 CFR 63.10(b)(2), and the parametric monitoring data as set forth in 40 CFR 63.866(c), in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: 40 CFR 63.866(c))

5.C.6 REPORTING REQUIREMENTS FOR EMISSION POINT AA-011

(a) For Emission Point AA-011, the permittee shall submit semiannual report summarizing the fossil fuel usage and heat input in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-011, the permittee shall submit reports of the monthly annual capacity factor calculations based on a 12-month rolling total in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: APC-S-6, Section III.A.3)

(c) For Emission Point AA-011, the permittee shall submit a report summarizing the black liquor solids firing rate as determined based on a 365-day rolling total in accordance with Condition 5.A.4 for the previous semiannual period. (Ref.: APC -S-6, Section III.A.3 and 40 CFR 63.866(c)(1))

(d) For Emission Point AA-011, the permittee shall submit a report indicating periods of excess emissions for all 12-hour averages of TRS above 5 ppm by volume total in accordance with Condition 5.A.4 for the previous semiannual period. It will not be indicative of a violation of 40 CFR 60.11(d) if the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction) during which excess emissions occur does not exceed 1%. In addition, the facility must demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

(e) For Emission Point AA-011, when operating the continuous monitoring system under 40 CFR 60, Subpart BB (i.e., burning BLS), the permittee shall report periods of excess emissions for all 6-minute average opacities that exceed 35% total, in accordance with Condition 5.A.4 for the previous semiannual period. Periods of excess emissions will not be considered indicative of a violation of 40 CFR 60.11(d) provided that the total number of possible contiguous periods of excess emissions in quarter (excluding periods of startup, shutdown, or malfunction) during which excess emissions occur does not exceed 6% for average opacities. In addition, the facility must demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

(f) For Emission Point AA-011, the permittee shall submit a semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s) taken for the previous 6-month period in accordance with Condition 5.A.4.

5.C.7 REPORTING REQUIREMENTS FOR EMISSION POINT AA-012

For Emission Point AA-012, the permittee shall submit a semiannual monitoring system performance report including a summary of the average scrubbing liquid supply pressure, the pressure loss across the scrubber, and the scrubbing liquid flow rate, in accordance with Condition 5.A.4. (40 CFR 60.284(b) and 40 CFR 63.864(a)(2))

5.C.8 REPORTING REQUIREMENTS FOR EMISSION POINT AA-013

(a) For Emission Point AA-013, the permittee shall submit a report indicating periods of excess emissions for all 12-hour averages of TRS above 8 ppm by volume total in accordance with Condition 5.A.4 for the previous semiannual period. It will not be indicative of a violation of 40 CFR 60.11(d) if the facility can demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

(b) For Emission Point AA-013, the permittee shall submit a report of the CaO production rate in tons per day and on a 365-day rolling basis in accordance with Condition 5.A.4. (Ref.: APC -S-6, Section III.A.3 and 40 CFR 63.266)

(c) For Emission Point AA-013, the permittee shall submit a semiannual monitoring system performance report including a summary of the average scrubbing liquid supply pressure and the scrubbing liquid flow rate in accordance with Condition 5.A.4. Monitoring of the scrubbing liquid flow rate is an EPA approved alternative to monitoring pressure loss across the scrubber as set forth in 40 CFR 60.284(b). (40 CFR 60.284(b) and 40 CFR 63.864(a)(2))

(d) For Emission Point AA-013, the permittee shall submit a semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period in accordance with Condition 5.A.4. (Ref.: APC -S-6, Section III.A.3)

(e) For Emission Point AA-013, the permittee shall submit a report of the amount of on-site generated used oil burned as fuel, determined monthly and based on a 12-month rolling total, in accordance with Condition 5.A.4. (Ref.: APC -S-6, Section III.A.3)

(f) For Emission Point AA-013, the permittee shall submit a semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s) taken for the previous 6-month period in accordance with Condition 5.A.4.

5.C.9 REPORTING REQUIREMENTS FOR EMISSION POINT AA-015

(a) For Emission Point AA-015, the permittee shall submit a quarterly report of any periods of excess opacity emissions and monitoring system performance reports as specified in 40 CFR 60.45(g). These reports shall be submitted within thirty (30) days of the close of each calendar quarter. (Ref.: 40 CFR 60.45(g))

(b) For Emission Point AA-015, the permittee shall submit a report of the hours of incineration of NCG gases, on both a daily and an annual (calendar year) basis in accordance with Condition 5.A.4 for the most recent semiannual period. (Ref.: APC-S-6, Section III.A.3)

(c) For Emission Point AA-015, the permittee shall submit a semiannual report summarizing any O_2 warning alarm occurrences, certification that the O_2 monitor(s) have been maintained and calibrated in accordance with the manufacturer specifications, and a summary of any corrective action(s) taken for the previous 6-month period in accordance with Condition 5.A.4.

(d) For Emission Point AA-015, the permittee shall submit a semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period in accordance with Condition 5.A.4. (Ref.: APC -S-6, Section III.A.3)

5.C.10 REPORTING REQUIREMENTS FOR EMISSION POINT AA-016

(a) For Emission Point AA-016, submit semiannual reports of the periods in excess of 5 minutes in which the combustion temperature at the point of incineration is less than 1200ºF. The reports should include the date of the event, the time of the event, and the duration of the event, and must be submitted in accordance with Condition 5.A.4. It will not be indicative of a violation of 40 CFR 60.11(d) if the facility can demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess

emissions. (Ref.: APC-S-6, Section III.A.3 and 40 CFR 60.284(e)(2))

(b) For Emission Point AA-016, the permittee shall submit a semiannual report summarizing the hours of incineration of NCG in the incinerator in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)

(c) For Emission Point AA-016, the permittee shall submit a report indicating periods of excess emissions for all 12-hour averages of TRS above 5 ppm by volume total in accordance with Condition 5.A.4. It will not be indicative of a violation of 40 CFR 60.11(d) if the facility can demonstrate that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions. (Ref.: 40 CFR 60.284(d) & (e))

(d) For Emission Point AA-016, the permittee shall submit a semiannual report summarizing the amount(s) and type(s) of fuels combusted for the preceding 6-month period in accordance with Condition 5.A.4. (Ref.: APC -S-6, Section III.A.3)

5.C.11 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-024

For Emission Point AA-024, the permittee shall submit a semiannual report summarizing the hours of operation in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)

5.C.12 REPORTING REQUIREMENTS FOR EMISSION POINTS AA-025, AA-026, AA-027 AND AA-028

(a) For Emission Points AA-025, AA-026, AA-027, and AA-028, if the permittee elects to use a control device, technique, or an alternative parameter other than those specified in Section 5.B, the permittee must obtain prior approval from MDEQ. (Ref.: 40 CFR 63.453(m))

(b) For Emission Points AA-025, AA-026, AA-027, and AA-028, to establish or reestablish a value for which there is required monitoring, the permittee shall submit a rationale in accordance with 40 CFR 63.453(n) and Section 5.B. (Ref.: 40 CFR 63.453(n))

(c) For Emission Points AA-025, AA-026, AA-027, and AA-028, the permittee shall submit a semiannual report of compliance with the Site-Specific Inspection Plan in accordance with Condition 5.A.4. The report should include a summary of the information specified in 3.D. (Ref.: 40 CFR 63.454(b) & APC-S-6, Section III.A.3)

(d) For Emission Points AA-025, AA-026, AA-027, and AA-028, the permittee shall submit a semiannual report of any corrective action(s), violation, and/or maintenance required as detailed in Section 5.B. The report should be submitted in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)

(e) For Emission Points AA-025, AA-026, AA-027, and AA-028, the permittee shall submit a semiannual report indicating periods of excess emissions for each applicable CMS or Control Device used to demonstrate compliance. The report should be submitted in accordance with Condition 5.A.4. Each excess emission report shall include the information required in 40 CFR 63, Subpart A. (Ref.: 40 CFR 63.453 & APC-S-6, Section III.A.3)

(f) For Emission Points AA-025 and AA-027, the permittee shall submit a semiannual report of compliance with the inspection requirements set forth in Section 5.B. The report should be submitted in accordance with Condition 5.A.4. (Ref.: 40 CFR 63.453(k) & APC-S-6, Section III.A.3)

5.C.13 REPORTING REQUIREMENTS FOR EMISSION POINT AA-028

(a) For Emission Point AA-028, the permittee shall submit a semiannual report of compliance with the requirements set forth in Section 5.B. The report should be submitted in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)

(b) For Emission Point AA-028, the permittee shall submit a semiannual report of compliance with the requirements set forth in Section 5.B. The report should be submitted in accordance with Condition 5.A.4. (Ref.: APC-S-6, Section III.A.3)

5.C.14 For Emission Points AA-010, AA-013, AA-015, and AA-016, the permittee shall submit a semiannual report summarizing excess emissions or excursions of monitored parameters as set forth in the CAM Plan(s) in Section 5.B. (Ref.: 40 CFR 64)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.A.1 As an alternative to Condition 3.B.19(b) for Emission Point AA-025, the control device used to reduce total HAP emissions from each emission system, when utilizing Emission Point AA-016 as the control device, may also demonstrate compliance by operating the incinerator (AA-016) at a minimum temperature of 1600°F with a minimum residence time of 0.75 seconds. (Ref.: 40 CFR 63.443(d)(3))

6.A.2 When choosing to comply with Condition 6.A.1, the facility must maintain a log record of the date and time upon which compliance with the alternative operating scenario commences in accordance with APC-S-6, Section 3.A.9(a). The facility must comply with all applicable requirements set forth in NESHAP Subpart S while utilizing this alternative compliance option. In addition, the facility must record the date and time upon which compliance returns to the primary compliance method specified in 3.B.19(b). (Ref.: APC-S-6, Section III.A.9)

6.A.3 When choosing to comply with Condition 6.A.1, the permittee shall summarize the conditions for using the alternative method in the semiannual report submitted in accordance with 5.A.4.

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 MDEQ shall provide a copy upon request by the permittee.

7.1 If the permittee stores or transports class I or class II substances, the permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

(a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if being introduced into interstate commerce pursuant to 40 CFR 82.106.

(b) The placement of the required warning statement must comply with the requirements pursuant to 40 CFR 82.108.

(c) The form of the label bearing the required warning statement must comply with the requirements pursuant to 40 CFR 82.110.

(d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR 82.112.

7.2 If the permittee performs any of the activities described below, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliance must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC - like appliance" is defined at 40 CFR 82.152.)

(e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.

(f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.

7.3 If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

7.4 If the permittee performs a service on motor (fleet) vehicles and if this service involves an ozone-depleting substance (refrigerant) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

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

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

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**
CMS	**Continuous Emissions Monitoring System**
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**
HVLC	**High Volume, Low Concentration**
lbs/hr	**Pounds per Hour**
LVHC	**Low Volume, High Concentration**
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**
NMVOC	**Non-Methane Volatile Organic Compounds**
NO_x	**Nitrogen Oxides**
NSPS	**New Source Performance Standards, 40 CFR 60**
O&M	**Operation and Maintenance**
PM	**Particulate Matter**
PM_{10}	**Particulate Matter less than 10 μm in diameter**
ppm	**Parts per Million**
PSD	**Prevention of Significant Deterioration, 40 CFR 52**
SIP	**State Implementation Plan**
SO_2	**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

NESHAP SUBPART S, STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM THE PULP AND PAPER INDUSTRY

APPENDIX C

40 CFR 63

NESHAP SUBPART MM, STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM CHEMICAL RECOVERY COMBUSTION SOURCES AT KRAFT, SODA, SULFITE, AND STAND-ALONE SEMICHEMICAL PULP MILLS

APPENDIX D

40 CFR 60

NSPS SUBPART D, STANDARDS FOR FOSSIL FUEL FIRED STEAM GENERATORS FOR WHICH CONSTRUCTION COMMENCED AFTER AUGUST 17, 1971

APPENDIX E

40 CFR 60

NSPS SUBPART BB, STANDARDS FOR KRAFT PULP MILLS