

Statement of Basis
WestRock – Demopolis Mill
Facility No. 105-0001
Significant Title V Mod

Introduction

The Department received an application on November 1, 2019, from WestRock – Demopolis Mill for a proposal to modify their Title V Operating Permit to include the recent changes to 40 CFR Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicheical Pulp Mills. The facility submitted additional comments on December 28, 2019. The Mill’s current Title V Permit was issued on January 1, 2016, and expires on December 31, 2020. The EPA published Subpart MM amendments on October 11, 2017, with a compliance date of October 11, 2019. The following units at the Demopolis Mill are subject to Subpart MM requirements:

- No. 3 Lime Kiln
- No. 3 Recovery Furnace
- No. 3 Smelt Dissolving Tank

Also the Demopolis Mill is requesting to remove the Process Pond Pump Non-Emergency Engine from their Title V Permit.

The Mill has proposed the following revisions and conditions in order to incorporate the amendments to Subpart MM:

No. 3 Lime Kiln

- For parametric monitoring, limit the times corrective actions are taken or violations are recorded to times when lime mud is fed
- Add the startup and shutdown exception for maintaining wet scrubber pressure drop
- Include a proviso stating monitoring data recorded during periods of unavoidable CMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high level adjustments shall not be included in any data average computed
- Add the requirement to conduct periodic performance testing, with the initial test to be conducted by October 13, 2020, and thereafter no longer than 5 years following the previous test
- Add the requirement to estimate the quantity of each regulated pollutant emitted over the emission limit for each failure to meet an operation limit
- Reduce the frequency for submitting excess emissions reports from quarterly to semiannually
- Add electronic reporting requirements for excess emissions reports and performance tests through EPA’s Compliance and Emissions Data Reporting Interface (CEDRI)

No. 3 Recovery Furnace

- For parametric monitoring, limit the times corrective actions are taken or violations are recorded to times when spent pulping liquor is fed
- Reduce the opacity excess emissions allowance from 6 percent to 2 percent

- Add reference to requirements for proper operation of the continuous opacity monitoring system (COMS)
- Include a proviso stating monitoring data recorded during periods of unavoidable CMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high level adjustments shall not be included in any data average computed
- Add the requirement to conduct periodic performance testing, with the initial test to be conducted by October 13, 2020, and thereafter no longer than 5 years following the previous test
- Add the requirement to estimate the quantity of each regulated pollutant emitted over the emission limit for each failure to meet an operation limit
- Add a proviso to maintain proper operation of the electrostatic precipitator (ESP) automatic voltage control (AVC)
- Reduce the frequency for submitting excess emissions reports from quarterly to semiannually
- Add electronic reporting requirements for excess emissions reports and performance tests through EPA's Compliance and Emissions Data Reporting Interface (CEDRI)

No. 3 Smelt Dissolving Tank

- For parametric monitoring, limit the times corrective actions are taken or violations are recorded to times when spent pulping liquor is fed
- Add the startup and shutdown exception for maintaining wet scrubber pressure drop
- Include a proviso stating monitoring data recorded during periods of unavoidable CMS breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high level adjustments shall not be included in any data average computed
- Add the requirement to conduct periodic performance testing, with the initial test to be conducted by October 13, 2020, and thereafter no longer than 5 years following the previous test
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Admin Modifications

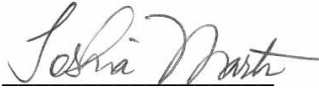
WestRock – Demopolis is also proposing the removal of the Process Pond Pump Non-Emergency Engine as an administrative modification to their Title V permit.

Title V Modification

The proposed changes should be classified as a significant modification to the Title V Operating Permit. A 30 day public comment period and a 45 day EPA comment period would be required. The modifications would be incorporated into the Title V permit upon completion of the EPA review.

Recommendations

I recommend that WestRock – Demopolis Mill's Title V permit be modified as attached.



Toshia Martin
Industrial Chemicals Section
Chemical Branch

January 8, 2020

Date