

**Preliminary Determination**  
Boise White Paper, LLC – Jackson Mill  
102-0001  
No. 1 and No. 3 Paper Machines Modification

Boise White Paper, LLC (the Mill), located in Jackson, Alabama (Clarke County), is a major source under both the Title V operating program and Prevention of Significant Deterioration (PSD) program. On December 31, 2020, Boise White Paper, LLC (Boise) submitted an Air Permit application to the Department. The purpose of the permit is to propose to convert the existing No. 1 and No. 3 Paper Machines to the manufacture of unbleached Kraft containerboard using virgin unbleached Kraft pulp, recycled pulp, or a mixture of virgin and recycled unbleached pulp. The Mill also proposed to construct a new 1,250 air-dry ton per day (ADTPD) Recycled Fiber Plant, to modify the existing Deink Plant to process old corrugated container (OCC) and double-lined Kraft (DLK) recycled pulp, and to convert the existing pre-bleach decker and D<sub>100</sub> and D-1 stage bleach washers into a second brown stock washer line.

The proposed modifications will result in a net increase in steam consumption, which will be provided by the existing No. 4 and No. 5 Power Boilers. In January 1995 and January 1996, respectively, the No. 4 and No. 5 Power Boilers were permitted as new sources prior to construction in accordance with the Prevention of Significant Deterioration (PSD) rules as promulgated in ADEM Admin. Code R. 335-3-14-.04. Air quality analysis, PSD review, and modeling were conducted for both sources. The No. 4 and No. 5 Power Boilers, which are not being modified have their emissions excluded from future permitting analysis, having been previously permitted at their maximum capacity through either a PSD review or PSD-avoidance analysis.

The Paper Machine Modification will consist of the following changes to the Mill:

- No. 1 Paper Machine Conversion
  - Specific machine modification will be determined after the new OCC plant comes online
- No. 3 Paper Machine Conversion
  - Removal of the existing size press
  - Upgrade of the machine wet end
  - Upgrade of the machine dry end
  - Upgrade of the winder section
  - Conversion of the J-3 Bleached High Density Pulp Chest (1,000-ton capacity) to an unbleached Kraft high density pulp storage chest
- Recycle Fiber Plant Installation
  - Install a 1,000-ton high density storage tank
- Deink Plant Modification
- Conversion of existing pre-bleach decker, D<sub>100</sub> bleach washer, and D-1 bleach washer into the No. 2 Brown Stock Washer System
- Retirement of existing Bleach Plant Towers and Chlorine Dioxide Plant with the implementation of the Paper Machines Modification project
- Installation of a gravel parking lot which will consist of 100 parking spaces and a truck-turnaround



### Emissions

The Mill has determined its baseline emissions in accordance with ADEM Administrative Code 335-3-14-.04(2)(uu)2, which allows baseline emissions to be set for each pollutant during a consecutive 24-month period in the 10-year contemporaneous period. The Mill calculated the baseline emissions based on the period of January 2013 to December 2014.

The Mill has elected to use the hybrid applicability test due to this project involving multiple types of emission units. The applicability test will use the actual-to-projected actual test for the existing units and the actual-to-potential test for the new units, which will be installed as a result of this project. The emissions from the sources affected by the proposed project have been determined based on the expected increases in utilization.

The No. 2 Brown Stock Washer Line will be using the existing pre-bleach decker, D100 bleach washer, and D-1 bleach washer. For the No. 2 Brown Stock Washer Line, actual-to-projected actual tests were used because these washers and filtrate tanks were in service as bleach plant washers and filtrate tanks, and their baseline emissions are included in the line items for Bleach Plant Filtrate Tank and Bleach Plant Scrubber. For the projected actual for the No. 2 Brown Stock Washer Line, the Mill assumed 1% HVLC venting rather than the potential to emit (PTE) of 4% HVLC venting because the Mill has not exceeded 1% HVLC venting in more than 10 years. EPA promulgated the 4% allowance to those that do not have a backup HVLC control device. The Mill plans to install an HVLC capture system to route gases from the No. 2 Brown Stock Washer Line to the Combination Boiler or the Recovery Furnace for incineration. The venting will be monitored through the Mill's HVLC system.

As a result of these proposed modifications, there would be an increase in capacity of the No. 1 Paper Machine, No. 3 Paper Machine, Deink Plant, and No. 2 Brown Stock Washer System, which would cause an increase in emissions of several pollutants. The No. 4 and No. 5 Power Boilers are excluded from the emissions because these units have been permitted as part of the PSD permitting process in 1995 and 1996, respectively.

A summary of the emissions related to this project can be seen in Table 1 below. This project will require a PSD review for VOC and CO<sub>2e</sub>.

**Table 1: Proposed Project Emissions Summary**

<b>Pollutant</b>	<b>Baseline Actual Emissions (TPY)</b>	<b>Projected Actual Emissions (TPY)</b>	<b>Difference (TPY)</b>	<b>PSD Threshold (TPY)</b>	<b>PSD Applicable</b>
PM	16.07	26.23	10.16	25	No
PM <sub>10</sub>	20.76	23.56	2.80	15	No
PM <sub>2.5</sub>	19.37	17.23	-2.14	10	No
SO <sub>2</sub>	0.00	1.08	1.08	40	No
NO <sub>x</sub>	0.00	0.00	0.00	40	No
CO	185.19	0.00	-185.19	100	No
<b>CO<sub>2</sub>e (GHG)</b>	<b>0.00</b>	<b>216,039</b>	<b>216,039</b>	<b>75,000</b>	<b>Yes</b>
<b>VOC</b>	<b>68.77</b>	<b>473.20</b>	<b>404.43</b>	<b>40</b>	<b>Yes</b>
TRS	1.36	2.77	1.41	10	No
H <sub>2</sub> S	0.00	0.22	0.22	10	No
Pb	0.0000	0.0009	0.0009	0.6	No

**NSPS/NESHAP**

Implementation of this project will potentially make the following NSPS's applicable for the modified sources at the Mill:

- Subpart Db, Standards of Performances for Industrial-Commercial-Institutional Steam Generating Units
- Subpart BB, Standards of Performance for Kraft Pulp Mills
- Subpart BBa, Standards of Performance for Kraft Pulp Mills

Subpart Db applies to fossil fuel fired steam generating units for which construction commenced after June 19, 1984 and have a maximum design heat input capacity greater than 100 MMBtu/hr. The No. 4 and No. 5 Power Boilers are currently subject to Subpart Db with BACT limits for NO<sub>x</sub> and CO. The No. 4 and No. 5 Power Boilers will experience an increase in steam demand due to the proposed project, but are not considered a modification according to 40 CFR 60.14(e)(2) because the increase in steam demand can be accomplished without a capital expenditure on the Mill. The Mill will continue to comply with the currently applicable provisions of Subpart Db after completion of this project.

Subpart BB applies to digester systems, brown stock washer systems, multiple-effect evaporator systems, condensate stripper systems, recovery furnaces, smelt dissolving tanks, and lime kilns for which construction, reconstruction, or modification commenced after September 24, 1976 and before May 23, 2013. The proposed No. 2 Brown Stock Washer Line is an affected source due to the pre-bleach decker, D100 bleach washer, and D-1 bleach washer having been constructed in 1996. Therefore, Subpart BB will apply to this project.

Subpart BBa applies to digester systems, brown stock washer systems, multiple-effect evaporator systems, condensate stripper systems, recovery furnaces, smelt dissolving tanks, and lime kilns for which construction, reconstruction, or modification commenced after May 23, 2013. 40 CFR Part



60.14 defines a modification as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. Because the emissions of total reduced sulfur (TRS) from the proposed No. 2 Brown Stock Washer Line will be controlled by the HVLC system, there will not be an increase in short-term TRS emissions from this unit. The proposed modifications do not constitute "reconstruction" since the fixed capital cost of these modifications are well below the 50% threshold. Therefore, Subpart BBa will not apply to this project.

Implementation of this project will potentially make the following NESHAPs applicable for the modified sources at the Mill:

- Subpart S, National Emission Standards for Hazardous Air Pollutants from Pulp and Paper Industry
- Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills
- Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Subpart S applies to mills that are major HAP sources. Since the Mill is a major source of HAPs, Subpart S already applies to certain processes (batch digester 6, brown stock washer system, and multiple-effect evaporator system). There will be no changes in requirements or standards as a result of this project, and the Mill will continue to comply with Subpart S.

Subpart MM applies to mills that are major HAP sources. Since the Mill is a major source of HAPs, Subpart MM already applies to certain processes (recovery furnace, smelt dissolving tank, and lime kiln). There will be no changes in requirements or standards as a result of this project, and the Mill will continue to comply with Subpart MM.

Subpart DDDDD establishes emission limits, work practice standards, and testing, monitoring, reporting, and recordkeeping requirements that apply to boilers and process heaters located at major sources of HAP. No. 4 and No. 5 Power Boilers are subject to the tune-up requirements of Subpart DDDDD. There will be no changes in requirements or standards as a result of this project, and the Mill will continue to comply with Subpart DDDDD.

### **BACT**

BACT is an emission limitation based on the maximum degree of reduction of each pollutant subject to the regulation under the PSD program, which the Department determines is achievable by the source. The determination is made on a case-by-case basis, taking into account energy, environmental impacts and other costs. The emission limitation limits the amount of pollutant which can be emitted or sets equipment specifications, which are individualized for a particular source. The Mill has elected to use the "top-down" approach in determining BACT for this proposed project. This approach identifies the most stringent or top level technology and emission limits for the process in question, and requires the applicant to provide a basis for elimination of this technology. Elimination may be based on technical feasibility and/or economic



considerations. The Mill presented all this information for each process that had to perform a BACT analysis as part of this project. The Department reviewed the listed technologies for each source to ensure that each technology that was rejected due to technical feasibility was justifiable. Each section of the project that will be subject to the PSD review will be discussed below and BACT limitations will be presented for each of the pollutants that are applicable.

BACT requires a review of all new or modified emission units from which there is an emissions increase of pollutants subject to PSD review. According to ADEM Administrative Code R. 335-3-14-.04(9)(c), "a major modification shall apply BACT for each regulated NSR pollutant for which it would result in a significant net emissions increase at the source. This requirement applies to each proposed emissions unit at which a new increase in the pollutant would occur as a result of a physical change or change in the method of operation in a unit." The pollutant of concern for BACT review for this proposed project is VOC. As a result, the No. 1 and 3 Paper Machines and the new Recycle Fiber Plant were considered in the BACT analysis.

#### **No. 4 and No. 5 Power Boilers**

Even though the emissions from No. 4 and No. 5 Power Boilers are not being included in this exercise, it should be noted that even if those emissions were included, a BACT analysis would not be necessary for these units because they are not being modified.

#### **No. 1 and No. 3 Paper Machines**

The Mill proposed to modify the paper machines to produce unbleached Kraft paper using virgin unbleached Kraft pulp, recycled pulp, or a combination of virgin and recycled pulp furnish. As part of the project, the Mill is proposing to install equipment to achieve the desired operational capacity for the No. 1 and No. 3 Paper Machines of 600 machine-dry tons per day and 2,500 machine-dry tons per day, respectively. The pollutant of concern is VOC.

The Mill has ranked all the technically feasible options of the control of VOC as follows:

Control Method	Control Efficiency	Rank
Thermal Oxidation	98%	1
Use of Low VOC Compounds (Good Operating Practices)	Varies	2

The Mill evaluated the cost effectiveness of the proposed control methods. The cost effectiveness compares the costs and emissions performance level of a control option to those of the next most stringent option. The cost effectiveness associated with thermal oxidation for controlling 98% of the projected 393.3 tons per year of VOC amounts to \$25,400/ton.

It is not economically feasible to install the control method of thermal oxidation on the No. 1 and 3 Paper Machines for the control of VOC emissions from the paper machines. The Mill has a "New Substance Review Program" in place which reviews new substances before they are purchased to determine the VOC content and assess if an alternative substance with a lower VOC content could be used. This program helps to ensure the Mill is using the lowest VOC-containing materials in this process. Since the Mill has a method in place for using the low VOC compounds, a cost analysis is not required.



The Mill has proposed BACT be set to use the low VOC compounds and good operating practices with VOC emission limits of 1.26 lbs of VOC per Air- Dried Tons of Finished Product and 393.7 TPY.

#### **New Recycle Fiber Plant**

The Mill proposed to install a new recycle plant. The proposed recycle plant will be a 1,250 air-dry ton per day capacity. The pollutant of concern is VOC.

The Mill has ranked all the technically feasible options of the control of VOC as follows:

Control Method	Control Efficiency	Rank
Add-on Control Devices	95-99%	1
Good Operating Practices	Varies	2

The Mill evaluated the cost effectiveness of the proposed control methods. The cost effectiveness compares the costs and emissions performance level of a control option to those of the next most stringent option. The cost effectiveness associated with add-on control devices for controlling 95-99% of the projected 1.83 tons per year of VOC amounts to \$78,000/ton.

It is not economically feasible to install add-control devices on the proposed recycle plant for the control of VOC emissions, and the recycle plant has a low potential emissions amount (1.83 tons). The Mill has proposed BACT as good operating practices.

Table 2 summarizes the Mill's proposed BACT limitations and control technologies.

**Table 2: BACT Summary**

Source	Pollutant	Proposed BACT		
		Control Technology	Short Term Limit	Long Term Limit
No. 1 and 3 Paper Machines	VOC	Good Operating Practices/Use of Low VOC Compounds	1.26 lb/ADTFP	393.70 tpy

#### **Ambient Air Impact Analysis (Modeling)**

The memorandum found in Appendix A from the Air Division's Planning Branch addresses all dispersion modeling issues from the proposed project. As can be seen in this modeling report, the Mill would not exceed the PSD increment or the NAAQS for VOC

Even though the emissions from No. 4 and No. 5 Power Boilers are not being included in this exercise, it should be noted that even if those emissions were included, a review of prior modeling for these units indicates insignificant modeled impacts for both NO<sub>x</sub> and CO.

#### **Secondary Impacts**

There are no ozone precursors triggered by this project. As such, a soil and vegetation analysis was not performed.

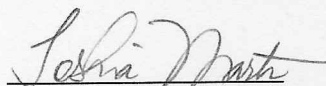


**Coastal Consistency**

The facility is not located in Mobile or Baldwin County. Therefore, the ADEM – Coastal Section was not contacted concerning the proposed project.

**Recommendation**

The analysis indicates that the proposed project would meet all the requirements of the ADEM Administrative Code R. 335-3. Therefore, I recommend that air permits 102-0001-X033 and 102-0001-X034 be issued incorporating the provisos found in Appendix B, pending the results of a 30-day public comment period.



Toshia Martin  
Industrial Chemicals Section  
Chemical Branch  
Air Division

April 8, 2021

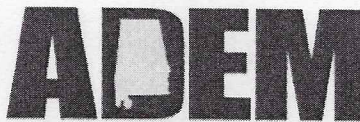
Date



# Appendix A

## Modeling Analysis





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January 10, 2021

**MEMORANDUM**

TO: Natoshia Martin *nm*  
Chemicals Section  
Energy Branch  
Air Division

FROM: Geoffrey Healan *GH*  
Meteorological Section  
Planning Branch  
Air Division

SUBJECT: Air Quality Analysis for Boise Prevention of Significant Deterioration  
Permit Application

ADEM has completed its review of an air quality analysis performed by Boise for their facility in Jackson, Alabama. The purpose of the analysis was to assess the impacts on air quality from emissions of VOC from a proposed plant expansion project. Since the project is only significant for VOC, AERMOD air dispersion modeling was not required for this project. However, a Modeled Emission Rates for Precursors (MERPs) analysis for Ozone was required since the project is significant for VOC.

**MERPs ANALYSIS:**

Precursor emission impacts for Ozone were considered and a Modeled Emission Rates for Precursors (MERPs) analysis was performed. The Ozone precursors are the pollutants VOC and NO<sub>x</sub>. If the calculations from the MERPs analyses are less than 100%, it indicates that the air quality threshold will not be exceeded and no further modeling is required. For Ozone, the following total emissions were considered: for VOC, 404.4 TPY; and for NO<sub>x</sub>, 0 TPY. Bunge used the Most Conservative (Lowest) Illustrative MERP Values (tons per year) by Precursor for 8-hour O<sub>3</sub> for the Southeastern US listed in Table 4.1 of the MERPs guidance. These values are 170 TPY for NO<sub>x</sub> and 1936 TPY for VOC. Using these values in the MERPs equation provides the following calculation:



$$(0 \text{ TPY NO}_x / 170 \text{ TPY NO}_x \text{ 8-hr daily max O}_3 \text{ MERP}) + (404.4 \text{ TPY VOC} / 1936 \text{ TPY VOC 8-hr daily max O}_3 \text{ MERP}) \times 100\% = 20.9\%.$$

This shows that the MERPs value for Ozone is below 100%, and no further analysis is required.

In addition, preconstruction monitoring requirements were addressed, and it was determined that preconstruction monitoring was not required. Ozone data provided by ADEM for the Chickasaw, Alabama Ozone monitor is included in the application.

**CONCLUSION:**

In conclusion, emissions of VOC from the proposed plant expansion project at the Boise in Jackson, Alabama, are not expected to cause or contribute to any violation of a NAAQS or PSD Increment.



# Appendix B

## Draft Permits

## AIR PERMIT

**PERMITTEE:** BOISE WHITE PAPER, LLC  
**FACILITY NAME:** BOISE WHITE PAPER, LLC  
**LOCATION:** JACKSON, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
102-0001-X033	No. 1 and 3 Paper Machines

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE: Draft**



**Boise White Paper, LLC  
JACKSON, ALABAMA  
(PERMIT NO. 102-0001-X033)  
PROVISOS**

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**1. General Permit Provisos**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. Each point of emission will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
5. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut-down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred.
6. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.

9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
13. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

14. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.



15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
16. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
17. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
18. The permittee shall submit an annual compliance certification to the Department no later than 60 days following the anniversary of the issuance of this permit or with the Annual Major Source Operating Permit certification. The compliance certification shall include the following:
  1. The identification of each term or condition of this permit that is the basis of the certification.
  2. The compliance status, whether continuous or intermittent.
  3. The method(s) used for determining the compliance status of the source, currently and over the reporting period.
  4. Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

## Paper Machines Provisos

### Regulations

#### 1. Applicability

1. This source is subject to the applicable requirements of ADEM Admin. Code R 335-3-16-.03, "Major Source Operating Permits".
2. This source is subject to the requirements of ADEM Admin. Code 335-3-14-.04(9) Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) "work practice standard for volatile organic compounds.

Rule 335-3-16-.03

Rule 335-3-14-.04(9)

#### 2. Emission Standards

1. Such that the standards for Best Available Control Technology (BACT) shall be met, the volatile organic compounds emissions shall be controlled by the use of low-VOC water sources for the paper machine including but not limited to mill supply water (cold mill water, and warm mill water), non-direct contact condensates, clean condensates, well water, dematerialized water or white water. The following standards shall apply:

Rule 335-3-14-.04

Pollutant	Rate Based Limit	Mass Based Limit
VOC	1.26 lb/ADTFP	393.7 tpy

#### 3. Compliance and Performance Test Methods and Procedures

1. This source is subject to no additional specific requirements other than those listed in the General Permit Provisos.

#### 4. Emission Monitoring

1. This source is subject to no additional specific requirements other than those listed in the General Permit Provisos.

Rule 335-3-14-.04

#### 5. Recordkeeping and Reporting Requirements

1. This source shall maintain and submit the following records to the Department after construction of this unit:
  - a. Calculate, and maintain a record of the monthly VOC emissions, in tons per year, and make this information available for review upon inspection;
  - b. Submit to the Department on a semi-annual basis a report containing the following information:
    - (1) The name, address and telephone number of the facility
    - (2) All information required in the pre-project record for this source
    - (3) The previous six monthly VOC emissions calculated per 5.1.a in Appendix C.

Rule 335-3-14-.04



## AIR PERMIT

**PERMITTEE:** BOISE WHITE PAPER, LLC  
**FACILITY NAME:** BOISE WHITE PAPER, LLC  
**LOCATION:** JACKSON, AL

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
102-0001-X034	No. 2 Brown Stock Washer Line

*In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.*

**ISSUANCE DATE: Draft**

**Boise White Paper, LLC  
JACKSON, ALABAMA  
(PERMIT NO. 102-0001-X034)  
PROVISOS**

---

**1. General Permit Provisos**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. Each point of emission will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.
5. All air pollution control equipment shall be operated at all times while this process is operational. In the event of scheduled maintenance, unscheduled maintenance, or a breakdown of the pollution control equipment, the process shall be shut-down as expeditiously as possible (unless this act and subsequent re-start would clearly cause greater emissions than continuing operations of the process for a short period). The Department shall be notified of all such events within 24 hours. The notification shall include all pertinent facts, including the duration of the process operating without the control device and the level of excess emissions which have occurred.
6. This process, including all air pollution control devices and capture systems for which this permit is issued, shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
7. This permit expires and the application is cancelled if construction has not begun within 24 months of the date of issuance of the permit.
8. On completion of construction of the device(s) for which this permit is issued, written notification of the fact is to be submitted to the Chief of the Air Division. The notification shall indicate whether the device(s) was constructed as proposed in the application. The device(s) shall not be operated until authorization to operate is granted by the Chief of the Air Division. Failure to notify the Chief of the Air Division of completion of construction and/or operation without authorization could result in revocation of this permit.



9. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
10. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
11. Nothing in this permit or conditions thereto shall negate any authority granted to the Air Division pursuant to the Alabama Environmental Management Act or regulations issued thereunder.
12. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
13. The Air Division must be notified in writing at least 10 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- a. The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- b. A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- c. A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- d. A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Air Division within 30 days of the actual completion of the test, unless an extension of time is specifically approved by the Air Division.

14. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.



15. Precautions shall be taken by the permittee and its personnel to ensure that no person shall ignite, cause to be ignited, permit to be ignited, or maintain any open fire in such a manner as to cause the Department's rules and regulations applicable to open burning to be violated.
16. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
17. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.
18. The permittee shall submit an annual compliance certification to the Department no later than 60 days following the anniversary of the issuance of this permit or with the Annual Major Source Operating Permit certification. The compliance certification shall include the following:
  1. The identification of each term or condition of this permit that is the basis of the certification.
  2. The compliance status, whether continuous or intermittent.
  3. The method(s) used for determining the compliance status of the source, currently and over the reporting period.
  4. Other facts the Department may require to determine the compliance status of the source.

The compliance certification shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.



## No. 2 Brown Stock Washer Line Provisos

	Regulations
<b>1. Applicability</b>	
1. This source is subject to the applicable requirements of ADEM Admin. Code R 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This source is subject to federal New Source Performance Standards, Subpart BB and 40 CFR Subpart A, General Provisions.	Rule 335-3-10-.02(28)
3. This source is subject to federal National Emission Standards for Hazardous Pollutants General Provisions as provided for in Table 1 of Subpart S and Subpart S (See Provisos for "Pulping System Processes" and "Enclosures and Closed Vent Systems" for additional requirements).	Rule 335-3-11-.06(1), (18)
<b>2. Emission Standards</b>	
1. All gases discharged from the Brown Stock Washers and Digester No. 6 that contain total reduced sulfur in excess of 5 parts per million on a dry basis corrected to 10% oxygen shall be incinerated in the lime kiln or combination fuel boiler subjecting the gases to a minimum temperature of 1200 degrees Fahrenheit for at least 0.5 seconds.	Rule 335-3-10-.02(28)
2. See Provisos for "Pulping System Processes", "Process Condensates", and "Enclosures and Closed Vent Systems" for additional requirements.	
<b>3. Compliance and Performance Test Methods and Procedures</b>	
1. See Provisos for "Pulping System Processes", "Process Condensates", and "Enclosures and Closed Vent Systems" for additional requirements.	
<b>4. Emission Monitoring</b>	
1. See Provisos for "Pulping System Processes", "Process Condensates", and "Enclosures and Closed Vent Systems" for additional requirements.	
<b>5. Recordkeeping and Reporting Requirements</b>	
1. See Provisos for "Pulping System Processes", "Process Condensates", and "Enclosures and Closed Vent Systems" for additional requirements	