

**Statement of Basis
International Paper – Prattville Mill
Facility No. 201-0001
Significant Title V Mod**

Introduction

The Department received an application on March 8, 2019, from International Paper - Prattville 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 Semichemical Pulp Mills. The Mill's current Title V Permit was issued on November 12, 2015, and expires on December 31, 2021. The EPA published Subpart MM amendments on October 11, 2017, with a compliance date of October 11, 2019. The following units at the Prattville Mill are subject to Subpart MM requirements:

- No. 1 and 2 Lime Kiln
- No. 1 and 2 Recovery Furnace
- No. 1 and 2 Smelt Dissolving Tank

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

No. 1 and 2 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. 1 and 2 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
- Change the compliance determination with the opacity limit from Method 9 to a 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. 1 and 2 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
- Add the requirement to estimate the quantity of each regulated pollutant emitted over the emission limit for each failure to meet an operation limit
- Include the alternative monitoring of fan amps instead of pressure drop for the No. 2 Smelt Dissolving tank scrubber
- 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)

ADEM granted an alternative monitoring request on January 22, 2003, for the Mill to monitor fan amperage in lieu of pressure drop on the No. 2 Smelt Dissolving Tank dynamic scrubber. Pursuant to 40 CFR 63.864(j)(5)(i)(A) and Subpart MM, "minimum fan amperage operating limit must be set as the lowest of the 1-hour average fan amperage values associated with each test run demonstrating compliance with the applicable emission limit." Establishing the operating limit of a scrubber operating at ambient pressure would be difficult to achieve due to fluctuations of atmospheric pressure. Historically, the Mill has set the fan amperage operating limit as the "no load" amperage, where the fan is operating but there is no exhaust gas flow through the scrubber. The Mill intends to continue to monitor fan amperage in lieu of pressure drop across the No. 2 Smelt Tank scrubber and has submitted a request to the EPA Region 4 proposing an alternative method for establishing a fan amperage operating limit. This proposal would establish an operating limit as the midpoint between "no load" amperage and the lowest fan amperage recorded during a performance test.

RICE Units

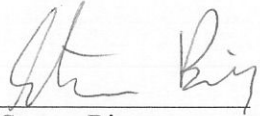
The Mill would also like to incorporate the No. 1 Fire Pump Engine – Replacement (Air permit Z033), issued on August 26, 2016, and the No. 2 Fire Pump Engine - Replacement (Air permit Z035), issued on November 9, 2018, into the Title V permit.

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 International Paper - Prattville Mill's Title V permit be modified as attached.



Steven Bissey
Industrial Chemicals Section
Chemical Branch

September 6, 2019
Date

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