Statement of Basis
International Paper – Riverdale Mill
Facility No. 104-0003
Significant Title V Mod

Introduction

The Department received an application on March 19, 2019, from International Paper - Riverdale 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 January 19, 2018, and expires on December 31, 2022. The EPA published Subpart MM amendments on October 11, 2017, with a compliance date of October 11, 2019. The following units at the Riverdale Mill are subject to Subpart MM requirements:

- No. 1 and 2 Recovery Furnace
- No. 1 and 2 Smelt Dissolving Tank
- No. 3 Lime Kiln

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

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)
- Add clarification for COMS data recording requirements
- 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 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
- 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 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 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 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)

ADEM granted an alternative monitoring request on January 22, 2003, for the Mill to monitor fan amperage in lieu of pressure drop on the Nos. 1 and 2 Smelt Dissolving Tank dynamic scrubbers. 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 smelt tank scrubbers 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.

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 - Riverdale Mill's Title V permit be modified as attached.

Steven Bissey
Industrial Chemicals Section
Chemical Branch

September 16, 2019
Date

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