



MAJOR SOURCE OPERATING PERMIT

PERMITTEE: WestRock Coated Board, LLC

FACILITY NAME: WestRock Coated Board, LLC – Mahrt Mill

FACILITY/PERMIT NO.: 211-0004

LOCATION: Cottonton, AL

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.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: November 30, 2020

Effective Date: January 1, 2021

Most Recent Modification: DRAFT

Expiration Date: December 31, 2025

No. 1 Smelt Tank Provisos

State Only Enforceable Provisos	Regulations
Applicability	
1. This source is subject to the requirements of ADEM Admin. Code 335-3-5-.04(7) total reduced sulfur from kraft pulp mill smelt tanks.	Rule 335-3-5-.04(7)
Emission Standards	
1. Total reduced sulfur emissions shall not exceed 0.033 pounds per ton of black liquor solids. If an owner or operator demonstrates to the satisfaction of the Director that emissions in excess of the levels otherwise authorized in this regulation occur as a result of properly performed startups, shutdowns or unavoidable malfunctions these emissions will not constitute a violation.	Rule 335-3-5-.04
Compliance and Performance Test Methods and Procedures	
1. Compliance with the total reduced sulfur emission limit shall be determined in accordance with 40 CFR Part 60 Method 16, 16A or 16B or other method approved by the Department.	Rule 335-3-14-.02
Emission Monitoring	
1. A total reduced sulfur emission test shall be performed at least once per every five years.	Rule 335-3-14-.02
2. For total reduced sulfur periodic monitoring, if any three-hour block average liquor firing rate is greater than 110 percent of its value set by the required complying periodic test or a complying test approved by the Department, the feed rate is to be lowered until compliance is successfully demonstrated at the higher rate.	Rule 335-3-16-.05
3. For total reduced sulfur periodic monitoring, if any twelve-hour block average scrubber liquid makeup flow rate is less than 90 percent of its respective average value set by the required complying periodic test or a complying test approved by the Department, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours.	Rule 335-3-16-.05
Recordkeeping and Reporting Requirements	
1. A total reduced sulfur emission test report shall be submitted to the Department at least once every 5 years.	Rule 335-3-14-.02
2. Records of all twelve-hour block average scrubber liquid makeup flow rates shall be made and maintained on file available for inspection for at least five years.	Rule 335-3-16-.05

No. 2 Smelt Tank Provisos

3. Compliance with the sulfur dioxide emission limit shall be determined in accordance with 40 CFR Part 60 Method 6 or other method approved by the Department. Rule 335-3-14-.02

4. Compliance with the opacity limit shall be determined in accordance with the 40 CFR Part 60 Method 9. Rule 335-3-4-.01

Emission Monitoring

1. A particulate matter emission test shall be performed at least once per year. Rule 335-3-14-.02

2. A total reduced sulfur emission test shall be performed at least once every five years. Rule 335-3-14-.02

3. For particulate matter, total reduced sulfur and sulfur dioxide periodic monitoring, if any three-hour block average liquor firing rate is greater than 110 percent of its value set by a required complying periodic test or a complying test approved by the Department, the feed rate is to be lowered until compliance is successfully demonstrated at the higher rate. Rule 335-3-16-.05

4. For particulate matter periodic monitoring, if any three-hour block average total liquid flow to the scrubber is less than the operational parameter limits set by the required complying periodic test or a complying test approved by the Department or if fan amperage readings indicate the fan is not operating, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours. Corrective action can include completion of transient startup and shutdown conditions as expediently as possible. Rule 335-3-11-.06(1) and (38)

5. For total reduced sulfur periodic monitoring, if any twelve-hour block average scrubber liquid makeup flow rate is less than 90 percent of its respective average value set by the required complying periodic test or a complying test approved by the Department, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours. Rule 335-3-16-.05

6. Pursuant to 40 CFR Part 63, Subpart MM, the facility shall monitor the scrubber total liquid supply flow rate (combined flow to the fan and lower zone spray nozzles) and the fan amperage. The parametric monitoring system shall meet the requirements listed in 40 CFR 63.8(c). Rule 335-3-11-.06(1) and (38)

Monitoring of the flow rate and fan amperage is an approved alternative to the requirements listed in 40 CFR 63.864(e)(10).

This unit shall not have 6 or more 3-hour average parameter values within any 6-month reporting period that are outside the range of values established in accordance with 40 CFR 63.864 (j) and (k).

No more than one exceedance will be attributed in any given 24-hour period.

No. 2 Smelt Tank

Provisos

7. Pursuant to 40 CFR 63.864(j)(4), when confirming or reestablishing operating limits during required periodic performance tests, operating outside a previously established parameter limit during a performance test to expand the operating limit range does not constitute a monitoring exceedance.

8. A sulfur dioxide emission test shall be performed at least once every five years.

9. As specified in 40 CFR 63.8(g)(5), 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 under 40 CFR Part 63 Subpart MM.

10. As stated in 40 CFR 63.863(c)(1), the first periodic particulate matter performance test shall be performed by October 13, 2020 pursuant to 40 CFR 63.865 and every 5 years thereafter.

Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.

Rule 335-3-14-.02

Rule 335-3-11-.06(1) and (38)

Rule 335-3-11-.06(1) and (38)

Recordkeeping and Reporting Requirements

1. A particulate matter emission test report shall be submitted to the Department at least once per year.

Rule 335-3-14-.02

2. A total reduced sulfur emission test report shall be submitted to the Department at least once every five years.

Rule 335-3-14-.02

3. Records of all three-hour block average liquor firing rates shall be made and maintained on file available for inspection for at least five years.

Rule 335-3-14-.02

4. Records of all three-hour block average wet scrubber liquid flow rates and hourly fan amperage readings and all twelve-hour block average scrubber liquid makeup flow rates shall be made and maintained on file available for inspection for at least five years.

Rule 335-3-16-.05

5. A sulfur dioxide emission test report shall be submitted to the Department at least once every five years.

Rule 335-3-14-.02

6. In accordance with 40 CFR 63.866(c), the facility shall maintain the following records in addition to the general records required by 40 CFR 63.10(b)(2):

Rule 335-3-11-.06(1) and (38)

- Maintain records of parametric monitoring data required under 40 CFR 63.864, including any period when the 3-hour average scrubber liquid flow rate or scrubber fan amperage values were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, and the time corrective action was initiated and completed, and corrective action taken;