STATEMENT OF BASIS
WestRock – Stevenson Mill
Facility No. 705-0014
Title V Renewal

INTRODUCTION:

WestRock – Stevenson Mill (WRS, the Mill) has applied for a renewal of its Major Source Operating Permit (MSOP) 705-0014. This proposed Title V Major Source Operating Permit is issued under the provisions of ADEM Admin. Code R. 335-3-16. The above-named applicant has requested authorization to perform the work or operate the facility shown on the application and drawings, plans, and other documents attached hereto or on file with the Air Division of the Alabama Department of Environmental Management, in accordance with the terms and conditions of this permit.

The facility is located in Stevenson, Alabama (Jackson County), which is currently listed as in attainment or unclassifiable with the National Ambient Air Quality Standards (NAAQS). The facility began operations in 1975. The initial Title V MSOP was issued on December 1, 2003, and this is the fourth renewal. The current MSOP was issued on December 29, 2020, with an effective date of January 1, 2021, and will expire on December 31, 2025. There was an Administrative Modification of the Title V Permit issued on March 8, 2023. The fourth renewal application was received on June 6, 2025.

There are no current or ongoing enforcement actions against WRS necessitating additional requirements to achieve compliance with the proposed permit conditions. The enforcement and compliance history for the facility can be found at https://echo.epa.gov/ (Search using Facility ID 110056119178).

There are a number of reports the Mill is required to submit quarterly, semiannually, annually, and every five years. The following reports are to be submitted quarterly: excess emission reports for all Continuous Emission Monitoring Systems (CEMS) / Continuous Opacity Monitoring Systems (COMS) and for 40 CFR Part 60 Subpart Db. The following reports are to be submitted semiannually: Maximum Achievable Control Technology (MACT) I compliance and monitoring report, MACT II compliance and monitoring report, Boiler MACT compliance and monitoring report, and Title V monitoring report. An annual compliance certification, Mill-wide emissions report, and Ozone Season report for nitrogen oxides (NO_x) are to be submitted annually. The Mill must also submit an annual excess emission report for units that are part of projects that have a reasonable possibility of resulting in a significant emissions increase. In addition to the reports listed, the Mill must perform a number of performance tests every year, every three years, and/or every five years and submit a report following each performance test. Unit specific requirements are further detailed in the following sections.

BACKGROUND:

The Mill is a sodium carbonate semi-chemical (SCSC) pulp and paper manufacturing facility (Industrial Classification Code 2631). The Mill produces pulp, which is converted into corrugating medium for the manufacturing of corrugated boxes. Operations at the Mill include wood storage and processing; SCSC pulping; secondary (or recycled) fiber pulping; a paper mill consisting of

two paper machines, finishing, warehousing, and shipping facilities; wastewater treatment; and a power plant consisting of two power boilers, two wood residue boilers, and a recovery furnace.

The facility is located in Jackson County, which is classified as Class I County with respect to particulate matter (PM) and a Category I County with respect to sulfur dioxide (SO_2). The Mill is a major source with respect to Title V, Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS), and the MACT / New Emission Standards for Hazardous Air Pollutants (NESHAP) standards. The Mill is a major source for filterable PM, total PM less than 10 micrometers (PM_{10}), total PM less than 2.5 micrometers ($PM_{2.5}$), SO_2, NO_x, carbon monoxide (CO), greenhouse gases (CO_{2e}), volatile organic compounds (VOC), total hazardous air pollutants (HAPs), acetaldehyde, hydrochloric acid (HCl), and methanol.

The Mill has not had any PSD projects since the previous renewal. No new Air Permits will be incorporated into the Title V during this fourth renewal.

The Mill went through an Administrative Modification, issued on March 8, 2023, for the Chemical Recovery System (Emission Unit X014).

EMISSIONS UNITS:

WOODYARD

All of the pulp produced at WRS comes from hardwood timber. The facility purchases either whole hardwood logs or chips. Whole logs are debarked and chipped onsite. Purchased chips and chips produced on site are screened before being conveyed to the chip storage piles and then to the pulp mill. Wood residue that is purchased or produced as a by-product of on-site activities is also stored in the woodyard in a separate pile.

Emission Limits and Proposed Periodic Monitoring:
The woodyard is a non-regulated source of fugitive emissions. Therefore, it is not subject to anything other than the general provisos of the Title V MSOP.

UTILITIES

The utilities area consists of the No. 1 and No. 3 Power Boilers and the No. 1 and No. 2 Wood Fired Boilers. The utilities provide steam, power, and process heat for the facility.

No. 1 Power Boiler

The No. 1 Power Boiler is a Gas 1 natural gas-fired boiler that was installed in 1974. The boiler is rated at 223 MMBtu/hr and is permitted to burn No. 2 fuel oil as an emergency fuel source.

Air Permit 705-0014-Z001 was issued on May 24, 2011, establishing PSD synthetic minor limits for SO_2. This Air Permit was incorporated into the Title V issued on October 6, 2010, as part of a Significant Modification. The project associated with the modification was for installing low-NO_x burners that resulted in a decrease in emissions for SO_2, PM, and NO_x, which are regulated pollutants under 40 CFR 60 Subpart Db. The installation of devices designed to reduce air pollutants do not meet the definition of a modification for NSPS according to 40 CFR 60.14. Therefore, the No. 1 Power Boiler did not become subject to 40 CFR 60 Subpart Db. The SO_2

limit was revised as part of the Significant Modification issued on November 19, 2012, to allow the facility to operate the boiler without control equipment by burning very low sulfur fuel oil.

Control Devices:
The No. 1 Power Boiler is not equipped with any control devices. The boiler is equipped with low NO_x burners to control the formation of NO_x, which does not meet the definition of a control device under 40 CFR 64.1.

Emission Limits and Proposed Periodic Monitoring:
The No. 1 Power Boiler is subject to:

- The applicable requirements of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable requirements of ADEM Admin. Rule 335-3-4-.03 (1) for PM.
- The applicable requirements of 40 CFR 63 Subpart DDDDD.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 for PSD synthetic minor limits for SO_2.

The No. 1 Power Boiler has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
PM	$\leq$ 0.13 lb/MMBtu heat input of filterable PM	SIP	Rule 335-3-4-.03 (1)	N/A
SO_2	$\leq$ 0.2% fuel oil sulfur content	PSD Synthetic Minor	MSOP 705-0015	November 19, 2012
Opacity	$\leq$ 20% except for one six-minute period per hour $\leq$ 40%	SIP	Rule 335-3-4-.01	N/A

The No. 1 Power Boiler has the following emission monitoring, recordkeeping, and reporting requirements:

- A PM emissions test shall be performed and a report submitted each year that fuel oil is fired for greater than 48 hours during any calendar year.
- A continuous monitoring system to record the steam production rate in pounds per hour shall be installed, calibrated, maintained, and operated appropriately. Records shall be made and maintained on file available for inspection for at least five years.
- For PM periodic monitoring, if any three-hour block average steam production rate, while burning fuel oil, is greater than 110 percent of its average value set by the required complying periodic test or a complying test approved by the Department, the steam production rate is to be lowered until compliance is successfully demonstrated at the higher rate.
- For SO_2 periodic monitoring, obtain fuel oil certifications of the sulfur content in the fuel oil from every load received by the mill. Records of fuel oil certifications shall be made and maintained on file available for inspection for at least five years.
- For PM and opacity periodic monitoring when the No. 1 Power Boiler is firing fuel oil, once per day (weather permitting), a one-minute visible emissions reading of plume opacity shall be made and recorded (4 readings taken approximately every 15 seconds) by a person trained in, but not necessarily certified by, EPA Reference Method 9. If the opacity (average of the 4 readings) appears to be above 15 percent, immediate action to identify

and correct the cause of the visible emissions is to be taken. After corrective action has been taken, another one-minute observation shall be taken of the stack's opacity. If the opacity observed does not appear to be in excess of 15%, then no further action is needed. If visible emissions still appear to be in excess of 15%, a 6-minute visible emissions reading shall be conducted before the end of the day by a person certified in EPA Reference Method 9 to determine if the opacity is 20% or less. If the observed opacity is 20% or less, no further action is needed. If no Method 9 reading is conducted despite emissions appearing to be in excess of 15% after corrective action has been taken, the source shall be considered out of compliance with the PM and opacity monitoring parameters for that day. If the required Method 9 reading is not taken due to weather conditions, one shall be taken the next day that weather conditions permit. Records of visible emission readings shall be maintained on file available for inspection for a period of five years.

- Pursuant to 40 CFR 63.7510 (g), the facility must conduct an annual tune-up of the boiler as specified in 40 CFR 63.7540(a)(12). Each annual tune-up must be conducted no more than 13 months after the previous tune-up. This source shall submit a compliance report documenting the required tune-ups, as specified in 40 CFR 63.7550(c)(1), at least once a year.
- Records of hours fuel oil fired in this unit shall be made and maintained on file available for inspection for at least five years.
- This source shall maintain the records required under 40 CFR 63.7555(a) concerning initial notifications. Records must be readily available for review according to 63.10(b)(1) for a period of 5 years.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, changed wording of the opacity emission limit to be consistent with provisos for other units.
- Under Applicability, clarified that the No. 1 Power Boiler is subject to a PSD synthetic minor limit for SO_2.
- Under Emission Standards, added Gas 1 Boiler classification from liquid fuel proviso to 40 CFR 63 Subpart DDDDD proviso in Applicability to be consistent with provisos for other units.
- Under Emissions Standards, moved the energy assessment proviso to Emission Monitoring. This proviso was rewritten to clarify the required frequency of tune ups and to remove the energy assessment portion as this was only a one-time requirement.
- Under Compliance and Performance Test Methods and Procedures, removed all references to alternative test methods.
- Under Emission Standards and Recordkeeping and Reporting Requirements, clarified that the steaming rate shall be monitored and reported when burning fuel oil.
- Under Recordkeeping and Reporting Requirements, clarified the reporting requirements for tune-ups.
- Under Recordkeeping and Reporting Requirements, added five year recordkeeping requirements for initial notifications.
- A number of citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.

No. 3 Power Boiler

The No. 3 Power Boiler is a Gas 1 natural gas-fired boiler that was installed in 2013. The boiler is rated at 270 MMBtu/hr and is permitted to burn No. 2 fuel oil as an emergency fuel source. The boiler is equipped with a continuous oxygen trim system that maintains an optimum air to fuel ratio. Air Permit 705-0014-X019 was issued on May 8, 2013, establishing PSD synthetic minor limits for PM, SO_2, NO_x, and CO. This permit was reissued on April 29, 2015, as a PSD permit with an additional limit for the permissible fuels, then incorporated into the Title V issued on November 17, 2015.

Control Devices:

The No. 3 Power Boiler is not equipped with any control devices. The boiler is equipped with low-NO_x burners and a flue gas recirculation (FGR) system to limit the formation of NO_x, which does not meet the definition of a control device under 40 CFR 64.1.

Emission Limits and Proposed Periodic Monitoring:

The No. 3 Power Boiler is subject to:

- The applicable requirements of 40 CFR 60 General Provisions and Subpart Db for PM, SO_2, NO_x, and opacity.
- The applicable requirements of 40 CFR 63 Subpart DDDDD.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 for PSD synthetic minor limits for PM, SO_2, NO_x, and CO.

The No. 3 Power Boiler has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
Filterable PM	Firing natural gas: PM: ≤ 0.50 lb/hr PM10: ≤ 2.00 lb/hr PM2.5: ≤ 2.00 lb/hr Firing No. 2 fuel oil: PM: ≤ 3.71 lb/hr PM10: ≤ 4.26 lb/hr PM2.5: ≤ 2.87 lb/hr	PSD Synthetic Minor	705-0014-X019	May 8, 2013
SO_2	≤ 0.16 lb/hr while firing natural gas ≤ 52.65 lb/hr while firing No. 2 fuel oil	PSD Synthetic Minor	705-0014-X019	May 8, 2013
NO_x	≤ 0.12 lb/MMbtu (30-day rolling average) while firing natural gas ≤ 0.20 lb/MMbtu (3-hour rolling average) while firing No. 2 fuel oil	PSD Synthetic Minor	705-0014-X019	May 8, 2013

Pollutant	Limit	Limit Type	Origin	Original Date
CO	≤ 11.99 lb/hr while firing natural gas ≤ 11.36 lb/hr while firing No. 2 fuel oil	PSD Synthetic Minor	705-0014-X019	May 8, 2013
Opacity	≤ 20% except for one six-minute period per hour ≤ 27%	NSPS	40 CFR 60 Subpart Db	N/A

The No. 3 Power Boiler has the following emission monitoring, recordkeeping, and reporting requirements:

- A PM emissions test shall be performed and a report submitted each year that fuel oil is fired for greater than 48 hours during any calendar year.
- A filterable PM, total PM_{10}, and total $PM_{2.5}$ emissions test while burning natural gas shall be performed and a report submitted at least once every five years.
- A CO emissions test shall be performed and a report submitted at least once every five years.
- A continuous monitoring system to record the fuel heat input and stack oxygen value in percent oxygen shall be installed, calibrated, maintained, and operated appropriately. Records of all three-hour rolling average furnace oxygen values shall be made and maintained on file available for inspection for at least five years.
- A continuous monitoring system to record the steam production rate in pounds per hour shall be installed, calibrated, maintained, and operated appropriately. Records of all three-hour block average steam production rates shall be made and maintained on file available for inspection for at least five years.
- For PM periodic monitoring, when burning fuel oil, if any three-hour block average steam production rate is greater than 110 percent of its average value set by the required complying periodic test or a complying test approved by the Department, the steam production rate is to be lowered until compliance is successfully demonstrated at the higher rate.
- A continuous monitoring system to record the nitrogen dioxide emission rates in pounds per million Btu fuel oil, or natural gas, heat input shall be installed, calibrated, maintained, and operated in accordance with 40 CFR 60.48b. This CEMS shall be subject to the quality control and quality assurance requirements of 40 CFR Chapter 1 Part 60 Appendix F. An excess emissions report must be submitted to the Department each quarter.
- For CO periodic monitoring, if any three-hour block average oxygen value is less than 75 percent of its respective average value recorded at the time of a required periodic test that showed compliance or a test approved by the Department that showed compliance, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours.
- For SO_2 periodic monitoring, obtain fuel oil certifications of sulfur content in the fuel oil from every load received by the mill. Records of the fuel oil certifications shall be made and maintained on file for inspection for at least five years.
- For PM and opacity periodic monitoring when the No. 3 Power Boiler is firing fuel oil, once per day (weather permitting), a one-minute visible emissions reading of plume opacity shall be made and recorded (4 readings taken approximately every 15 seconds) by a person

trained in, but not necessarily certified by, EPA Reference Method 9. If the opacity (average of the 4 readings) appears to be above 15 percent, immediate action to identify and correct the cause of the visible emissions is to be taken. After corrective action has been taken, another one-minute observation shall be taken of the stack's opacity. If the opacity observed does not appear to be in excess of 15%, then no further action is needed. If visible emissions still appear to be in excess of 15%, a 6-minute visible emissions reading shall be conducted before the end of the day by a person certified in EPA Reference Method 9 to determine if the opacity is 20% or less. If the observed opacity is 20% or less, no further action is needed. If no Method 9 reading is conducted despite emissions appearing to be in excess of 15% after corrective action has been taken, the source shall be considered out of compliance with the PM and opacity monitoring parameters for that day. If the required Method 9 reading is not taken due to weather conditions, one shall be taken the next day that weather conditions permit. Records of the visible emissions reading shall be made and maintained on file available for inspection for a period of five years.

- Pursuant to 40 CFR 63.7510 (g), the facility must conduct a tune-up of the boiler as specified in 40 CFR 63.7540(a)(12) every five years. Each five-year tune-up must be conducted no more than 61 months after the previous tune-up. This source shall submit a compliance report documenting the required tune-ups, as specified in 40 CFR 63.7550(c)(1), at least once every five years.
- Records of hours fuel oil fired in this unit shall be made and maintained on file available for inspection for at least five years.
- This source shall maintain the records required under 40 CFR 63.7555(a) concerning initial notifications. Records must be readily available for review according to 63.10(b)(1) for a period of 5 years.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, changed wording of the opacity emission limit to be consistent with other units.
- Under Applicability, clarified that the No. 3 Power Boiler is subject to PSD-synthetic minor limits for PM, SO_2, NO_x, and CO.
- Under Emission Standards, moved reference to Gas 1 Boiler classification from liquid fuel proviso to Subpart DDDDD proviso in Applicability to be consistent with other units and clarified the boiler is equipped with an oxygen trim system.
- Under Emissions Standards, moved the energy assessment proviso to Emission Monitoring. This proviso was rewritten to clarify the required frequency of tune ups and to remove the energy assessment portion as this was only a one-time requirement.
- Under Emissions Standards, added equipment testing as an allowable use for No. 2 Fuel Oil under Proviso 8.
- Under Compliance and Performance Test Methods and Procedures, removed all references to alternative test methods.
- Under Compliance and Performance Test Methods and Procedures, condensed the NO_x compliance methods into a single proviso.
- Under Emission Standards and Recordkeeping and Reporting Requirements, clarified that the steaming rate shall be monitored and reported when burning fuel oil.
- Under Emission Monitoring, added provisos for monitoring steam production to correspond with existing recordkeeping requirements.

- Under Emission Monitoring, added proviso for CO periodic testing. An existing periodic monitoring requirement (Proviso 8) is based on a parametric value that is set during periodic tests, but the permit did not explicitly require a CO test.
- Under Emission Monitoring, added a proviso for PM periodic testing. This unit has PM emission limits for when natural gas is fired, but existing testing and monitoring requirements only applied when fuel oil was fired.
- Under Recordkeeping and Reporting Requirements, clarified the reporting requirements for tune-ups.
- Under Recordkeeping and Reporting Requirements, added five year recordkeeping requirements for notifications.
- A number of citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.

No. 1 Wood Fired Boiler

The No. 1 Wood Fired Boiler is a wood residue boiler that was installed in 1979 and modified in 1985. The boiler is rated at 430 MMBtu/hr and is permitted to burn natural gas, biomass, tire derived fuel (TDF), and creosote-treated railroad ties (CTRT), and No. 2 fuel oil. Air Permit 705-0014-X004 was issued on August 23, 1979, and established a PSD/Best Available Control Technology (BACT) limit for NO_x. This permit was reissued several times: on June 17, 1985, to establish PSD/BACT limits for PM and CO; on April 1, 1996, to establish PSD synthetic minor limits on SO_2 and NO_x related to fuel oil burning; and on July 14, 2006, to establish the permissible fuel types. These permits were incorporated into the Title V issued on December 1, 2003, and modified on September 11, 2006.

Control Devices:

The No. 1 Wood Fired Boiler is equipped with mechanical dust collectors, a wet fixed throat scrubber, and a polishing wet electrostatic precipitator (WESP) to control PM emissions. The No. 1 Wood Fired Boiler itself is considered a control device and is used to control the low volume high concentration (LVHC) and high volume low concentration (HVLC) gases at the Mill.

Emission Limits and Proposed Periodic Monitoring:

The No. 1 Wood Fired Boiler is subject to:

- The applicable requirements of 40 CFR 60 General Provisions and Subpart Db for PM, SO_2, NO_x, and opacity.
- The applicable requirements of 40 CFR 61 General Provisions and Subpart E, for mercury (Hg).
- The applicable requirements of 40 CFR 63 Subpart DDDDD.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 for PSD/BACT limits for PM, SO_2, NO_x, and CO.

The No. 1 Wood Fired Boiler has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
Filterable PM	≤ 0.10 lbs/MMBtu heat input	PSD	705-0014-X004	June 17, 1985

Pollutant	Limit	Limit Type	Origin	Original Date
SO_2	≤ 0.2% fuel oil sulfur content ≤ 2,253,521 gal of fuel oil may be fired in any rolling 12- month period ≤ 40 tons/day of TDF may be fired	PSD Synthetic Minor	705-0014-X004	April 1, 1996
NO_x	≤ 0.7 lbs/MMBtu heat input	PSD	705-0014-X004	August 23, 1979
NO_x	Pursuant to the 40 CFR 60.44b(c), the combined annual capacity factor for natural gas and fuel oil shall be 10% or less where the annual capacity factor is defined as the ratio between the actual heat input to the unit from natural gas and fuel oil during a calendar year and the potential heat input to the unit had it been operated 8,760 hours of the maximum steady state design heat input	NSPS	40 CFR 60 Subpart Db	N/A
		PSD Synthetic Minor	705-0014-X004	April 1, 1996
CO	≤ 0.6 lbs/MMBtu heat input	PSD	705-0014-X004	June 17, 1985
Opacity	≤ 20% except for one six-minute period per hour ≤ 27%	NSPS	40 CFR 60 Subpart Db	N/A
Hg	7.05 lbs per 24-hour period	NESHAP	40 CFR 61 Subpart E	N/A
Filterable PM	0.44 lb/MMBtu (0.55 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
CO	3,500 ppm by volume on a dry basis corrected to 3% oxygen, or 3.5 lb/MMBtu of steam output (based on 3-run average)	MACT	40 CFR 63 Subpart DDDDD	N/A
HCl	0.020 lb/MMBtu (0.023 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
Hg	5.4E-06 lb/MMBtu (6.2E-06 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A

The No. 1 Wood Waste Boiler has the following emission monitoring, recordkeeping, and reporting requirements:

- A PM emissions test shall be performed and a report submitted at least once per year.
- For PM, SO_2, NO_x, and CO periodic monitoring, if any 30-day rolling average steam production rate is greater than 110 percent of its average value set by the required complying periodic test or a complying test approved by the Department, the steaming rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records of the 30-day rolling average steam production rate shall be made and maintained on file for inspection for at least five years. Emission exceedances and corrective actions shall be recorded as well.
- At all times, except when firing natural gas only, for PM periodic monitoring, if any 30-day rolling average wet scrubber pressure drop, total liquid flow rate to the scrubber, or total inlet secondary electrical power to the WESP is less than the respective lowest 1-hour average value recorded at the time of a required periodic test that showed compliance or a test approved by the Department that showed compliance, the cause is to be investigated and appropriate corrective action is to be taken within 24 hours. Operation below the established minimum operating limits shall constitute a deviation of established operating limits listed in Table 4 of 40 CFR Part 63 Subpart DDDDD except during performance tests conducted to determine compliance with the emission limits or to establish new operating limits. Records of the 30-day rolling average wet scrubber pressure drop, liquid flow rate, and WESP total secondary power shall be made and maintained on file for inspection for at least five years. Emission exceedances and corrective actions shall be recorded as well.
- For SO_2 periodic monitoring, fuel receipts shall be obtained and maintained for at least five years.
- Reports shall be submitted annually certifying that only very low sulfur oil was combusted in the boiler during the reporting period.
- The natural gas and fuel oil heat inputs in million Btus per calendar year shall be monitored. Records shall be made and the annual capacity factor calculated for each calendar year and maintained on file available for inspection for at least five years.
- The heat input of CTRT heat input as a percentage of the total heat input in million Btus per year shall be monitored. Records of CTRT usage shall be made and maintained on file available for inspection for at least five years. Records documenting that CTRT are a listed non-waste under 40 CFR 241.4(a) shall also be made and maintained for inspection.
- A NO_x emissions test shall be performed and a report submitted at least once every five years.
- A CO emissions test shall be performed and a report submitted at least once every five years
- For CO periodic monitoring, if any three-hour block average furnace oxygen value is less than 75 percent of its respective average value recorded at the time of a required periodic test that showed compliance or a test approved by the Department that showed compliance, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours.
- A continuous monitoring system for measuring the tons per day of TDF fed to the boiler shall be installed, calibrated, maintained and operated. Records of TDF fired daily shall be maintained on file available for inspection for at least five years.
- Mercury re-testing is only required if changes are made in the operation that would potentially increase emissions above the level determined by the most recent sludge test.

- In accordance with 40 CFR 63.7525(a), an oxygen analyzer system, as defined in 40 CFR 63.7575, shall be installed, operated, and maintained pursuant to 63.7500(a)(2) and Table 4. The 30-day rolling average oxygen level shall be set no lower than the lowest hourly average oxygen level measured during the most recent CO performance test. A record of the 30-day rolling average oxygen content shall be made and maintained on file available for inspection for at least five years. Emission limit exceedances and any corrective action shall be recorded as well.
- A PM, hydrogen chloride, Hg, and CO performance test shall be performed within 13 months of the previous test. If performance tests for at least 2 consecutive years show that the respective emissions are at or below 75 percent of the emission limit, and if there are no changes in the operation of the boiler or air pollution control equipment that could increase emissions, performance tests may be conducted every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. A Notification of Intent must be submitted at least 60 days before the test is scheduled to begin. Reports must be submitted within 60 days after completion of the test.
- The facility must demonstrate continuous compliance with each applicable emission limit, work practice standard, and operating limit of 40 CFR 63 Subpart DDDDD according to 63.7540(a) and Table 8.
- Pursuant to 40 CFR 63.7510 (g), the facility must conduct an annual tune-up of the boiler as specified in 40 CFR 63.7540(a)(12). Each annual tune-up must be conducted no more than 13 months after the previous tune-up. This source shall submit a semi-annual compliance report documenting the required tune-ups, as specified in 40 CFR 63.7550(c)(1).
- A site-specific monitoring plan shall be developed in accordance with 40 CFR Part 63.7505(d), kept on file, and be readily available for review.
- This source shall maintain all applicable records required under 40 CFR 63.7555. Records must be readily available for review according to 63.10(b)(1) for a period of 5 years.
- This source shall submit all applicable reports required under 40 CFR 63.7550 and Table 9.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, updated the Hg and HCl limits to the new limits under 40 CFR 63 Subpart DDDDD effective as of October 6, 2025.
- On the Information Page and under Emission Standards, changed wording of opacity emission limit to be consistent with other units.
- On the Information Page and under Emission Standards, added CTRT as a permissible fuel type
- Added provisos for emission limits, monitoring, and recordkeeping requirements for CTRT usage.
- Under Emissions Standards, moved the energy assessment proviso to Emission Monitoring. This proviso was rewritten to clarify the required frequency of tune ups and to remove the energy assessment portion as this was only a one-time requirement.
- Under Emission Standards, added provisos for maintaining and operating the boiler according to Boiler MACT.

- Under Compliance and Performance Test Methods and Procedures, removed all references to alternative test methods.
- Under Compliance and Performance Test Methods and Procedures, added references to Subpart DDDDD to PM, CO, Hg, and HCl.
- Under Emission Monitoring, changed the rolling 30-day average steaming rate for PM, NO_x, SO_2, and CO back to three hours and added a separate proviso for 30-day rolling average steaming rate pursuant to the Boiler MACT. The three-hour rolling average is for parametric monitoring of emissions subject to PSD/BACT, which requires data collection on a short-term basis.
- Under Emission Monitoring, updated the Subpart DDDDD performance test provisos by condensing into a single proviso and removing language referring to initial performance tests.
- Under Emission Monitoring, clarified oxygen analyzer system proviso to match boiler MACT requirements.
- Under Emission Monitoring, added MACT proviso for demonstrating continuous compliance.
- Under Recordkeeping and Reporting Requirements, added statement to rolling steam and wet scrubber flow rate provisos for noting exceedances to match language of similar provisos.
- Under Recordkeeping and Reporting Requirements, added MACT provisos for submitting Notification of Intent and performance test results.
- Under Recordkeeping and Reporting Requirements, revised the last two provisos to match language of similar permits.
- A number of citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.
- A number of citations to the general provisos of the applicable Subparts have been removed where unnecessary.

No. 2 Wood Fired Boiler

The No. 2 Wood Fired Boiler is a wood residue boiler that was installed in 1997. The boiler is rated at 620 MMBtu/hr and is permitted to burn natural gas, biomass, TDF, CTRT, and No. 2 fuel oil. Air Permit 705-0014-X015 was issued on January 15, 1997, and established PSD/BACT limits for PM, SO_2, NO_x, CO, VOC, SAM, and opacity. The permit was reissued several times: on January 11, 2000, to establish PSD synthetic minor limits for SO_2 and NO_x related to fuel oil burning; on September 30, 2002, to establish the permissible fuel types; and on July 14, 2006, with revised limits on SO_2 and sulfuric acid mist (SAM). These permits were incorporated into the Title V issued on December 1, 2003, and modified on September 11, 2006.

Control Devices:

The No. 2 Wood Fired Boiler is equipped with a multicyclone and dry electrostatic precipitator to control PM emissions. The No. 2 Wood Fired Boiler itself is considered a control device and is used to control the LVHC and HVLC gases at the Mill.

Emission Limits and Proposed Periodic Monitoring:

The No. 2 Wood Fired Boiler is subject to:

- The applicable requirements of 40 CFR 60 General Provisions and Subpart Db for PM, SO_2, NO_x.
- The applicable requirements of 40 CFR 61 General Provisions and Subpart E for Hg.
- The applicable requirements of 40 CFR 63 Subpart DDDDD.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 for PSD/BACT limits for PM, SO_2, NO_x, CO, VOC, SAM, and opacity.

The No. 2 Wood Fired Boiler has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
Filterable PM	≤ 0.03 lbs/MMBtu and/or ≤ 18.6 lbs/hr	PSD	705-0014-X015	January 15, 1997
SO_2	≤ 93 lbs/hr SO_2 emissions shall not exceed the emission limit in parts per million on a rolling 3-hour average as measured by a CEMS as calculated by the following equation: $E_{ppmdry} = 1/Qs * 9,315,485$ Where: Qs — Stack Gas Flow Rate (Standard Dry Cubic Feet per Minute) from Department Approved Stack Test $E_{ppmdryt}$ — Emission Rate (Parts per Million) Note: This limit may only be re-established with Departmental approval.	PSD	705-0014-X015	July 14, 2006
SO_2	≤ 0.2% fuel oil sulfur content ≤ 2,754,000 gal of fuel oil may be fired in any rolling 12-month period	PSD Synthetic Minor	705-0014-X015	January 11, 2000
NO_x	≤ 0.25 lbs/MMBtu and/or ≤ 155.0 lbs/hr.	PSD	705-0014-X015	January 15, 1997

Pollutant	Limit	Limit Type	Origin	Original Date
NO_x	Pursuant to the Code of Federal Regulations. Section 60.44b(c), the combined annual capacity factor for natural gas and fuel oil shall be 10% or less, where the annual capacity factor is defined as the ratio between the actual heat input to the unit from natural gas and fuel oil during a calendar year and the potential heat input to the unit had it been operated 8,760 hours at the maximum steady state design heat input	NSPS	40 CFR 60 Subpart Db	N/A
		PSD Synthetic Minor	705-0014-X015	January 11, 2000
CO	$\leq$ 0.4 lbs/MMBtu and/or $\leq$ 248.0 lbs/hr	PSD	705-0014-X015	January 15, 1997
VOC	$\leq$ 0.03 lbs/MMBtu and/or $\leq$ 18.6 lbs/hr	PSD	705-0014-X015	January 15, 1997
SAM	$\leq$ 0.022 lbs/MMBtu and/or $\leq$ 13.6 lbs/hr	PSD	705-0014-X015	July 14, 2006
Opacity	$\leq$ 15% (6-min avg)	PSD	705-0014-X015	January 15, 1997
Hg	7.05 lbs/24-hour period	NESHAP	40 CFR 61 Subpart E	N/A
HAPs (Filterable PM as surrogate)	0.44 lb/MMBtu (0.55 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
HAPs (CO as surrogate)	3,500 ppm by volume on a dry basis corrected to 3% oxygen, or 3.5 lb/MMBtu of steam output, (based on a 3-run average)	MACT	40 CFR 63 Subpart DDDDD	N/A
HCl	0.020 lb/MMBtu (0.023 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
Hg	5.4E-06 lb/MMBtu (6.2E-06 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A

The No. 2 Wood Fired Boiler has the following emission monitoring, recordkeeping, and reporting requirements:

- A PM emissions test shall be performed and a report submitted at least once per year.

- A continuous monitoring system to record the opacity discharged from the unit which meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1 shall be installed, operated, calibrated, and maintained.
- For PM and opacity periodic monitoring, if the average of any ten consecutive six-minute opacity averages exceeds 10 percent the cause is to be investigated and appropriate action is to be taken. All six minute averages are to be continuously recorded and maintained for inspection for at least five years.
- For PM monitoring, if any 24-hour block average opacity exceeds 10 percent, the cause is to be investigated and appropriate action is to be taken. Records of all 24-hour block average opacities shall be recorded and maintained for inspection for at least five years. Exceedances and corrective actions shall be recorded. An excess opacity emission report shall be submitted quarterly.
- For PM, NO_x, CO, VOC, and SAM periodic monitoring, if any three-hour block average steam production rate is 110 percent of the average steam production rate set by the required complying periodic test or a complying emission test approved by the Department, the steam production rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records of the three-hour block average steam production rate shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall be recorded.
- A SO_2 CEMS which meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2 shall be installed, operated, calibrated, and maintained. An excess emission report must be submitted quarterly.
- The SO_2 CEMS shall meet the requirements of 40 CFR Part 60, Appendix F. Records of all three-hour rolling average SO_2 emissions shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall be recorded.
- A NO_x emissions test shall be performed and a report submitted at least once every five years.
- The quantity and heat input of fossil fuels fired shall be monitored. A record of the amount of natural gas and fuel oil fired and the annual capacity factor for each calendar year shall be made and maintained on file available for inspection for at least five years.
- The heat input of CTRT heat input as a percentage of the total heat input in million Btus per year shall be monitored. Records of CTRT usage shall be made and maintained on file available for inspection for at least five years. Records documenting that CTRT are a listed non-waste under 40 CFR 241.4(a) shall also be made and maintained for inspection.
- A CO emissions test shall be performed and a report submitted at least once every five years
- A VOC emissions test shall be performed and a report submitted at least once every five years.
- A SAM emissions test shall be performed and a report submitted at least once every five years.
- For CO and VOC periodic monitoring, if any three-hour block average furnace oxygen percentage is less than 75 percent of the average furnace oxygen percentage set by required complying periodic test or a complying CO or VOC emission test approved by the Department, the oxygen percentage is to be raised until compliance is successfully demonstrated at the lower rate. Records for three-hour block average furnace oxygen

percentages shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall be recorded.

- Mercury re-testing is only required if changes are made in the operation that would potentially increase emissions above the level determined by the most recent sludge test.
- In accordance with 40 CFR 63.7525(a), an oxygen analyzer system, as defined in 40 CFR 63.7575, shall be installed, operated, and maintained pursuant to 63.7500(a)(2) and Table 4. The 30-day rolling average oxygen level shall be set no lower than the lowest hourly average oxygen level measured during the most recent CO performance test. Records for 30-day rolling average furnace oxygen percentages shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall be recorded.
- A PM, hydrogen chloride, Hg, and CO performance test shall be performed within 13 months of the previous test. If performance tests for at least 2 consecutive years show that the respective emissions are at or below 75 percent of the emission limit, and if there are no changes in the operation of the boiler or air pollution control equipment that could increase emissions, performance tests may be conducted every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. A Notification of Intent must be submitted at least 60 days before the test is scheduled to begin. Reports must be submitted within 60 days after completion of the test.
- Pursuant to 40 CFR 63.7510 (g), the facility must conduct an annual tune-up of the boiler as specified in 40 CFR 63.7540(a)(12). Each annual tune-up must be conducted no more than 13 months after the previous tune-up. This source shall submit a semiannual compliance report documenting the required tune-ups, as specified in 40 CFR 63.7550(c)(1).
- Pursuant to 40 CFR 63.7500(a)(2) and Table 4, the facility shall maintain the 30-day rolling average operating load such that it does not exceed 110 percent of the highest average operating load recorded during the performance test. Records for three-hour block average steam production rate shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall be recorded.
- The facility must demonstrate continuous compliance with each applicable emission limit, work practice standard, and operating limit of 40 CFR 63 Subpart DDDDD according to 63.7540(a) and Table 8.
- A site-specific monitoring plan shall be developed in accordance with 40 CFR Part 63.7505(d), kept on file, and be readily available for review.
- This source shall maintain all applicable records required under 40 CFR 63.7555. Records must be readily available for review according to 63.10(b)(1) for a period of 5 years.
- This source shall submit all applicable reports required under 40 CFR 63.7550 and Table 9.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, updated the Hg and HCl limits to the new limits under 40 CFR 63 Subpart DDDDD effective as of October 6, 2025.
- On the Information Page and under Emission Standards, changed wording of opacity emission limit to be consistent with other units.

- On the Information Page and under Emission Standards, added CTRT as a permissible fuel type
- Added provisos for emission limits, monitoring, and recordkeeping requirements for CTRT usage.
- Under Applicability, removed redundant proviso for ADEM Admin. Code 335-3-10-.02(1) and (2)(b).
- Under Emissions Standards, moved the energy assessment proviso to Emission Monitoring. This proviso was rewritten to clarify the required frequency of tune ups and to remove the energy assessment portion as this was only a one-time requirement.
- Under Emission Standards, added provisos for maintaining and operating the boiler according to Boiler MACT.
- Under Compliance and Performance Test Methods and Procedures, removed all references to alternative test methods.
- Under Compliance and Performance Test Methods and Procedures, added references to Subpart DDDDD to PM, CO, Hg, and HCl.
- Under Emission Monitoring, updated the Subpart DDDDD performance test provisos by condensing into a single proviso and removing language referring to initial performance tests.
- Under Emission Monitoring, clarified oxygen analyzer system proviso to match boiler MACT requirements.
- Under Emission Monitoring, added MACT proviso for demonstrating continuous compliance.
- Under Recordkeeping and Reporting Requirements, added requirements for noting exceedances to match language of similar provisos.
- Under Recordkeeping and Reporting Requirements, changed wording of continuous opacity recording to match language of similar permits.
- Under Recordkeeping and Reporting Requirements, added MACT provisos for submitting Notification of Intent and performance test results.
- Under Recordkeeping and Reporting Requirements, revised the last two provisos to match language of similar permits.
- A number of citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.
- A number of citations to the general provisos of the applicable Subparts have been removed where unnecessary.

PULP MILL

The pulp mill consists of the No. 1 and 2 Continuous SCSC Digesters, and the No. 1 and No. 2 Brown Stock Washer Systems. The pulp mill makes up the process of converting wood chips into pulp. The non-condensable gases (NCGs) from these units are collected from the pulp mill and incinerated in the No. 1 and No. 2 Wood Fired Boilers.

Nos. 1 and 2 Continuous SCSC Digesters

The continuous digester system consists of two vertical continuous digesters. Wood chips are conveyed to pre-steaming vessels then the digesters where they are softened by soda cooking

liquor to remove the lignin. This creates brown pulp which is sent to the brown stock washing system.

The No. 1 and No. 2 Continuous SCSC Digesters were installed in 1974 and 1997 respectively. They have a combined operating capacity of 1,700 oven dried tons of pulp (ODTP) per day. Air Permit 705-0014-X016 was issued on January 15, 1997, and established PSD/BACT limits for total reduced sulfur (TRS). This permit was incorporated into the Title V issued on December 1, 2003.

Control Devices:
Vent gases from the chip pre-streamers and blow and relief system are collected and combusted in the wood-fired boilers. LVHC gases are required to be treated under 40 CFR 63 Subpart S. The Mill has elected to control these emissions by routing them to the wood-fired boilers for incineration, which is one of the listed control options in 40 CFR 63 Subpart S.

Emission Limits and Proposed Periodic Monitoring:
The digesters are subject to:

- The applicable requirements of 40 CFR 63 Subpart S (MACT I).
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for TRS.

The digesters have the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
TRS	Incineration	PSD	705-0014-X016	January 15, 1997
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

The digesters have the following monitoring, recordkeeping, and reporting requirements:

- For TRS, periodic monitoring shall be performed at least once per day by mill personnel to determine if the gases are being incinerated as required and if the gases are not being incinerated, investigate and take corrective action within twenty-for hours. Records shall be made and maintained on file available for inspection for at least five years.
- See “Provisos for Pulping System Processes” and “Enclosures and Closed-Vent Systems” for additional requirements.

Changes During the Fourth Renewal:

- On the Information Page, corrected the operating capacity to 1,700 ODTP/day for both units according to the information presented in the application.
- Under Recordkeeping and Reporting Requirements, citations to Rule 335-3-14-.02 and Rule 335-3-11-.01 have been corrected to the appropriate regulations.
- Removed various references to ADEM Admin. Code 335-3-11-.06 (1) where unnecessary.

No. 1 Brown Stock Washer System
The No. 1 Brown Stock Washer System consists of three enclosed vacuum drum washers. Pulp from the No. 1 Continuous Digester System blow tank is pumped to the washer to remove spent

cooking liquor. Filtrate is pumped to the Multiple-Effect Evaporator System to begin recovering pulping chemicals. Washed pulp is sent to refiners for fiberizing, through a screw press for thickening, and then to the paper machines. The No. 1 Brown Stock Washer System was installed in 1974. It has a maximum operating capacity of 84,000 dry pounds per hour.

According to 40 CFR 63.443(b), existing affected sources at semi-chemical pulp mills are only required to control the total HAP emission from each LVHC system and new sources are required to control the total HAP emissions from each LVHC system and pulp washing system. As an existing affected source, the No. 1 Brown Stock Washer is exempt from the emission standards of Subpart S.

The permit application states the Mill committed to collecting VOC emissions from this unit in the HVLC methanol-and-air (M&A) system to offset a portion of the emissions of the No. 2 Paper Machine and No. 2 Wood Fired Boiler during a PSD project in 1996. This was a self-imposed limit and not a PSD synthetic minor or PSD/BACT limit. The No. 1 Brown Stock Washer will be incorporated into the Title V during this renewal.

Control Devices:
The Mill has elected to control the emissions of VOCs by collecting them in the HVLC M&A system and routing them to the wood-fired boilers for incineration.

Emission Limits and Proposed Periodic Monitoring:
The No. 1 Brown Stock Washer System is subject to:

- The applicable requirements of ADEM Admin. Rule 335-3-16-.05 for VOC.

The No. 1 Brown Stock Washer has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
VOC	Incineration	Title V	MSOP 705-0014	DRAFT

The brown stock washer system has the following monitoring, recordkeeping, and reporting requirements:

- For VOCs, periodic monitoring shall be performed at least once per day by mill personnel to determine if the gases are being incinerated as required and if the gases are not being incinerated, investigate and take corrective action within twenty-for hours. Records shall be made and maintained on file available for inspection for at least five years.

Changes During the Fourth Renewal:

- The No. 1 Brown Stock Washer Systems has been added to Chapter 9 of the Title V MSOP.
- The VOC emissions limit was included in the Title V Permit during this renewal under ADEM Admin. Code R. 335-3-16-.01(1)(i) and R. 335-3-16-.06(1) and guidance from the EPA found in 57 Federal Register 32250, 32279 (July 21, 1992), which states, “Title V permits are an appropriate means by which a source can assume a voluntary limit on emissions for purposes of avoiding being subject to more stringent requirements.”

No. 2 Brown Stock Washer System

The No. 2 Brown Stock Washer System consists of a single stage Chemi-Washer equipped with a filtrate tank. The brown pulp is pumped from the digesters to remove spent cooking liquor. Filtrate is pumped to the Multiple-Effect Evaporator System to begin recovering pulping chemicals. Washed pulp is sent to refiners for fiberizing, through a screw press for thickening, and then to the paper machines.

The No. 2 Brown Stock Washer System was installed in 1997. It has a maximum operating capacity of 84,000 dry pounds per hour. Air Permit 705-0014-X017 was issued on January 15, 1997, and established a PSD/BACT limit for TRS. This permit was incorporated into the Title V issued on December 1, 2003.

Control Devices:

Gases from the filtrate tank are required to be treated under 40 CFR 63 Subpart S. The Mill has elected to control these emissions by routing them to the wood-fired boilers for incineration, which is one of the listed control options in 40 CFR 63 Subpart S.

Emission Limits and Proposed Periodic Monitoring:

The No. 2 Brown Stock Washer System is subject to:

- The applicable requirements of 40 CFR 63 Subpart S.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for TRS and VOC.

The No. 2 Brown Stock Washer System have the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
TRS	Incineration	PSD	705-0014-X017	January 15, 1997
VOC	Incineration	PSD	705-0014-X017	January 15, 1997
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

The brown stock washer system has the following monitoring, recordkeeping, and reporting requirements:

- For VOC and TRS, periodic monitoring shall be performed at least once per day by mill personnel to determine if the gases are being incinerated as required and if the gases are not being incinerated, investigate and take corrective action within twenty-for hours. Records shall be made and maintained on file available for inspection for at least five years.
- See "Provisos for Pulping System Processes" and "Enclosures and Closed-Vent Systems" for additional requirements.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, added proviso for VOC emission limits. VOC was subject to a PSD review as part of a mill expansion project in 1996. It was determined that collection and incineration of gases containing VOCs in one of the wood-fired boilers satisfied BACT.

- Under Recordkeeping and Reporting Requirements, added requirement to keep a record of whether VOC is being incinerated.
- Under Recordkeeping and Reporting Requirements, citations to Rule 335-3-14-.02 and Rule 335-3-11-.01 have been corrected to the appropriate regulations.
- Removed various references to ADEM Admin. Code 335-3-11-.06 (1) where unnecessary.

PAPER MACHINES

Nos. 1 and 2 Paper Machines

The paper machines convert the dilute slurry of fiber into paper through physical and chemical means. The blended stock from the washers is screened and cleaned before being pumped to the headbox. It is then fed onto the fourdrinier wire for initial formation and to remove and recycle the white water. The stock is then compressed to squeeze out any remaining water and dried. The water is then screened to separate fibers from the water to be reused. The resulting paper sheet is then taken up on a reel and cut to customer specifications. Chemical additives are added at different points in the process based on the desired characteristics in the finished product.

The No. 1 and No. 2 Paper Machines were installed in 1974 and 1995 respectively. They each have an individual operating capacity of 150,000 pounds per hour. Air Permit 705-0014-X010 was issued on January 15, 1997, and established PSD/BACT work practice standard limits for VOC emissions. This permit was incorporated into the Title V issued on December 1, 2003. Air Permit 705-0014-X010 was reissued on April 29, 2015, and established individual PSD/BACT rate based limits for VOC emissions. This permit was incorporated into the Title V issued on November 17, 2015.

Control Devices:

VOC emissions are controlled by the work practice of using only Mill water, non-direct contact condensates, well water, demineralized water, or paper machine white water as sources of process water supply for the paper machine.

Emission Limits and Proposed Periodic Monitoring:

The paper machines are subject to:

- The applicable requirements of an ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT work practice standard limit for VOC.

The paper machines have the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
VOC (No. 1 Paper Machine)	350.58 tpy	PSD	705-0014-X010	April 29, 2015
VOC (No. 2 Paper Machine)	355.40 tpy	PSD	705-0014-X010	April 29, 2015

The paper machines have no additional monitoring, recordkeeping, or reporting requirements other than those listed in the general provisos.

Changes During the Fourth Renewal:

- Under Compliance and Performance Test Methods and Procedures, Emission Monitoring, and Recordkeeping and Reporting Requirements, clarified that the paper machines are not subject to additional requirements other than those listed in the general provisos.
- Several citations to Rule 335-3-14-.02 have been removed.

RECOVERY SYSTEMS

The recovery system consists of the Multiple-Effect Evaporator System and Chemical Recovery System. The recovery system is used to recover chemicals from the pulping process. The recovery furnace in the Chemical Recovery System also generates heat for steam and power generation.

Multiple-Effect Evaporator System

The multiple-effect evaporator system receives weak black liquor from the brown stock washers and evaporates the water to increase the concentration of solids from approximately 9% to approximately 65%. This is done with six evaporator effects, a concentrator, and a surface condenser. The black liquor is then stored in a tank before burning in the chemical recovery system.

The evaporators system was first installed in 1974 and modified in 1998 and 2015. It has an operating capacity of 70,850 pounds of black liquor solids (BLS) per hour, or 1,700,000 pounds BLS per day. Air Permit 705-0014-X018 was issued on January 15, 1997, and established PSD/BACT limits for TRS. This permit was incorporated into the Title V issued on December 1, 2003.

Control Devices:

Gases from the evaporators are required to be treated under 40 CFR 63 Subpart S. The Mill has elected to control these emissions by routing them to the wood-fired boilers for incineration, which is one of the listed control options in 40 CFR 63 Subpart S.

Emission Limits and Proposed Periodic Monitoring:

The evaporator system is subject to:

- The applicable requirements of 40 CFR 63 Subpart S.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for TRS.

The evaporator system has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
TRS	Incineration	PSD	705-0014-X018	January 15, 1997
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

The evaporator system has the following monitoring, recordkeeping, and reporting requirements:

- For TRS, periodic monitoring shall be performed at least once per day by mill personnel to determine if the gases are being incinerated as required and if the gases are not being incinerated, investigate and take corrective action within twenty-for hours. Records shall be made and maintained on file available for inspection for at least five years.

- See “Provisos for Pulping System Processes” and “Enclosures and Closed-Vent Systems” for additional requirements.

Changes During the Fourth Renewal:

- On the Informational Summary page, updated the standard for TRS to ADEM Admin. Code 335-3-14-.04 (9) instead of 335-3-5-.04 since this is a PSD/BACT limit.
- Under Emission Standards, corrected “combination fuel boilers” to “wood-fired boilers.”
- Changed header of Provisos page to match header on Informational Page.
- Several citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.
- Removed various references to ADEM Admin. Code 335-3-11-.06 (1) where unnecessary.

Chemical Recovery System

The chemical recovery system includes a reductive-oxidative recovery furnace, smelt dissolving tank, and chemical conversion system, all operating as a single unit. The recovery furnace burns spent BLS to recover inorganic chemicals. The heat generated from this combustion is used to generate steam. The recovered inorganic material forms a smelt that primarily consists of sodium compounds, including sodium carbonate, sodium bicarbonate, and sodium hydroxide. The smelt flows through water-cooled spouts and mixes with water in the smelt dissolving tank to produce SCSC raw cooking liquor. The raw cooking liquor is clarified and sent to the chemical conversion system.

The chemical recovery system was installed in 1999 and modified / reconstructed in 2001 and 2015. It has an operating capacity of 1,700,000 pounds BLS per day. The recovery furnace is permitted to burn natural gas and low sulfur No. 2 fuel oil as supplemental fuels. Air Permit 705-0014-X014 was issued on January 15, 1997, with PSD/BACT limits for PM, SO_2, NO_x, CO, VOC, TRS, and SAM. It was reissued on November 17, 2015, with revised limits for NO_x, CO, and VOC. A Title V Significant Modification was issued on August 22, 2017, with a revised limit for CO and alternative monitoring criteria for gaseous HAPs.

Control Devices:

The chemical recovery system is equipped with a dry electrostatic precipitator (ESP) followed by a quench water absorber to control PM emissions from the recovery furnace flue gases.

Emission Limits and Proposed Periodic Monitoring:

The chemical recovery system is subject to:

- The applicable requirements of 40 CFR 60 General Provisions and Subpart Db for SO_2 and opacity when No. 2 fuel oil is fired.
- The applicable requirements of 40 CFR 60 General Provisions and Subpart Db for NO_x when No. 2 fuel oil or natural gas is fired.
- The applicable requirements of 40 CFR 63 Subpart MM.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) PSD/BACT limits for PM, SO_2, NO_x, CO, VOC, TRS, and SAM.

The chemical recovery system has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
Filterable PM	≤ 0.036 gr/dscf at 8% O_2 & ≤ 43.8 lbs/hr	PSD	705-0014-X014	January 15, 1997
SO_2	≤ 120 ppm at 8% O_2 (based on a 3-hr rolling average) & ≤ 170.0 lbs/hr	PSD	705-0014-X014	January 15, 1997
SO_2	≤ 0.2% fuel oil sulfur content	NSPS	40 CFR 60 Subpart Db	N/A
NO_x	≤ 120 ppm at 8% O_2 & ≤ 72.92 lbs/hr	PSD	705-0014-X014	November 15, 2015
NO_x	≤ 0.10 lb/MMBtu (30-day rolling average) while firing only natural gas or distillate oil ≤ 0.20 lb/MMBtu (30-day rolling average) while combusting natural gas or distillate oil in combination with BLS	NSPS	40 CFR 60 Subpart Db	N/A
CO	≤ 200.0 ppm at 8% O_2 & ≤ 87.50 lbs/hr	PSD	705-0014-X014	August 22, 2017
VOC	≤ 50 ppm at 8% O_2 (3-hr rolling average) & ≤ 8.87 lbs/hr (as carbon)	PSD	705-0014-X014	November 17, 2015
TRS	≤ 25 ppm at 8% O_2 (12-hr block average) & ≤ 18.8 lbs/hr	PSD	705-0014-X014	January 15, 1997
SAM	≤ 5 ppm at 8% O_2 & ≤ 4.0 lbs/hr	PSD	705-0014-X014	January 15, 1997
Opacity	≤ 20% with one 6-minute period per hour ≤ 27%	NSPS	40 CFR 60 Subpart Db	N/A
Gaseous Organic HAPs	The concentration of gaseous organic HAP, as measured by total hydrocarbons reported as carbon, discharged to the atmosphere shall be < 1.49 kg/Mg (2.97 lb/ton) of BLS fired; or shall be reduced by at least 90% prior to discharge of the gases to the atmosphere. Alternative monitoring parameter is 600.0 ppm CO corrected to 8 percent O_2.	MACT	40 CFR 63 Subpart MM	N/A

The chemical recovery system is subject to the following monitoring, recordkeeping, and reporting requirements:

- A PM emissions test shall be performed and a report submitted at least once per calendar year.
- A TRS emissions test shall be performed and a report submitted at least once every five years.
- A SO_2 emissions test shall be performed and a report submitted at least once every five years.
- A continuous NO_x emission monitoring system to record emission rates in ppm at 8 percent oxygen shall be installed, calibrated, operated, and maintained. This CEMS shall be subject to the quality control and quality assurance requirements of 40 CFR Part 60 Appendix B Specification 2 and Appendix F. An excess emissions report shall be submitted quarterly.
- For PM, CO, VOC, and SAM periodic monitoring, if any three-hour block average BLS firing rate is greater than 110 percent of its average value set by the required complying periodic test or a complying test approved by the Department, the BLS firing rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records of the three-hour block average BLS firing rate shall be made and maintained on file available for inspection for at least five years. Firing rates shall be recorded in terms of tons/day or Mg/day.
- For PM periodic monitoring, if any three-hour block average ESP total power value is less than 90 percent of its 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. Records of the three-hour block average ESP total power values shall be made and maintained on file available for inspection for at least five years.
- The NO_x CEMS shall be audited at least once per calendar quarter. A relative accuracy test audit shall be performed at least once every four calendar quarters. A cylinder gas audit may be performed in three of four calendar quarters but in no more than three quarters in succession.
- A VOC emissions test shall be performed and a report submitted at least once every five years.
- A SAM emissions test shall be performed and a report submitted at least once every five years.
- For CO, VOC, and gaseous HAP periodic monitoring when firing black liquor, a continuous monitoring system to record CO emission rates in parts per million at 8 percent oxygen shall be installed, calibrated, maintained, and operated. If any three-hour rolling average CO emission rate is greater than the permit limit, corrective actions to reduce the CO emission rate shall be taken within 24 hours. An excess emission report shall be submitted quarterly.
- The facility has an approved alternative monitoring parameter to indicate compliance with gaseous organic HAP by not exceeding a CO concentration of 600.0 ppm corrected to 8 percent oxygen. A violation of the gaseous organic HAP standard shall occur when six or more 3-hour average values within any 6-month reporting period are outside this established parameter range. For purposes of determining the number of monitoring exceedances, no more than one exceedance will be attributed during any given 24-hour period.

- Records of the amount of No. 2 Fuel Oil and natural gas fired shall be made and the annual capacity factor calculated for each calendar year and maintained on file available for review for at least five years.
- The owner or operator of each affected source subject to the requirements of Subpart MM shall comply with the recordkeeping requirements of 40 CFR 63.10 of Subpart A, as shown in Table 1 of Subpart MM and the requirements specified in 40 CFR 63.866 and 63.867.
- Records and supporting documentation shall be kept for the compliance determinations, operating ranges, and parameter ranges established for this unit.
- Pursuant to 40 CFR Part 60 Subpart Db, the unit is subject to the reporting and recordkeeping requirements of 40 CFR 60.49b.
- Per the requirements listed in 335-3-14-.04 (17)(e)(3), the facility shall calculate and maintain a record of the unit's annual PM, $PM_{2.5}$, and H_2SO_4 emissions, in tons per year, on a calendar year basis, for a period of 10 years following the resumption of regular operations after the change applied for in the application dated March 2015.
- The facility shall submit a report to the Director within 60 days after the end of each year during which records must be generated under subparagraph ADEM Admin. Code 335-3-14-.04 (17)(e)(3). The report shall contain all the information required by ADEM Admin. Code 335-3-14-.04 (17)(e)(1), the name, address, and telephone number of the source, the annual emissions as calculated pursuant to ADEM Admin. Code 335-3-14-.04 (17)(e)(3) and any other information the owner or operator wishes to furnish.

Changes During the Fourth Renewal:

- On the Information Page and under Emission Standards, changed wording of opacity emission limit to be consistent with other units.
- Removed or replaced references to ADEM Admin. Rule 335-3-4-.01 with ADEM Admin. Rule 335-3-10-.02 (2) for opacity because the standard of 40 CFR 60 Subpart Db is the one being applied and is more stringent.
- On the Information Page and under Emission Standards, citations to Rule 335-3-10-.02 (1) and Rule 335-3-11-.06 (1) have been removed as they were not related to the specific emission standards.
- Under Emission Standards, moved the gaseous HAP alternative monitoring parameter part of Proviso 9 to Emission Monitoring.
- Under Compliance and Performance Test Methods and Procedures, removed all references to alternative test methods.
- Under Compliance and Performance Test Methods and Procedures, condensed the respective SO_2 and TRS provisos into single provisos since the testing methods are the same for both limits.
- Under Emission Monitoring, removed separate proviso for gaseous organic HAP periodic monitoring for being redundant.
- Under Recordkeeping and Reporting Requirements, added a proviso for recordkeeping of ESP total power.
- A number of citations to Rule 335-3-14-.02 have been corrected to the appropriate regulation.
- A number of citations to Rule 335-3-10-.02 (2) and Rule 335-3-14-.04 (9) have been corrected.

- Removed various references to ADEM Admin. Code 335-3-11-.06 (1) where unnecessary.

MACT I SOURCES

Pulping System Processes

Control Devices:
Gases from the digester, brown stock washer, and evaporator systems must be collected and incinerated in the wood-fired boilers. The gases must be conveyed in a closed system that meets the requirements of 40 CFR 63.450 and the requirements included in the "Enclosures and Closed-Vent Systems" section.

Changes During the Fourth Renewal:
- On the Information Page, removed redundant reference to "Evaporators."
- Under Emission Standards, replaced "combination fuel boilers" with "wood-fired boilers."
- Under Emission Standards, removed "(excluding periods of startup, shutdown, or malfunction)" due to change in 40 CFR 63 Subpart S as of September 11, 2012.
- Under Recordkeeping and Reporting Requirements, replaced "Pulp" with "Brown Stock."
- Several citations have been corrected to ADEM Admin. Rule 335-3-11-.06 (18).

Enclosures and Closed-Vent Systems
The Enclosures and Closed-Vent Systems serve to enclose and transport gases from the pulping systems to their corresponding control devices. The system is subject to the requirements found in 40 CFR 63.450.

Emission Limits and Proposed Periodic Monitoring:
The Enclosure and Closed-Vent Systems have the following monitoring, recordkeeping, and reporting requirements
- Each enclosure and closed-vent system used to comply with 40 CFR 63.450(a) shall comply with the requirements specified in bullets (a) through (f) of this section.
    a. For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR 63.450(b) shall be performed at least once per calendar month with at least 21 days between inspections to ensure the opening is maintained in the closed position and sealed.
    b. Each closed-vent system required by 40 CFR 63.450(a) shall be visually inspected at least once per calendar month with at least 21 days between inspections and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
    c. For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR 63.450(c) measured initially and annually by the procedures in 40 CFR 63.457(d).
    d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).
    e. The valve or closure mechanism specified in 40 CFR 63.450(d)(2) shall be inspected at least once each calendar month, with at least 21 days elapsed time between inspections

to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

f. If an inspection required by bullets (a) through (e) of this section identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.
    i. A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
    ii. The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

- Each pulping process condensate closed collection system used to comply with 40 CFR 63.446(d) shall comply with the requirements specified in provisos 2(a) through 2(c) of this section.
    a. Each pulping process condensate closed collection system shall be visually inspected at least once each calendar month, with at least 21 days elapsed time between inspections and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964 of Subpart RR of 40 CFR Part 63, except:
        i. Owners or operators shall comply with the recordkeeping requirements of 40 CFR 63.454 instead of the requirements specified in 40 CFR 63.964(a)(1)(vi) and (b)(3) of Subpart RR of 40 CFR Part 63.
        ii. Owners or operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in provisos (a) and (k) of 40 CFR 63.453 instead of the requirements specified in 40 CFR 63.964(a)(2) of Subpart RR of 40 CFR Part 63.
    b. Each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in 40 CFR 63.446(d)(2)(i) measured initially and annually by the procedures specified in 40 CFR 63.457(d).
        a. If an inspection required by this section identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then corrective actions specified in 40 CFR 63.964(b) of Subpart RR of 40 CFR Part 63 shall be taken.
- The owner or operator of each affected source subject to the requirements of Subpart S shall comply with the recordkeeping requirements of 40 CFR 63.10 of Subpart A, as shown in Table 1 of Subpart S and the requirements specified in Provisos 2 and 3 of this section for the monitoring parameters specified in 40 CFR 63.453.
- For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan.
- The owner or operator shall record the CMS parameters specified in 40 CFR 63.453 and meet the requirements specified in Proviso 1. of this section for any new affected process

equipment that becomes subject to the standards in this subpart due to a process change or modification.

Changes During the Fourth Renewal:

- Several citations were corrected to ADEM Admin. Rule 335-3-11-.06 (18) in order to reference 40 CFR 63 Subpart S.

RICE UNITS

WRS operates two stationary Reciprocating Internal Combustion Engine (RICE) units that provide power for emergency fire pumps. All units are compression ignition engines driven by ultra-low sulfur diesel (ULSD). These units are identified and described by the following:

- MT1020 – Fire Pump Engine; 2006; 292.34 hp
- MT1030 – Fire Pump Engine; 2003; 292.34 hp

Emission Limits and Proposed Periodic Monitoring:

All RICE units are subject to:

- The applicable requirements of ADEM Admin. Rule 335-3-4-.01 (1) for opacity.
- The applicable requirements of 40 CFR 63 Subpart ZZZZ.

All RICE units have the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
Opacity	≤ 20% with one 6-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
HAPs	a. Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first; b. b. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first; c. c. Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.	MACT	40 CFR 63 Subpart ZZZZ	N/A

All RICE units are subject to the following monitoring, recordkeeping, and reporting requirements:

- The facility must install a non-resettable hour meter and monitor all applicable units according to the requirements of 40 CFR 63.6625(f).
- The facility shall monitor and collect data according to the requirements of 40 CFR 63.6635.

- The facility shall keep records of the operation of the applicable engines in emergency and non-emergency service, which is recorded through the non-resettable hour meter. The owner shall record the time of operation of the engine and the reason the engine was in operation during that time. These records shall be retained onsite for inspection purposes for a period of at least five years.
- To demonstrate compliance with the fuel limitations, the permittee shall only purchase fuels subject to meeting the fungible specifications for diesel fuel. Records of these fuel purchases shall be maintained in a permanent form suitable for inspection and shall be readily available for inspection upon request. These records shall be retained for a period of 5 years from the date of generation of each record.
- The facility shall keep records in accordance with 40 CFR 63.6655 for all units.
- If any of the existing units are reconstructed, the facility shall submit an Initial Notification.

Changes During the Fourth Renewal:

- On the Information Page, added model year of RICE units.
- On the Information Page and under Emission Standards, changed wording of opacity emission limit to be consistent with other units.
- On the Information Page, changed "annually" to "within 1 year + 30 days of the previous inspection" pursuant to the change in standard effective August 30, 2024.
- On the Information Page, changed citations to 40 CFR 63 to corresponding ADEM Admin. Rule 335-3-11-.06 (103).
- On the Informational Page, updated the engine time limits to match the requirements of 40 CFR 63.6640(f).
- On the Informational Page and under Emission Standards, moved provisos requiring operation according to 40 CFR 63.6640(f) and according to the manufacturer's instructions to Compliance and Performance Test Methods and Procedures.
- Under Emission Standards, listed the applicable emission standards form 40 CFR 60 Subpart ZZZZ Table 2c(1). These standards were already listed on the Information Page.
- Under Compliance and Performance Test Methods and Procedures, clarified the time limit requirements of 40 CFR 63.6640(f).
- Under Compliance and Performance Test Methods and Procedures, added proviso for determining opacity as required under ADEM Admin. Rule 335-3-4-.01 (2).
- Removed various references to ADEM Admin. Rule 335-3-11-.06 (1) where unnecessary.

SOURCES SUBJECT ONLY TO THE GENERAL PROVISOS

Description	Regulation
Woodyard Fugitives	General Provisos
Emergency Black Liquor Storage Tank	General Provisos
Weak Black Liquor Storage Tank (4 Million Gallons)	General Provisos
Weak Black Liquor Storage Tank (150,000 Gallons)	General Provisos
48% Black Liquor Storage Tank	General Provisos
Blue 48% Black Liquor Storage Tank	General Provisos
Black Liquor Dump Tank	General Provisos
No. 1 High Density Pulp Storage Chest	General Provisos
No. 2 High Density Pulp Storage Chest	General Provisos

No. 3 High Density Pulp Tower	General Provisos
Water Treatment	General Provisos
Wastewater Treatment	General Provisos
Road Dust	General Provisos
System Leaks	General Provisos
Wastepaper Processing	General Provisos

CAM:

Compliance Assurance Monitoring (CAM) applies to pollutant specific emission units that are subject to an emission limitation or standard where a control device is used to achieve compliance with an applicable emission limitation. The CAM rule requires facilities to monitor compliance indicators for emission units to provide reasonable assurance for compliance with regulatory emission limitations. This facility has units that are subject to CAM, as detailed below.

These are the exemptions that apply to one or more emission units operated by the mill:

- The requirements of Part 64 shall not apply to emission limitations or standards proposed by EPA after November 15, 1990, pursuant to section 111 or 112 of the Clean Air Act (40 CFR 64.2(b)(1)(i)).
- The requirements of Part 64 shall not apply to emission limitations or standards for which a Part 70 or 71 permit specifies a continuous compliance determination method (40 CFR 64.2(b)(1)(vi)).

Several units that may be subject to CAM have been determined to be exempt because these units are subject to either an NSPS or MACT standard proposed after November 15, 1990:

- No. 1 Wood Fired Boiler (PM, Hg, HCl) – subject to 40 CFR 63 Subpart DDDDD
- No. 2 Wood Fired Boiler (PM, Hg) – subject to 40 CFR 63 Subpart DDDDD
- Continuous Digester System (HAP) – subject to 40 CFR 63 Subpart S
- No. 2 Brown Stock Washer System (HAP) – subject to 40 CFR 63 Subpart S
- Multiple Effect Evaporator System (HAP) – subject to 40 CFR 63 Subpart S
- RICE Engines – subject to 40 CFR 63 Subpart ZZZZ

Several units that may be subject to CAM have been determined to be exempt because these units are subject to continuous compliance determination as part of a Part 70 permit:

- No. 1 Wood Fired Boiler (SO_2) – obtaining fuel receipts for periodic monitoring
- Continuous Digester System (TRS) – periodic monitoring to ensure gases are being incinerated
- No. 2 Brown Stock Washer System (TRS) – periodic monitoring to ensure gases are being incinerated
- Multiple Effect Evaporator System (TRS) – periodic monitoring to ensure gases are being incinerated

For the chemical recovery system, the Title V Permit currently requires continuous monitoring, which satisfies the CAM rule that requires facilities to monitor compliance indicators for emission units to provide reasonable assurance for compliance with the regulatory emission limitations. A CAM plan was submitted with the application on June 6, 2025:

- Chemical Recovery System (PM) – continuous monitoring of BLS firing rate and ESP total inlet power

FUGITIVE DUST PLAN:

A fugitive dust plan was submitted with the application on June 6, 2025, and will be incorporated into the Title V MSOP during the fourth renewal as Appendix A.

RECOMMENDATIONS:

The renewal Major Source Operating Permit 705-0014 shall be issued with the requirements above pending resolution of any comments received during a 30-day public comment period and a 45-day EPA review.

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Chemical Branch
Air Division
MAB/mab

January 28, 2026
Date

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