

**STATEMENT OF BASIS**  
International Paper – Prattville Mill  
Facility No. 201-0001  
Title V Renewal

**INTRODUCTION**

International Paper – Prattville Mill (IPP, the Mill) has applied for a renewal of its Major Source Operating Permit (MSOP) 201-0001. 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 Prattville, Alabama (Autauga County), which is currently listed as in attainment or unclassifiable with the National Ambient Air Quality Standards (NAAQS). The facility began operations in 1967. The initial Title V MSOP was issued on November 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. A Minor Modification to the Title V permit was issued on May 16, 2022, and a Significant Modification was issued on September 6, 2023. The fourth renewal application was received on June 25, 2025.

There are no current or ongoing enforcement actions against IPP 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 110011734935).

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 emissions report for all Continuous Emission Monitoring Systems (CEMS) / Continuous Opacity Monitoring Systems (COMS) and for 40 CFR Part 60 Subparts Db and BB. The following reports are to be submitted semi-annually: 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 oxide (NO<sub>x</sub>) are to be submitted annually. 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 kraft pulp and paper mill. The Mill produces linerboard from recycled and virgin pulp. Operations at the Mill include wood storage and processing; kraft pulping; a paper mill; chemical recovery; causticizing; a tall oil plant; and a power plant consisting of two power boilers and two recovery furnaces.

The facility is located in Autauga County, which is classified as a Class I County with respect to particulate matter (PM) and a Category II County with respect to sulfur dioxide (SO<sub>2</sub>). 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<sub>10</sub>), total PM less than 2.5 micrometers (PM<sub>2.5</sub>), SO<sub>2</sub>, NO<sub>x</sub>, carbon monoxide (CO), volatile organic compounds (VOC), total reduced sulfur (TRS), greenhouse gases (CO<sub>2e</sub>), total hazardous air pollutants (HAPs), and individual HAPs.

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 a Minor Modification, issued on May 16, 2022, and a Significant Modification, issued on September 6, 2023. The following sections were changed as a result of these modifications:

- No. 1 Power Boiler
- No. 2 Power Boiler
- No. 2 Paper Machine
- Sources Subject Only to General Provisos

The Mill submitted an application for a Significant Modification on October 9, 2025, to revise the MACT II bubble limits under 40 CFR 63.862(a)(1)(ii). The following sections will be changed as a result of this request for modification during this fourth renewal:

- No. 1 Lime Kiln
- No. 2 Recovery Furnace

## **EMISSIONS UNITS**

### **WOODYARD**

The pulp produced at IPP comes from pine, hardwood, or a combination of pine and hardwood. The facility purchases either whole logs or chips. Whole logs are debarked and chipped onsite. Purchased chips and chips produced on site are screened and re-chipped to achieve a uniform size prior to further processing.

#### *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. 2 Power Boilers and the coal and petroleum coke (pet coke) systems. The boilers are used to generate steam for power production and process heat. The coal and pet coke systems are used to unload, crush, and store coal for use in the No. 2 Power Boiler and pet coke for use in the No. 2 Lime Kiln.

**No. 1 Power Boiler**

The No. 1 Power Boiler is an existing hybrid suspension grate boiler that was installed in 1967. The boiler is rated at 707 MMBtu/hr when burning natural gas and 470 MMBtu/hr when burning biomass, which includes materials such as wood residue and wood products. The facility is also permitted to burn railroad ties as specified in 40 CFR 241.4(a)(7-10).

Air Permit 201-0001-Z006 was issued on November 15, 1977, establishing a PSD synthetic minor limit for SO<sub>2</sub>. This limit was established due to the expected increase in TRS venting to the boiler for incineration. This limit was revised upon reissue on November 25, 1996.

The permit was reissued on March 2, 1999, establishing a PSD synthetic minor limit for PM. On December 4, 1998, the Mill submitted an application requesting the No. 1 Power Boiler be permitted as “Fuel Burning Equipment” upon installation of a wet electrostatic precipitator (WESP) as a “credit in analysis” for a then upcoming project for the No. 1 Recovery Furnace.. The Department granted this request and changed the applicable rule from Rule 335-3-4-.08 (4) to Rule 335-3-4-.03 (1) contingent on the installation and operation of the WESP.

Air Permit 201-0001-Z006 was incorporated into the Title V issued on November 1, 2003. The SO<sub>2</sub> limit was revised again upon incorporation into this Title V. In a letter dated February 23, 2017, the EPA approved an alternative monitoring plan that permitted the Mill to set operating limits for the WESP flow rate and secondary power but not for the pressure drop. This monitoring plan was incorporated into the Title V issued on December 29, 2020.

*Control Devices*

The No. 1 Power Boiler is equipped with a mechanical multi-cyclone separator and two WESPs to control PM emissions. The No. 1 Power Boiler is itself a control device for low volume high concentration (LVHC) non-condensable gases (NCGs), high volume low concentration (HVLC) NCGs, and condensate stripper system off-gases.

*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 ADEM Admin. Rule 335-3-8-.71 for the NO<sub>x</sub> Budget Program.
- 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 and SO<sub>2</sub>.

The No. 1 Power Boiler has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 0.12 lb/MMBtu	SIP	Rule 335-3-4-.03 (1)	N/A
		PSD Synthetic Minor	201-0001-Z006	March 2, 1999

Pollutant	Limit	Limit Type	Origin	Original Date
SO <sub>2</sub>	≤ 900 lb/hr.	PSD Synthetic Minor	MSOP 201-0001	November 1, 2003
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3- 4-.01 (1)	N/A
Filterable PM (HAPs)	≤ 0.44 lb/MMBtu (0.55 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
CO (HAPs)	≤ 3,500 ppmvd corrected to 3% O <sub>2</sub> , or 3.5 lb/MMBtu of steam output, on a three-hour 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 Mill has elected to demonstrate compliance with the HCl and Hg limits through emissions averaging with the No. 2 Power Boiler.

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 at least once per year.
- SO<sub>2</sub> emissions shall be monitored by fuel sampling and analysis or fuel receipts. Records of sulfur and BTU content of fuels fired shall be made and maintained on file available for inspection for at least five years.
- Since this unit is controlled by a Wet Electrostatic Precipitator, opacity periodic monitoring will be satisfied through PM emission periodic monitoring.
- At all times, except when firing natural gas only, for PM periodic monitoring, if any three-hour rolling average steaming rate is greater than 110 percent of the average value set by a required periodic test that showed compliance or a test approved by the Department that showed compliance, the steam production rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.
- Pursuant to §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 hourly average operating load recorded during the performance test. Operation above the established maximum 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 shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.

- At all times, except when firing natural gas only, for PM periodic monitoring, if any 30-day rolling average WESP total liquid flow rate to the scrubber, or total inlet secondary electrical power to the WESP is less than the respective lowest one-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 shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.
- If the wash flow to the WESP is off, or if any WESP three-hour rolling average total power 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 24 hours. Records of the presence of wash flow to the WESP and the total power values shall be made and maintained on file available for inspection for at least five years. If an emission limit exceedance is indicated, make a note in the records and make a note of the corrective action that was taken.
- 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. A record of the rolling 30-day average oxygen content shall be made and maintained on file available for inspection for at least five years. If an emission limit exceedance is indicated, make a note in the records and make a note of the corrective action that was taken.
- A PM and CO performance test shall be performed annually within 13 months of the previous test. If performance tests for at least two consecutive years show that 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 prior to the test. Results of the test must be submitted within 60 days after completion of the test.
- In accordance with 40 CFR 63 Subpart DDDDD, the facility must conduct monthly fuel analysis for all fuels burned to demonstrate compliance with mercury and hydrogen chloride as stated in §63.7521. Fuel analysis may be completed any time within a calendar month as long as the analysis is separated from the previous analysis by 14 calendar days according to §63.7515. If each of 12 consecutive monthly fuel analysis demonstrates 75 percent or less of the compliance level, the facility may decrease the fuel analysis frequency to quarterly for that fuel. If any quarterly samples exceed 75 percent of the compliance level or the facility begins to burn new fuel, the facility must return to monthly monitoring for that fuel until 12 months of fuel analyses are again less than 75 percent of the compliance level as specified by §63.7515. If sampling is conducted on one day per month, samples should be no less than 14 days apart, but if multiple samples are taken per month, the 14-day restriction does not apply.

- 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.
- The facility must demonstrate ongoing monthly compliance through emission averaging pursuant to §63.7522(f) and §63.7541.  
Any instance the facility fails to comply with the continuous monitoring requirements of §63.7541(a)(1) – (5) is a deviation.
- Pursuant to §63.7515(d) and Table 3, the facility must conduct an annual performance tune-up according to procedures in §63.7540(a)(10). Each annual tune-up must be completed no more than 13 months after the previous tune-up.
- The owners and operators, and, to the extent applicable, the NO<sub>x</sub> authorized account representative of each NO<sub>x</sub> Budget source and each NO<sub>x</sub> Budget unit at the source shall comply with the monitoring and reporting requirements of ADEM Admin. Code R. 335-3-8-72 for any control period during which a NO<sub>x</sub> Budget Unit operates. The facility shall maintain all records found in ADEM Admin Code R. 335-3-8-71(6)(c) for a period of five years following the date the document is created. The facility must submit a monitoring protocol for review and approval by the Department for each NO<sub>x</sub> Budget Unit.
- For each control period in which one or more NO<sub>x</sub> Budget Units at a source are subject to the NO<sub>x</sub> Budget Program, the NO<sub>x</sub> authorized account representative of the source shall submit to the Department by November 30 of that year a compliance certification report for each source covering all such units. The compliance report shall include the information found in ADEM Admin. Code R. 335-3-8-72(2)(a)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.
- Pursuant to §63.7555(e), the facility must retain a copy of the emission averaging implementation plan developed pursuant to §63.7522(g).
- This source shall submit all applicable reports required under 40 CFR §63.7550 and Table 9.
- 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 five years.

#### *Changes During the Fourth Renewal*

- Removed references to the previous Boiler MACT limits for HCl and Hg and the effective date of the new limits as this date has passed and the new limits are in effect.
- On the Information Page, added a separate row for railroad ties under Permitted Fuels. Railroad ties were previously included in the definition of “biomass.” They are categorically exempt materials under 40 CFR 241(a)(7-10).
- Under Applicability, clarified PM as being subject to a PSD synthetic minor limit.
- Under Applicability, corrected the SO<sub>2</sub> limit as being a PSD synthetic minor limit.
- Under Emission Standards, moved the Boiler MACT tune-up proviso to Emission Monitoring.
- Under Emission Monitoring, added proviso to clarify that opacity periodic monitoring will be satisfied through PM monitoring.
- Under Emission Monitoring, added statement about what constitutes a deviation in Proviso 5.

- Under Emission Monitoring and Recordkeeping and Reporting Requirements, added provisos for monitoring and recordkeeping of 30-day rolling average oxygen, wet scrubber liquid flow, and secondary power to the WESP as required by the Boiler MACT.
- Under Emission Monitoring, added missing language regarding multiple samples taken each month to Proviso 10 to match the language of 40 CFR 63.7515(e).
- Under Recordkeeping and Reporting Requirements, added proviso for recordkeeping of the 30-day rolling average operating load.
- A number of citations have been corrected to the appropriate regulations.

***No. 2 Power Boiler***

The No. 2 Power Boiler is an existing hybrid suspension grate boiler that was installed in 1980 and modified in 2016. The boiler is rated at 568 MMBtu/hr when burning natural gas, 630 MMBtu/hr when burning biomass, which includes materials such as wood residue and wood products, and 515 MMBtu/hr when burning coal. The facility is also permitted to burn railroad ties as specified in 40 CFR 241.4(a)(7-10).

Air Permit 201-0001-X008 was issued on November 15, 1977, as part of a PSD project with the conditions that the Mill must meet the NSPS limits specified in 40 CFR 60 Subpart D. Air Permit 201-0001-Z008 was issued on January 4, 1999, establishing PSD/Best Available Control Technology (BACT) limits for PM and NO<sub>x</sub> and a PSD synthetic minor limit for SO<sub>2</sub>. This permit was incorporated into the Title V issued on November 1, 2003. The boiler underwent a physical modification in 2016 to increase the natural gas firing capacity in order to comply with the clean startup requirements and HCl limits of Boiler MACT. This project also resulted in the loss of the ability to burn fuel oil. The project did not meet the criteria of a modification under NSPS as there was no short-term increase in emission rates, nor did it meet the criteria of a reconstruction as the cost of the project was less than 50 percent of the cost of a new boiler. The boiler therefore remained subject to 40 CFR 60 Subpart D. The change in fuel burning capacities, including the removal of used, reclaimed, and fuel oil as a permitted fuel, was incorporated into the Title V issued on December 29, 2020.

*Control Devices*

The No. 2 Power Boiler is equipped a precipitator to control PM emissions. The No. 2 Power Boiler is itself a control device for HVLC NCGs and condensate stripping system off gases.

*Emission Limits and Proposed Periodic Monitoring*

The No. 2 Power Boiler is subject to:

- The applicable requirements of 40 CFR 60 Subpart D for PM, SO<sub>2</sub>, NO<sub>x</sub>, and opacity.
- The applicable requirements of 40 CFR 63 Subpart DDDDD.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for PM, SO<sub>2</sub>, NO<sub>x</sub>, and opacity.

The No. 2 Power Boiler has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 0.10 lb/MMBtu and/or ≤ 61 lb/hr (three-hour average).	NSPS	40 CFR 60 Subpart D	N/A

Pollutant	Limit	Limit Type	Origin	Original Date
		PSD	201-0001-Z008	January 4, 1999
SO <sub>2</sub>	≤ 1.2 lb/MMBtu (solid fossil fuel or solid fossil fuel and wood residue) and/or ≤ 572 lb/hr (three-hour average).	NSPS	40 CFR 60 Subpart D	N/A
		PSD	201-0001-Z008	January 4, 1999
NO <sub>x</sub>	Shall not exceed: a. ≤ 0.20 lb/MMBtu (gaseous fossil fuel only) (three-hour average). b. ≤ 0.30 lb/MMBtu (gaseous fossil fuel and wood residue) (three-hour average) c. ≤ 0.70 lb/MMBtu (solid fossil fuel or solid fossil fuel and wood residue) (three-hour average)	NSPS	40 CFR 60 Subpart D	N/A
NO <sub>x</sub>	≤ 427 lb/hr (three-hour average).	PSD	201-0001-Z008	January 4, 1999
Opacity	≤ 20% except for one six-minute period per hour ≤ 27%	NSPS	40 CFR 60 Subpart D	N/A
		PSD	201-0001-X008	November 15, 1977
Filterable PM (HAPs)	≤ 0.44 lb/MMBtu (0.55 lb/MMBtu of steam output)	MACT	40 CFR 63 Subpart DDDDD	N/A
CO (HAPs)	≤ 3,500 ppmvd corrected to 3% O <sub>2</sub> , or 3.5 lb/MMBtu of steam output, on a three-hour 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 Mill has elected to demonstrate compliance with the HCl and Hg limits through emissions averaging with the No. 1 Power Boiler.

The No. 2 Power 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.
- At all times, except when firing natural gas only, for PM periodic monitoring, if any three-hour rolling average steaming rate is greater than 110 percent of the average value set by a required periodic test that showed compliance or a test approved by the Department that showed compliance, the steam production rate is to be lowered until compliance is

successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.

- Pursuant to §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 hourly average operating load recorded during the performance test. Operation above the established maximum 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 shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.
- A COMS is to be installed, operated, and maintained. If the average of any ten consecutive six-minute opacity averages exceeds 10 percent, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours. A report of excess opacity emissions shall be submitted quarterly.
- The facility shall monitor opacity through the use of a COMS and meet the requirements of §63.7525(c). Records of all six-minute average opacities shall be made and maintained on file available for inspection for at least five years.
- A NO<sub>x</sub> CEMS shall be installed, calibrated, operated, and maintained. All three-hour rolling average NO<sub>x</sub> emission rates shall be recorded and maintained on file, available for inspection for at least five years. A report of excess emissions shall be submitted quarterly.
- SO<sub>2</sub> emissions shall be monitored by fuel sampling and analysis or fuel receipts. Records of sulfur and BTU content of fuels fired shall be made and maintained on file available for inspection for at least five years.
- 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. A record of the rolling 30-day average oxygen content shall be made and maintained on file available for inspection for at least five years. If an emission limit exceedance is indicated, make a note in the records and make a note of the corrective action that was taken.
- In accordance with 40 CFR 63 Subpart DDDDD, the facility must conduct monthly fuel analysis for all fuels burned to demonstrate compliance with mercury and hydrogen chloride as stated in §63.7521. Fuel analysis may be completed any time within a calendar month as long as the analysis is separated from the previous analysis by 14 calendar days according to §63.7515. If each of 12 consecutive monthly fuel analysis demonstrates 75 percent or less of the compliance level, the facility may decrease the fuel analysis frequency to quarterly for that fuel. If any quarterly samples exceed 75 percent of the compliance level or the facility begins to burn new fuel, the facility must return to monthly monitoring for that fuel until 12 months of fuel analyses are again less than 75 percent of the compliance level as specified by §63.7515. If sampling is conducted on one day per month, samples should be no less than 14 days apart, but if multiple samples are taken per month, the 14-day restriction does not apply.
- A PM and CO performance test shall be performed annually within 13 months of the previous test. If performance tests for at least one consecutive years show that 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 prior to the test. Results of the test 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.
- The facility must demonstrate ongoing monthly compliance through emission averaging pursuant to §63.7522(f) and §63.7541. Any instance the facility fails to comply with the continuous monitoring requirements of §63.7541(a)(1) – (5) is a deviation.
- Pursuant to §63.7515(d) and Table 3, the facility must conduct an annual performance tune-up according to procedures in §63.7540(a)(10). Each annual tune-up must be completed no more than 13 months after the previous tune-up.
- The owners and operators, and, to the extent applicable, the NO<sub>x</sub> authorized account representative of each NO<sub>x</sub> Budget source and each NO<sub>x</sub> Budget unit at the source shall comply with the monitoring and reporting requirements of ADEM Admin. Code R. 335-3-8-.72 for any control period during which a NO<sub>x</sub> Budget Unit operates. The facility shall maintain all records found in ADEM Admin Code R. 335-3-8-.71(6)(c) for a period of five years following the date the document is created. The facility must submit a monitoring protocol for review and approval by the Department for each NO<sub>x</sub> Budget Unit.
- For each control period in which one or more NO<sub>x</sub> Budget Units at a source are subject to the NO<sub>x</sub> Budget Program, the NO<sub>x</sub> authorized account representative of the source shall submit to the Department by November 30 of that year a compliance certification report for each source covering all such units. The compliance report shall include the information found in ADEM Admin. Code R. 335-3-8-.72(2)(a)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.
- Pursuant to §63.7555(e), the facility must retain a copy of the emission averaging implementation plan developed pursuant to §63.7522(g).
- This source shall submit all applicable reports required under 40 CFR §63.7550 and Table 9.
- 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 five years.

#### *Changes During the Fourth Renewal*

- Removed references to the previous Boiler MACT limits for HCl and Hg and the effective date of the new limits as this date has passed and the new limits are in effect.
- On the Information Page, added Max % Ash for coal under Permitted Fuels.
- On the Information Page, added a separate row for railroad ties under Permitted Fuels. Railroad ties were previously included in the definition of “biomass.” They are categorically exempt materials under 40 CFR 241(a)(7-10).
- Under Applicability, created separate provisos for PSD limits for PM, SO<sub>2</sub>, NO<sub>x</sub>, and opacity.
- Under Emission Standards, moved the Boiler MACT tune-up proviso to Emission Monitoring.

- Under Emission Monitoring, added statement about what constitutes a deviation in Proviso 3.
- Under Emission Monitoring, added missing language regarding multiple samples taken each month to Proviso 9 to match the language of 40 CFR 63.7515(e).
- Under Recordkeeping and Reporting Requirements, added proviso for recordkeeping of the 30-day rolling average operating load to correspond to an existing monitoring proviso.
- A number of citations have been corrected to the appropriate regulations.

***Coal and Pet Coke Unloading, Crushing, and Storage Systems***

The coal and pet coke systems have respective operating capacities of 33,300 lb/hr and 5.3 ton/hr. Air Permit 201-0001-X019 for the coal system was issued on November 15, 1977, establishing a PSD/BACT limit for opacity, which is satisfied by 40 CFR 60 Subpart Y. This limit was reestablished as part of a permit reissuance on August 28, 1979. Air Permit 201-0001-X020 for the pet coke system was issued on April 10, 1984, as part of a project to allow the No. 2 Lime Kiln to fire pet coke. This permit established an opacity limit that met the standards of 40 CFR 60 Subpart Y. These permits were incorporated into the Title V issued on November 1, 2003. As part of the third renewal of the Title V MSOP 201-0001, this limit was reattributed as a PSD synthetic minor limit since Subpart Y only applies to coal processing. As part of this fourth renewal, this limit will be attributed to the state opacity limit under Rule 335-3-4-.01(1) since the limit was not adopted to avoid PSD review.

***Control Devices***

The pet coke system is equipped with a baghouse, bin vent, and densi-filter to control PM emissions.

***Emission Limits and Proposed Periodic Monitoring***

The coal system is subject to:

- The applicable requirements of 40 CFR 60 Subpart Y for opacity.
- The applicable requirements of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limit for opacity.

The pet coke system is subject to:

- The applicable requirements of ADEM Admin. Rule 335-3-4-.01 (1) for opacity.

The coal and pet coke systems have the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
Opacity (Coal)	≤ 20%	NSPS	40 CFR 60 Subpart Y	N/A
		PSD	201-0001- X019	November 11, 1977
Opacity (Pet Coke)	≤ 20%	SIP	Rule 335-3- 4-.01 (1)	April 10, 1984

The coal and pet coke systems have the following emission monitoring, recordkeeping, and reporting requirements:

- For opacity periodic monitoring if coal is being processed, once per day, (weather permitting) the system is to be checked by a person knowledgeable in the theory of opacity. If the opacity is higher than normal, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours. Records of any instance of higher than normal opacity from coal processing shall be made and maintained on file available for inspection for at least five years.
- For opacity periodic monitoring if coke is being processed, once per day (weather permitting), the system is to be checked by a person knowledgeable in the theory of opacity. If the opacity is higher than normal, the cause is to be investigated and appropriate corrective action is to be taken within twenty-four hours. Records of any instance of higher than normal opacity from coal processing shall be made and maintained on file available for inspection for at least five years.

#### *Changes During the Fourth Renewal*

- Corrected the coal system operating capacity from 33,000 lb/hr to 33,300 lb/hr.
- Under Applicability, removed Proviso 3. The pet coke system is subject to a state opacity limit.
- Corrected a number of citations to the appropriate regulations.

#### **PULP MILL**

The pulp mill consists of continuous digesters and brown stock washers. Chips from the woodyard are continuously conveyed to the chip meter, on to the low-pressure feeder, and then passed to the steaming vessel where they are preheated and pressurized. The chips are mixed with white liquor then enter the continuous cooking process and are exposed to high pressure and temperature as they move through the digesters. The pulp stock then moves into the washers where a combination of vacuums and wash water sprayers are used to remove spent liquor.

#### ***Continuous Digester System***

The continuous digester system is comprised of three Kamyr continuous digesters: K-1, K-2, and K-3. K-1 was installed in 1967 and has an operating capacity of 1,500 air dried tons of pulp (ADTP) per day. K-2 and K-3 were installed in 1980 and modified in 1998-1999, and each have an operating capacity of 1,100 ADTP per day.

#### ***Control Devices***

NCGs from the K-1 and K-2 turpentine condensers and decanters and the K-3 relief vapor condenser are collected in the LVHC gas collection system and incinerated in the No. 1 Power Boiler or No. 2 Lime Kiln, which is one of the listed control options in 40 CFR 63 Subpart S. NCGs from the blow tanks and liquor filters are collected in the HVLC gas collection system and incinerated in the No. 1 or No. 2 Power Boilers, which is one of the listed control options in 40 CFR 63 Subpart S. Foul condensates from the relief vapor condensers and after coolers and the K-1 and K-2 turpentine condensers are collected in a tank and treated in the condensate stripper.

#### ***Emission Limits and Proposed Periodic Monitoring***

The continuous digester system is subject to:

- The applicable State Only requirements of ADEM Admin. Rule 335-3-5-.04 (5) for TRS (K-1 Only).

- The applicable requirements of 40 CFR 60 Subpart BB for TRS (K-2 and K-3 Only).
- The applicable requirements of 40 CFR 63 Subpart S.

The continuous digester system has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
TRS (K-1 Only)	Incineration	SIP	Rule 335-3-5-.04 (5)	N/A
TRS (K-2 and K-3 Only)	Incineration	NSPS	40 CFR 60 Subpart BB	N/A
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

The continuous digester system has the following emission monitoring, recordkeeping, and reporting requirements:

- Total reduced sulfur (TRS) periodic monitoring, at least once per day, mill personnel shall determine if the gases are being incinerated as required, and, if the gases are not being incinerated, investigate and take corrective action within twenty-four hours. Records of whether or not TRS gases are being incinerated shall be made and maintained on file available for inspection for at least five years.
- See “Provisos for Pulping System Processes”, “Process Condensates”, and “Enclosures and Closed-Vent Systems” for additional requirements.

#### *Changes During the Fourth Renewal*

- On the Information Page, updated the Modification/Reconstruction Date based on the most recent date in the permit application.
- Corrected a citation to the appropriate regulation.

#### ***Brown Stock Washers***

The brown stock washer system is comprised of five wash plants. The No. 1 and No. 2 Wash Plants were installed in 1967, and each have an operating capacity of 950 ADTP per day. The No. 3 Wash Plant was installed in 1975 and has an operating capacity of 570 ADTP per day. The No. 4 and No. 5 Wash Plants were installed in 1979 and have respective operating capacities of 950 ADTP per day and 900 ADTP per day.

#### *Control Devices*

NCGs from the washer hoods and foam breakers are collected in the HVLC gas collection system and incinerated in the No. 1 or No. 2 Power Boilers, which is one of the listed control options in 40 CFR 63 Subpart S.

#### *Emission Limits and Proposed Periodic Monitoring*

The brown stock washer system is subject to:

- The applicable requirements of 40 CFR 60 Subpart BB for TRS (No. 4 and No. 5 Only).
- The applicable requirements of 40 CFR 63 Subpart S.

The brown stock washer system has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
TRS (No. 4 and No. 5 Only)	Incineration	NSPS	40 CFR 60 Subpart BB	N/A
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

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

- For the No. 4 and 5 Wash Plants, TRS periodic monitoring, at least once per day, mill personnel shall determine if the gases are being incinerated as required, and, if the gases are not being incinerated, investigate and take corrective action within twenty-four hours. Records of whether or not TRS gases are being incinerated shall be made and maintained on file available for inspection for at least five years.
- See “Provisos for Pulpig System Processes”, “Process Condensates”, and “Enclosures and Closed Vent Systems” for additional requirements.

#### *Changes During the Fourth Renewal*

- There were no changes made during this fourth renewal.

### **PAPER MILL**

The paper mill consists of two paper machines. Both machines are capable of producing various grades, or weights, of linerboard. The No. 2 Paper Machine can also produce corrugating medium. Pulp stock from the brown stock washers is prepared by mixing in various fiber furnishes. The fibers are refined by rubbing against two metal disks. Additional chemicals are added to reduce absorbency. The pulp is then diluted and delivered through the headboxes onto the forming fabric to drain excess water. The remaining water is removed by squeezing the fiber sheets in a press. Steam heated cylinders dry the sheets in the dryer section. The completed sheets are wound into reels.

#### ***No. 1 Paper Machine***

The No. 1 Paper Machine was installed in 1967 and modified in 1999. It has an operating capacity of 2,508 machine dried tons (MDT) per day. Air Permit 201-0001-X022 was issued on January 4, 1999, establishing a PSD/BACT work practice standard for VOCs. This permit was incorporated into the Title V issued on November 1, 2003.

#### *Control Devices*

Emissions of VOC are controlled by the work practice standard of using mill supply water, non-direct contact condensates, clean condensates, well water, demineralized water, or white water as a water source.

#### *Emission Limits and Proposed Periodic Monitoring*

The No. 1 Paper Machine is subject to:

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

The No. 1 Paper Machine has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
VOC	Work Practice Standard. "Clean Water."	PSD	201-0001-X022	January 4, 1999

The No. 1 Paper Machine has no additional monitoring, recordkeeping, or reporting requirements other than those listed in the general provisos.

*Changes During the Fourth Renewal*

- References to ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits have been corrected.

**No. 2 Paper Machine**

The No. 2 Paper Machine was installed in 1980 and modified in 1998-1999 and in 2016, the latter of which did not result in a permit reissuance. It has an operating capacity of 2,671 MDT per day. Air Permit 201-0001-X023 was issued on January 4, 1999, establishing a PSD/BACT work practice standard for VOCs. This permit was incorporated into the Title V issued on November 1, 2003.

*Control Devices*

Emissions of VOC are controlled by the work practice standard of using mill supply water, non-direct contact condensates, clean condensates, well water, demineralized water, or white water as a water source.

*Emission Limits and Proposed Periodic Monitoring*

The No. 2 Paper Machine is subject to:

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

The No. 2 Paper Machine has the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
VOC	Work Practice Standard. "Clean Water."	PSD	201-0001-X022	January 4, 1999

The No. 2 Paper Machine has no additional monitoring, recordkeeping, or reporting requirements other than those listed in the general provisos.

*Changes During the Fourth Renewal*

- On the Information Page, updated the operating capacity from 1,843 MDT/day to 2,671 MDT/day.
- References to ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits have been corrected.

## **RECOVERY SYSTEMS**

The recovery system consists of the evaporator system, the No. 1 and No. 2 Recovery Furnaces, and the No. 1 and No. 2 Smelt Dissolving Tanks. The evaporator system is used to concentrate black liquor from the pulp mill by evaporating the water. This creates a combustible material (black liquor solids, or BLS) that is burned in the recovery furnaces to generate steam. The inorganic compounds form a molten smelt at the bottom of the recovery furnace which flows to the smelt dissolving tanks. The smelt is mixed with a water based weak wash solution to create green liquor. This is delivered to the causticizing system for further processing to create white liquor and recover the pulping chemicals.

### ***Evaporator System***

The evaporator system is comprised of three multi-effect evaporators: E-1, E-2, and E-3. E-1 was installed in 1968 and has an operating capacity of 1,600 gallons per minute. E-2 and E-3 were installed in 1980 and have respective operating capacities of 1,700 gallons per minute and 1,250 gallons per minute. The evaporator system was modified in 1998.

### ***Control Devices***

The last vapors to condense in each evaporator effect is collected and treated in the condensate stripping system. NCGs from the evaporator are collected in the LVHC gas collection system and incinerated in the No. 1 Power Boiler or No. 2 Lime Kiln, 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 standards of 40 CFR 60 Subpart BB for TRS.
- The applicable standards of 40 CFR 63 Subpart S.

The evaporator system has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
TRS	Incineration	NSPS	40 CFR 60 Subpart BB	N/A
HAPs	Incineration	MACT	40 CFR 63 Subpart S	N/A

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

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

### ***Changes During the Fourth Renewal***

- No changes were made during this fourth renewal.

### ***No. 1 Recovery Furnace***

The No. 1 Recovery Furnace was installed in 1967. It has an operating capacity of 132,000 pounds of BLS per hour. The recovery furnace is permitted to burn BLS, as well as used oil as a backup fuel for start-up and in the event of process upsets. The No. 1 Recovery Furnace is subject to a bubble limit under 40 CFR 63.462(a)(1)(ii) with the No. 2 Recovery Furnace, the smelt dissolving tanks, and the lime kilns.

Air Permit 201-0001-Z001 was issued on March 25, 1987, as part of a permit reissuance to implement new state regulations to be promulgated by the EPA in early 1987, specifically ADEM Admin. Rule 335-3-5-.04 (7) for PM. This permit was not part of an independent project or subject to PSD review. As part of this fourth renewal, this limit will be a Major Source limit in addition to a limit under the state regulations.

Air Permit 201-0001-Z001 was incorporated into the Title V issued on November 1, 2003. This Title V established a PSD/BACT limit for TRS. The No. 1 Recovery Furnace was subject to a PSD review as part of a production increase application dated December 19, 2000. It was determined that the existing state limit of 20 ppm was acceptable as BACT.

The Title V permit issued on November 1, 2003, also established an NSPS opacity limit. The recovery furnace was originally subject to the opacity limit under ADEM Admin. Rule 335-3-4-.01 (1). This limit was revised as part of the initial Title V to be subject to ADEM Admin. Rule 335-3-10-.02 (28), such that the opacity limit was the same as the limit in 40 CFR 60 Subpart BB. Since this source was not subject to and did not become Subpart BB, and Chapter 335-3-10 is not a federally enforceable by the EPA, this limit is State Only. The recovery furnace is, however, still subject to a similar federally enforceable opacity limit under MACT II.

### ***Control Devices***

The No. 1 Recovery Furnace is equipped with an ESP to control PM emissions.

### ***Emission Limits and Proposed Periodic Monitoring***

The No. 1 Recovery Furnace is subject to:

- The applicable standards of ADEM Admin. Rule 335-3-4-.07 (5) for PM.
- The applicable State Only standards of ADEM Admin. Rule 335-3-5-.04 (3) for TRS.
- The applicable State Only requirements of Rule 335-3-10-.02 (28) such that the opacity limit is the same as 40 CFR 60 Subpart BB for kraft recovery furnaces.
- The applicable standards of 40 CFR 63 Subpart MM.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 (9) for TRS.
- The applicable standards of ADEM Admin. Rule 335-3-16-.05 for PM.

The No. 1 Recovery Furnace has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 1.11 lb/ADTP and/or ≤ 60 lb/hr	SIP	Rule 335-3-4-.07 (5)	N/A
		Title V	201-0001-Z001	March 25, 1987

Pollutant	Limit	Limit Type	Origin	Original Date
TRS	≤ 20 ppm at 8% O <sub>2</sub> (daily 12-hour basis)	SIP (State Only)	Rule 335-3-5-.04 (3)	N/A
		PSD	MSOP 201-0001	November 1, 2003
Opacity	≤ 35%	SIP (State Only)	Rule 335-3-10-.01 (2) and 10-.02 (28)	November 1, 2003
		Title V MSOP	201-0001	November 1, 2003
Opacity	≤ 35% for 2% or more of operating time when firing spent pulping liquor in any semiannual period	MACT	40 CFR 63 Subpart MM	N/A
PM (HAP)	≤ 0.023 gr/dscf at 8% O <sub>2</sub>	MACT	40 CFR 63 Subpart MM	N/A

The No. 1 Recovery Furnace 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.
- An opacity monitor shall be installed, calibrated, operated, and maintained. Pursuant to 40 CFR Part 63, Subpart MM, the COMs shall meet the provisions of §63.6(h), §63.8, and §63.864 (d)(1) through (d)(4).
- The black liquor firing rate shall be monitored on a three-hour rolling average basis. If any three-hour rolling average liquor 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 liquor firing rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years.
- A CEMS for the measurement of TRS and oxygen shall be installed, operated, and maintained in accordance with 40 CFR §60.284. An excess emissions report shall be submitted quarterly.
- As specified in §63.864(h) and §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 63, Subpart MM.
- A periodic PM performance test shall be performed pursuant to §63.865 every five years. Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.
- In accordance with §63.864(e)(1), the facility must maintain proper operation of the ESP's automatic voltage control (AVC). The facility must maintain records demonstrating compliance with the requirement in §63.864(e)(1) to maintain proper operation of an ESP's AVC.
- Pursuant to §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of

the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).

- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required when the average of ten consecutive six-minute averages result in a measurement greater than 20 percent opacity when spent pulping liquor is fed, and when a violation, per §63.864(k)(2), is noted (when opacity is greater than 35 percent for 2 percent or more of the operating time when spent pulping liquor is fed within any semiannual period).
- In accordance with §63.866(c)(1), the facility must maintain records of the black liquor firing rates in terms of tons/day or MG/day.
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must also maintain records and documentation of supporting calculations made for compliance determinations made under §63.865(a) through (d).
- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
    - (i) The air pollution control system for any process unit is modified or replaced;
    - (ii) Any unit is shut down for more than 60 consecutive days;
    - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed.
    - (iv) The BLS firing rate for any kraft recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.
- Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.
- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.
  - An excess opacity report shall be submitted quarterly (State Only).

#### *Changes During the Fourth Renewal*

- On the Information Page, clarified the non-MACT opacity limit as being state only.
- On the Information Page, added a separate row for the MACT II opacity limit.
- On the Information Page, added the Max % Ash for used oil under Permitted Fuels.
- Under Applicability, clarified the applicability of Major Source and PSD limits for PM, TRS and Opacity.
- Under Applicability, removed proviso for Major Source opacity limit as this is redundant with the State Only proviso.
- Under Compliance and Performance Test Methods and Procedures, removed a reference to “other methods.”
- Under Emission Monitoring, rewrote Proviso 6 to remove outdated statement for initial testing.
- Under Recordkeeping and Reporting Requirements, removed outdated statement for submitting reports electronically via CEDRI.
- A number of citations have been corrected to the appropriate regulations.

#### ***No. 1 Smelt Dissolving Tanks***

The No. 1 Smelt Dissolving Tanks were installed in 1967 and have an operating capacity of 132,000 pounds BLS per hour. This unit is comprised of separate smelt tanks, each of which has a separate release point. The smelt tanks are part of a bubble limit under 40 CFR 63.462(a)(1)(ii) with the recovery furnaces, the No. 2 Smelt Dissolving Tank, and the lime kilns.

#### *Control Devices*

The No. 1 Smelt Dissolving Tanks are each equipped with venturi wet scrubbers to control PM and TRS emissions.

*Emission Limits and Proposed Periodic Monitoring*

The No. 1 Smelt Dissolving Tanks are subject to:

- The applicable standards of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable standards of ADEM Admin. Rule 335-3-4-.07 (2)(b) for PM.
- The applicable State Only standards of ADEM Admin. Rule 335-3-5-.04 (7) for TRS.
- The applicable standards of 40 CFR 63 Subpart MM.

The No. 1 Smelt Dissolving Tanks have the following limits:

Pollutant	Limit	Limit Type	Origin	Original Date
PM	≤ 0.5 lb/ADTP	SIP	Rule 335-3-4-.07 (2)(b)	N/A
TRS	≤ 0.033 lb/TBLS	SIP (State Only)	Rule 335-3-5-.04 (7)	N/A
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
PM (HAPs) (Stack 1)	≤ 0.25 lb/TBLS	MACT	40 CFR 63 Subpart MM	N/A
PM (HAPs) (Stack 2)	≤ 0.25 lb/TBLS	MACT	40 CFR 63 Subpart MM	N/A

The No. 1 Smelt Dissolving Tanks have 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 periodic monitoring, if any three-hour rolling average liquor 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 liquor firing rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.
- The owner or operator must establish operating limits for the scrubber liquid supply flow rate and pressure drop across the scrubber per §63.864(j).
- In accordance with §63.864(e)(10), the facility shall monitor and record the wet scrubber liquid supply flow rate and the pressure drop at least once every successive 15-minute period during times when spent pulping liquor is fed. The parametric monitoring system shall meet the requirements listed in §63.8(c) and §63.864(e)(10)(i) and (ii).  
This unit shall not have six or more three-hour average parameter values within any six-month reporting period that are below the minimum operating limits established in accordance with §63.864(j) during times when spent pulping liquor is fed, with the exception of scrubber differential pressure during periods of startup and shutdown. No more than one exceedance will be attributed in any given 24-hour period.
- Pursuant to §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the

Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).

- Since this unit is controlled by a wet scrubber, opacity periodic monitoring will be satisfied through PM periodic monitoring.
- As specified in §63.864(h) and §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 63, Subpart MM.
- A periodic PM performance test shall be performed pursuant to §63.865 every five years. Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.
- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required (when a three-hour average flow rate or pressure drop is below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown), and when a violation, per §63.864(k)(2), is noted (when six or more three-hour average flow rate or pressure drop values within any six-month reporting period are below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown.).
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must maintain records of parametric monitoring data required in §63.864, including any period when the three-hour average flow rate or pressure drop, during times when lime mud is fed, were inconsistent with the levels established during the initial or subsequent performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and corrective action taken.  
The facility must also maintain records and documentation of supporting calculations for compliance determinations made under §63.865(a) through (d).  
The facility must also maintain records of the monitoring parameter ranges for the pressure drop and scrubber flow rates.
- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
  - (i) The air pollution control system for any process unit is modified or replaced;
  - (ii) Any unit is shut down for more than 60 consecutive days;
  - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed.
  - (iv) The BLS firing rate for any kraft recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.

- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.
- A TRS emissions test shall be performed and a report submitted at least once every five years (State Only).
- For TRS periodic monitoring, if any three-hour rolling average wet scrubber dilute caustic recirculation flow rate 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 shall be made and maintained on file available for inspection for at least five years. Results of the daily analytical tests to assure that a dilute caustic solution is maintained shall be recorded and maintained on file, available for inspection for at least five years (State Only).

#### *Changes During the Fourth Renewal*

- Under Compliance and Performance Test Methods and Procedures, removed references to “other method.”

- Under Emission Monitoring, added proviso for opacity monitoring being satisfied by PM periodic monitoring since this unit is equipped with a wet scrubber.
- Under Emission Monitoring, removed outdated references to initial testing in Proviso 8.
- Under Recordkeeping and Reporting Requirements, removed outdated statement for submitting reports electronically via CEDRI.
- A number of citations were corrected to the appropriate regulations.

***No. 2 Recovery Furnace***

The No. 2 Recovery Furnace was installed in 1980 and has an operating capacity of 159,000 pounds BLS per hour. The recovery furnace is permitted to burn BLS, as well as used oil as a backup fuel for start-up and in the event of process upsets. The No. 2 Recovery Furnace is subject to a bubble limit under 40 CFR 63.462(a)(1)(ii) with the No. 1 Recovery Furnace, the smelt dissolving tanks, and the lime kilns.

Air Permit 201-0001-Z011 was issued on January 19, 1978, establishing a PSD synthetic minor limit for SO<sub>2</sub>. This permit was reissued on January 4, 1999, establishing additional PSD synthetic minor limits for SO<sub>2</sub> and TRS and a PSD/BACT limit for PM. This permit was incorporated into the Title V issued on November 1, 2003.

***Control Devices***

The No. 2 Recovery Boiler has two stacks, each of which is equipped with a dry ESP to control PM emissions.

***Emission Limits and Proposed Periodic Monitoring***

The No. 2 Recovery Boiler is subject to:

- The applicable standards of 40 CFR 60 Subpart BB for PM, TRS, and opacity.
- The applicable standards of 40 CFR 63 Subpart MM.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 for PSD synthetic minor limits for SO<sub>2</sub> and TRS.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for PM.

The No. 2 Recovery Boiler has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 0.044 gr/dscf at 8 % O <sub>2</sub> and/or ≤ 73 lb/hr	NSPS	40 CFR 60 Subpart BB	N/A
		PSD	201-0001-Z011	January 4, 1999
TRS	≤ 5 ppmv at 8% O <sub>2</sub> and/or ≤ 7 lb/hr	NSPS	40 CFR 60 Subpart BB	N/A
		PSD Synthetic Minor	201-0001-Z011	January 4, 1999
SO <sub>2</sub>	≤ 250 ppmv at 8% O <sub>2</sub> and/or ≤ 482 lb/hr (three-hour average)		201-0001-Z011	January 19, 1978

Pollutant	Limit	Limit Type	Origin	Original Date
		PSD Synthetic Minor	201-0001- Z011	January 4, 1999
Opacity	≤ 35 percent	NSPS	40 CFR 60 Subpart BB	N/A
Opacity	≤ 35% for 2% or more of operating time when firing spent pulping liquor in any semiannual period	MACT	40 CFR 63 Subpart MM	N/A
PM (HAPs) (Stack 1)	≤ 0.034 gr/dscf at 8% O <sub>2</sub>	MACT	40 CFR 63 Subpart MM	N/A
PM (HAPs) (Stack 2)	≤ 0.034 gr/dscf at 8% O <sub>2</sub>	MACT	40 CFR 63 Subpart MM	N/A

The No. 2 Recovery 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.
- An opacity monitor shall be installed, calibrated, operated, and maintained. Pursuant to 40 CFR Part 63, Subpart MM, the COMs shall meet the provisions of §63.6(h), §63.8, and §63.864 (d)(1) through (d)(4).
- The black liquor firing rate shall be monitored on a three-hour rolling average basis. If any three-hour rolling average liquor 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 liquor firing rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years.
- A CEMS for the measurement of TRS and oxygen shall be installed, operated, and maintained in accordance with 40 CFR §60.284. Pursuant to §60.284(f), the procedures under §60.13 shall be followed for installation, evaluation, and operation of the TRS CEMS, and it shall be operated in accordance with the applicable procedures under Performance Specifications 1, 3, and 5 of Appendix B of 40 CFR Part 60. TRS emissions shall be calculated and recorded in accordance with §60.284(c). An excess emissions report shall be submitted quarterly.
- A SO<sub>2</sub> emissions test shall be performed and a report submitted at least once every five years.
- As specified in §63.864(h) and §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 63, Subpart MM.
- A periodic PM performance test shall be performed pursuant to §63.865 every five years. Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.

- In accordance with §63.864(e)(1), the facility must maintain proper operation of the ESP's automatic voltage control (AVC). The facility must maintain records demonstrating compliance with the requirement in §63.864(e)(1) to maintain proper operation of an ESP's AVC.
- Pursuant to §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).
- The Administrator will not consider periods of excess emissions reported under §60.284(d)(2) to be indicative of a violation of §60.11(d) provided the Administrator determines that the facility, including air pollution control equipment is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions and if the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed:
  - a. One percent for TRS emissions
  - b. Six percent for average opacities
- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required when the average of ten consecutive six-minute averages result in a measurement greater than 20 percent opacity when spent pulping liquor is fed, and when a violation, per §63.864(k)(2), is noted (when opacity is greater than 35 percent for 2 percent or more of the operating time when spent pulping liquor is fed within any semiannual period).
- In accordance with §63.866(c)(1), the facility must maintain records of the black liquor firing rates in terms of tons/day or MG/day.
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must also maintain records and documentation of supporting calculations made for compliance determinations made under §63.865(a) through (d).
- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
  - (i) The air pollution control system for any process unit is modified or replaced;
  - (ii) Any unit is shut down for more than 60 consecutive days;
  - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed.
  - (iv) The BLS firing rate for any kraft recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.

- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.

#### *Changes During the Fourth Renewal*

- Revised the MACT II bubble limits for Stacks 1 and 2 from 0.024 gr/dscf at 8% O<sub>2</sub> to 0.034 gr/dscf at 8% O<sub>2</sub> based on the application submitted on October 9, 2025.
- On the Information Page, added separate proviso for MACT II opacity limit.
- Under Applicability, clarified the pollutants limited under Subpart BB,
- Under Applicability, added provisos pertaining to the PSD/BACT limits for PM and PSD synthetic minor limits for TRS and SO<sub>2</sub>.
- Under Compliance and Performance Test Methods and Procedures, removed reference to “other method.”
- Under Emission Monitoring, removed outdated references to initial testing in Proviso 8.

- Under Recordkeeping and Reporting Requirements, removed outdated statement for submitting reports electronically via CEDRI.
- A number of citations have been corrected to the appropriate regulations.

***No. 2 Smelt Dissolving Tank***

The No. 2 Smelt Dissolving Tank was installed in 1980 and has an operating capacity of 159,000 pounds BLS per hour. The smelt tank is part of a bubble limit under 40 CFR 63.462(a)(1)(ii) with the recovery furnaces, the No. 1 Smelt Dissolving Tanks, and the lime kilns. Air Permit 201-0001-Z012 was issued on January 4, 1999, establishing PSD/BACT limits for PM and a PSD synthetic minor limit for TRS. This permit was incorporated into the Title V issued on November 1, 2003.

*Control Devices*

The No. 2 Smelt Dissolving Tank is equipped with a venturi rod deck and wet scrubber to control PM and TRS emissions.

*Emission Limits and Proposed Periodic Monitoring*

The No.2 Smelt Dissolving Tank is subject to:

- The applicable standards of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable standards of 40 CFR 60 Subpart BB for PM and TRS.
- The applicable standards of 40 CFR 63 Subpart MM.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 for PSD synthetic minor limits for TRS.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 (9) for PSD/BACT limits for PM.

The No. 2 Smelt Dissolving Tank has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 0.1 g/kg BLS (dry weight) [0.2 lb/TBLS (dry weight)] or ≤ 16 lb/hr	NSPS	40 CFR 60 Subpart BB	N/A
		PSD	201-0001-Z012	January 4, 1999
TRS	≤ 0.033 lb/TBLS or ≤ 2.6 lb/hr	NSPS	40 CFR 60 Subpart BB	N/A
		PSD Synthetic Minor	201-0001-Z012	January 4, 1999
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
PM (HAPs)	≤ 0.19 lbs/TBLS	MACT	40 CFR 63 Subpart MM	N/A

The No. 2 Smelt Dissolving Tank 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 periodic monitoring, if any three-hour rolling average liquor 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 liquor firing rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years. Exceedances and corrective actions shall also be recorded.
- The owner or operator must establish operating limits for the scrubber liquid supply flow rate and scrubber fan amperage per §63.864(j) or approval letter from EPA dated September 24, 2019.
- In accordance with §63.864(e)(10), the facility shall monitor and record the wet scrubber liquid supply flow rate and fan amperage at least once every successive 15-minute period during times when spent pulping liquor is fed. The parametric monitoring system shall meet the requirements listed in §63.8(c) and §63.864(e)(10)(i) and (ii).  
This unit shall not have six or more three-hour average parameter values within any six-month reporting period that are below the minimum operating limits established in accordance with §63.864(j) during times when spent pulping liquor is fed, with the exception of scrubber differential pressure during periods of startup and shutdown.  
No more than one exceedance will be attributed in any given 24-hour period.  
Records of all three-hour rolling average total weak wash flow to the scrubber and rod deck and indication of fan amps shall be made and maintained on file available for inspection for at least five years.
- Pursuant to §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).
- For TRS periodic monitoring, in any three-hour rolling average total weak wash flow to the scrubber and rod deck 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 or if fan amp 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.  
An appropriate analytical test will be performed daily to assure that a weak wash solution is maintained. If the test indicates a loss of weak wash solution, the cause is to be investigated and appropriate corrective action is to be taken.
- Since this unit is controlled by a wet scrubber, opacity periodic monitoring will be satisfied through PM emission periodic monitoring.
- As specified in §63.864(h) and §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 63, Subpart MM.
- A periodic PM performance test shall be performed pursuant to §63.865 every five years.

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

- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required (when a three-hour average flow rate or fan amperage is below the minimum operating limit established according to §63.864(j) or EPA letter dated September 24, 2019, during time when spent pulping liquor is fed), and when a violation, per §63.864(k)(2), is noted (when six or more three-hour average flow rates or fan amperage values within any six-month period are below the minimum operating limit established according to §63.864(j) during times when spent pulping liquor is fed).
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must maintain records of parametric monitoring data required under §63.864, including any period when the three-hour average flow rate or fan amperage, during times when spent pulping liquor is fed, were inconsistent with the levels established during the initial or subsequent 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 the corrective action taken. The facility must also maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit for each failure to meet an operating limit. The information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

The facility must also maintain records and documentation of supporting calculations for compliance determinations made under §63.865(a) through (d).

The facility must also maintain records of the monitoring parameter ranges for the pressure drop and scrubber flow rates.

- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting

period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
  - (i) The air pollution control system for any process unit is modified or replaced;
  - (ii) Any unit is shut down for more than 60 consecutive days;
  - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed; or
  - (iv) The BLS firing rate for any kraft recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.

- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.

#### *Changes During the Fourth Renewal*

- On the Information Page, clarified that the TRS limit is not State Only.
- Under Applicability, clarified the pollutants regulated under Subpart BB.
- Under Applicability, added separate provisos for the PSD/BACT limit for PM and the PSD synthetic minor limit for TRS.
- Under Compliance and Performance Test Methods and Procedures, removed reference to “other method.”
- Under Emission Monitoring, added proviso for opacity monitoring being satisfied by PM matter periodic monitoring since this unit is equipped with a wet scrubber.
- Under Emission Monitoring, removed outdated references to initial testing in Proviso 9.
- Under Recordkeeping and Reporting Requirements, removed outdated statement for submitting reports electronically via CEDRI.
- A number of citations have been corrected to the appropriate regulations.

### **CAUSTICIZING SYSTEM**

The causticizing system includes the No. 1 and No. 2 Lime Kilns. Green liquor from the smelt dissolving tanks is pumped to the green liquor clarifiers to settle out insoluble impurities. The clarified green liquor is then pumped to the lime slakers and mixed with lime (CaO). The resulting mixture is causticized and filtered to separate the white liquor from the lime mud. The white liquor is stored for use in the pulping process. The lime mud is processed further to separate out the weak liquor for use in the weak wash system of the smelt tanks. The lime mud is then thickened and transferred to the lime kilns leaving reburned lime for reuse.

### **No. 1 Lime Kiln**

The No. 1 Lime Kiln was installed in 1967 and has an operating capacity of 21,242 pounds CaO per hour. The lime kiln is permitted to burn natural gas. The No. 1 Lime Kiln is subject to a bubble limit under 40 CFR 63.462(a)(1)(ii) with the recovery furnaces, the smelt dissolving tanks, and the No. 2 Lime Kiln. This alternative was approved through the provisions of 40 CFR 63.94 as equivalent to the standards of 40 CFR 63 Subpart MM.

### *Control Devices*

The No. 1 Lime Kiln is equipped with a venturi wet scrubber to control PM emissions.

### *Emission Limits and Proposed Periodic Monitoring*

The No. 1 Lime Kiln is subject to:

- The applicable standards of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable standards of ADEM Admin. Rule 335-3-4-.07 (2)(c) for PM.
- The applicable State Only standards of ADEM Admin. Rule 335-3-5-.04 (6) for TRS.
- The applicable standards of 40 CFR 63 Subpart MM.

The No. 1 Lime Kiln has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 1.0 lb/ADTP	SIP	Rule 335-3-4-.07 (2)(c)	N/A
TRS	≤ 20 ppm at 10% O <sub>2</sub>	SIP (State Only)	Rule 335-3-5-.04 (6)	N/A
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
PM (HAPs)	≤ 0.29 gr/dscf at 10% O <sub>2</sub>	MACT	40 CFR 63 Subpart MM	N/A

The No. 1 Lime Kiln 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 periodic monitoring, if any three-hour rolling average lime mud flow rate is greater than 110 percent of its 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 feed rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years.
- Pursuant to §63.866(c)(2), the facility must maintain records of the CaO production rates in units of Mg/d or ton/d.
- Since this unit is controlled by a wet scrubber, opacity periodic monitoring will be satisfied through PM emission periodic monitoring.
- The owner or operator must establish operating limits for the scrubber liquid supply flow rate and pressure drop across the scrubber per §63.864(j).
- In accordance with §63.864(e)(10), the facility shall monitor and record the wet scrubber liquid supply flow rate and pressure drop at least once every successive 15-minute period

during times when lime mud is fed. The parametric monitoring system shall meet the requirements listed in §63.8(c) and §63.864(e)(10)(i) and (ii).

This unit shall not have six or more three-hour average parameter values within any six-month reporting period that are below the minimum operating limits established in accordance with §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown. No more than one exceedance will be attributed in any given 24-hour period. Records shall be made and maintained on file available for inspection for at least five years.

- Per §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).
- As specified in §63.864(h) and §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 63, Subpart MM.
- For compliance with 40 CFR 63 Subpart MM, a PM performance test shall be performed pursuant to §63.865 every five years.  
Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.
- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required (when a three-hour average flow rate or pressure drop is below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown), and when a violation, per §63.864(k)(2), is noted (when six or more three-hour average flow rate or pressure drop values within any six-month reporting period are below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown).
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must maintain records of parametric monitoring data required in §63.864, including any period when the three-hour average flow rate or pressure drop, during times when lime mud is fed, were inconsistent with the levels established during the initial or subsequent performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and corrective action taken.

The facility must also maintain records and documentation of supporting calculations for compliance determinations made under §63.865(a) through (d).

The facility must also maintain records of the monitoring parameter ranges for the pressure drop and scrubber flow rates.

- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
  - (i) The air pollution control system for any process unit is modified or replaced;
  - (ii) Any unit is shut down for more than 60 consecutive days;
  - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed.

Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.

- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.
- A TRS CEMS shall be installed, calibrated, maintained, and operated in accordance with 40 CFR §60.284, except that monitoring spans may be approved by the Director. An excess emissions report shall be submitted quarterly (State Only).

### *Changes During the Fourth Renewal*

- Revised the MACT II bubble limit from 0.36 gr/dscf at 10% O<sub>2</sub> to 0.29 gr/dscf at 10% O<sub>2</sub> based on the application submitted on October 9, 2025.
- Under Compliance and Performance Test Methods and Procedures, removed references to “other methods approved by the Department.”
- Under Emission Monitoring, removed reference to the initial performance test and due date in Proviso 8.
- Under Recordkeeping and Reporting Requirements, removed outdated language from Proviso 8.
- A number of citations have been corrected to the appropriate regulation.

### ***No. 2 Lime Kiln***

The No. 2 Lime Kiln was installed in 1980 and has an operating capacity of 39,829 pounds CaO per hour. The lime kiln is permitted to burn natural gas and pet coke. The No. 2 Lime Kiln is subject to a bubble limit under 40 CFR 63.462(a)(1)(ii) with the recovery furnaces, the smelt dissolving tanks, and the No. 1 Lime Kiln.

Air Permit 201-0001-Y013 was issued on April 10, 1984, establishing a PSD/BACT limit for PM when firing natural gas and pet coke simultaneously. Air Permit 201-0001-Z013 was issued on May 3, 1984, establishing a PSD limit for SO<sub>2</sub>. This permit was reissued on July 1, 1999, establishing additional PSD limits for PM. This permit was incorporated into the Title V issued on November 1, 2003.

### *Control Devices*

The No. 2 Lime Kiln is equipped with a venturi wet scrubber to control PM emissions. The lime kiln is itself a control device LVHC NCGs.

### *Emission Limits and Proposed Periodic Monitoring*

The No. 2 Lime Kiln is subject to:

- The applicable standards of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable standards of 40 CFR 60 Subpart BB for PM and TRS.
- The applicable standards of 40 CFR 63 Subpart MM.
- The applicable standards of ADEM Admin. Rule 335-3-14-.04 (9) for PM and SO<sub>2</sub>.

The No. 2 Lime Kiln has the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
PM	≤ 0.13 gr/dscf at 10% O <sub>2</sub> and/or 42 lb/hr (pet coke only) ≤ 0.066 gr/dscf at 10% O <sub>2</sub> and/or 21 lb/hr (gas only) When petroleum coke and gaseous fossil fuel are fired	NSPS	40 CFR 60 Subpart BB	N/A

Pollutant	Limit	Limit Type	Origin	Original Date
	simultaneously in any combination, the allowed PM emissions rate (in gr/dscf at 10% O <sub>2</sub> ) shall be determined by proration	PSD	201-0001-Y013	April 10, 1984
			201-0001-Z013	July 1, 1999
TRS	≤ 8 ppm at 10% O <sub>2</sub>	NSPS	40 CFR 60 Subpart BB	N/A
SO <sub>2</sub>	≤ 39 tons per year	PSD	201-0001-Z013	May 3, 1984
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
PM (HAPs)	≤ 0.1 gr/dscf at 10% O <sub>2</sub>	MACT	40 CFR 63 Subpart MM	N/A

The No. 2 Lime Kiln 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 periodic monitoring, if any three-hour rolling average lime mud flow rate is greater than 110 percent of its 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 lime mud flow rate is to be lowered until compliance is successfully demonstrated at the higher rate. Records shall be made and maintained on file available for inspection for at least five years.
- Pursuant to §63.866(c)(2), the facility must maintain records of the CaO production rates in units of Mg/d or ton/d.
- For SO<sub>2</sub> periodic monitoring, the facility shall obtain petroleum coke vendor certification of sulfur in fuel for every load received by the mill. Records of fuel usage and sulfur content of fuels, sufficient to calculate SO<sub>2</sub> emissions, shall be made and maintained on file for at least five years.
- A TRS CEMS shall be installed, calibrated, maintained and operated in accordance with 40 CFR §60.284(a)(2), except that monitoring spans may be approved by the Director. Pursuant to §60.284(f), the procedures under §60.13 shall be followed for installation, evaluation, and operation of the TRS CEMS, and it shall be operated in accordance with the applicable procedures under Performance Specifications 1, 3, and 5 of Appendix B of 40 CFR Part 60. An excess emissions report shall be submitted quarterly.
- TRS emissions shall be calculated and recorded in accordance with §60.284(c).
- Since this unit is controlled by a wet scrubber, opacity periodic monitoring will be satisfied through PM emission periodic monitoring.
- The owner or operator must establish operating limits for the scrubber liquid supply flow rate and pressure drop across the scrubber per §63.864(j).
- In accordance with §63.864(e)(10), the facility shall monitor and record the wet scrubber liquid supply flow rate and pressure drop at least once every successive 15-minute period

during times when lime mud is fed. The parametric monitoring system shall meet the requirements listed in §63.8(c) and §63.864(e)(10)(i) and (ii).

This unit shall not have six or more three-hour average parameter values within any six-month reporting period that are below the minimum operating limits established in accordance with §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown. No more than one exceedance will be attributed in any given 24-hour period. Records shall be made and maintained on file available for inspection for at least five years.

- Per §63.864(f), the owner or operator shall keep CMS data quality assurance procedures consistent with the requirements in §63.8(d)(1) and (2) on record for the life of the affected source or until the affected source is no longer subject to the provisions of 40 CFR 63, Subpart MM to be made available for inspection, upon request, by the Administrator. If the performance evaluation plan in §63.8(d)(2) is revised, the owner or operator shall keep the previous versions of the performance evaluation plan on record to be made available for inspection, upon request, by the Administrator, for a period of five years after each revision to the plan. The program of corrective action should be included in the plan required under §63.8(d)(2).
- As specified in §63.864(h) and §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 63, Subpart MM.
- For compliance with 40 CFR 63 Subpart MM, a PM performance test shall be performed pursuant to §63.865 every five years.  
Performance test data must be submitted through CEDRI within 60 days after the date of completing each performance test.
- The Administrator will not consider periods of excess emissions reported under §60.284(d)(2) to be indicative of a violation of §60.11(d) if it is determined that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.
- In accordance with §63.866(b) and §63.864(k)(1), the facility must maintain records of any occurrence when corrective action is required (when a three-hour average flow rate or pressure drop is below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown), and when a violation, per §63.864(k)(2) is noted (when six or more three-hour average flow rate or pressure drop within any six-month reporting period are below the minimum operating limit established according to §63.864(j) during times when lime mud is fed, with the exception of pressure drop during periods of startup and shutdown).
- In accordance with §63.866(c), in addition to the general records required by §63.10(b)(2)(iii) and (vi) through (xiv), the facility must maintain records of parametric monitoring data required in §63.864, including any period when the three-hour average flow rate or pressure drop, during times when lime mud is fed, were inconsistent with the levels established during the initial or subsequent performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and corrective action taken.

The facility must also maintain records and documentation of supporting calculations for compliance determinations made under §63.865(a) through (d).

The facility must also maintain records of the monitoring parameter ranges for the pressure drop and scrubber flow rates.

- In accordance with §63.866(d), in the event this unit fails to meet an emission limit in §63.862 or a CPMS operating limit in §63.864, record the number of failures. For each failure record the date, start time, duration of each failure, and:
  - (i) For any failure to meet an emission limit in §63.862, record an estimate of the quantity of each regulated pollutant emitted over the emission limit and a description of the method used to estimate the emissions.
  - (ii) For each failure to meet an operating limit in §63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted of the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.

Record actions taken to minimize emissions in accordance with §63.860(d) and any corrective actions taken to return the unit to its normal or usual manner of operation.

- In accordance with 40 CFR Part 63, Subpart MM the facility must submit a semiannual Excess Emissions Report and/or Summary Report containing the information required in §63.867(c), including the number and duration of three-hour averages when the flow rate or pressure drops were below the minimum operating limit. If the Total duration of excess emissions or process control system parameter exceedances for the reporting period is less than 1 percent of the total reporting period operating time, and CMS downtime is less than 5 percent of the total reporting period operating time, only the Summary Report is required to be submitted. If the total duration of excess emissions or process control system parameter exceedances for the reporting period is 1 percent or greater of the total reporting period operating time, or the total CMS downtime for the reporting period is 5 percent or greater of the total reporting period operating time, or any violations according to §63.864(k)(2) occurred, information from both the Summary Report and Excess Emissions Report must be submitted.

Excess Emissions and Summary Reports must be reported electronically via CEDRI per §63.867(d)(2).

Reports shall be submitted within 30 days following the end of the semiannual periods ending on June 30 and December 31.

- In accordance with §63.867(b), for any process unit subject to the PM emissions in §63.862(a)(1)(ii), the facility must notify the Administrator before:
  - (i) The air pollution control system for any process unit is modified or replaced;
  - (ii) Any unit is shut down for more than 60 consecutive days;
  - (iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed.

Following actions of (i) or (ii), the facility must recalculate the overall PM emissions limit for the group of process units and resubmit the documentation required in §63.867(b)(2) to the Administrator. All modified PM emissions limits are subject to approval by the Administrator.

- In accordance with §63.867(a), the facility must submit the applicable notifications from Subpart A of this part, as specified in Table 1 of 40 CFR Part 63, Subpart MM.

### *Changes During the Fourth Renewal*

- Under Compliance and Performance Test Methods and Procedures, removed references to “other methods approved by the Department.”
- Under Emission Monitoring, removed reference to the initial performance test and due date in Proviso 11.
- Under Recordkeeping and Reporting Requirements, removed outdated language from Proviso 11.
- A number of citations have been corrected to the appropriate regulation.

## **MACT I SOURCES**

### ***Pulping System Processes***

#### *Control Devices*

LVHC gases from the digesters and evaporators are collected and incinerated in the No. 1 Power Boiler or No. 2 Lime Kiln. HVLC gases from the digesters and washers are collected and incinerated in the No. 1 or No. 2 Power Boiler. The gases must be conveyed in a closed system that meets the requirements of 40 CFR 63.450.

### *Changes During the Fourth Renewal*

- Updated “Proviso 1(b)-(d)” to “Proviso 1(a)-(c)” to correspond to a numbering change in the associated “Enclosures and Closed-Vent Systems” provisos.
- Removed redundant citations.

### ***Process Condensates***

#### *Control Devices*

Process condensates that in total contain a total HAP mass of 3.6 kilograms or more of total HAP per megagram (7.2 pounds per ton) of ODP are collected in a closed collection system that meets the requirements of 40 CFR 63.446 and pumped to the condensate stripping system to reduce or destroy total HAPs. The gases must be conveyed in a closed system that meets the requirements of 40 CFR 63.450.

### *Emission Limits and Proposed Periodic Monitoring*

The Mill is required to collect at least 7.2 pounds of HAPs per oven dried ton of pulp (ODTP) and reduce or destroy the total HAPs by at least 92% or more by weight.

The Process Condensate System has the following monitoring, recordkeeping, and reporting requirements:

- For the pulping process condensates from the equipment systems of this section per the requirements of 40 CFR 63.446, the permittee shall meet the requirements of 40 CFR 63.453.
- A continuous monitoring system (CMS, as defined in 40 CFR Part 63 Subpart A General Provisions 63.2) shall be installed, calibrated, certified, operated, and maintained according to the manufacturer’s specifications. The CMS shall include a continuous recorder.
- In a July 31, 2002, letter, the EPA approved an alternative monitoring request to monitor the “effective steam” of the steam stripper as an alternative monitoring parameter for the individual parameters specified in 40 CFR Part 63 Section §63.453(g)

- A CMS shall be operated to measure the following parameters for each steam stripper used to comply with the treatment requirements in 40 CFR 63.446(e) (3), (4), or (5).
  - a. The process wastewater feed rate;
  - b. The steam feed rate;
  - c. The process wastewater column feed temperature; and
  - d. The effective steam ratio.
- A CMS shall be operated to measure the appropriate parameters determined according to the procedures specified in 40 CFR 63.453(n) to comply with the condensate applicability requirements specified in 40 CFR 63.446(c).
- To establish or reestablish, the value for each operating parameter required to be monitored by this section, each owner or operator shall use the following procedures:
  - a. During the initial performance test required in 40 CFR Part 63.457(a) or any subsequent performance test, continuously record the operating parameter;
  - b. Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;
  - c. The owner or operator shall provide for the Administrator's approval the rationale for selecting the monitoring parameters necessary to comply with this section; and
  - d. Provide for the Administrator's approval the rational for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.
- See Emissions Monitoring Provisos 2 for "Enclosures and Closed-Vent Systems" for details.
- The permittee shall meet the Recordkeeping and Reporting Requirements section of the "Enclosures and Closed-Vent Systems" provisos.

*Changes During the Fourth Renewal*

- Removed a redundant reference.

***Enclosures and Closed-Vent Systems***

The Enclosures and Closed-Vent Systems serve to enclose and transport LVHC and HVLC gases from the pulping systems and process condensates 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 requirements

- Each enclosure and closed-vent system used to comply with 40 CFR 63.450(a) shall comply with the requirements specified in bullets (1) through (6) of this section.
  - (1) 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.
  - (2) 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.

- (3) 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).
  - (4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR 63.457(e).
  - (5) 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.
  - (6) 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 five 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).
    - c. 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.

- Inspection requirements are subject to the April 2, 2002, waiver for inaccessible monitoring points issued by the EPA Region IV.
- 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 or pulping process condensate stream that becomes subject to the standards in this subpart due to a process change or modification.
- The owner or operator must maintain the following records of malfunctions:
  - a. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - b. Records of actions taken during periods of malfunction to minimize emissions in accordance with 63.453(q), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

*Changes During the Fourth Renewal*

- Adjusted the numbering and bulleting of some provisos to be consistent with similar permits.

**RICE UNITS**

IPP operates four stationary Reciprocating Internal Combustion Engine (RICE) units that provide backup electrical and mechanical power during power outages or other emergencies. All four units are compression ignition engines driven by ultra-low sulfur diesel. These units are identified and described by the following:

- LK1 – No. 1 Lime Kiln Auxiliary Drive; October 2012; 46 hp
- LK2 – No. 2 Lime Kiln Auxiliary Drive; April 2015; 46 hp
- FP1 – No. 1 Fire Pump; August 2016; 305 hp
- FP2 – No. 2 Fire Pump; January 2019; 305 hp

*Emission Limits and Proposed Periodic Monitoring*

All RICE units are subject to:

- The applicable requirements of ADEM Admin. Rule 335-3-4-.01 for opacity.
- The applicable requirements of 40 CFR 60 Subpart IIII to meet the requirements of 40 CFR 63 Subpart ZZZZ.

The RICE units have the following limits:

<b>Pollutant</b>	<b>Limit</b>	<b>Limit Type</b>	<b>Origin</b>	<b>Original Date</b>
Opacity	≤ 20% except one six-minute period per hour ≤ 40%	SIP	Rule 335-3-4-.01 (1)	N/A
NMHC + NO <sub>x</sub> , CO, and PM	NMHC+ NO <sub>x</sub> : 7.5 g/kW-hr (5.59 g/hp hr) CO: 5.5 g/kW-hr (4.10 g/hp-hr)	NSPS	40 CFR 60 Subpart IIII	N/A

Pollutant	Limit	Limit Type	Origin	Original Date
(LK1, LK2)	PM: 0.60 g/kW-hr (0.45 g/hp-hr)			
NMHC + NO <sub>x</sub> , CO, and PM (FP1, FP2)	NMHC + NO <sub>x</sub> : 3.0 g/hp-hr CO: 2.6 g/hp-hr PM: 0.15 g/hp-hr	NSPS	40 CFR 60 Subpart IIII	N/A

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

- The facility must install a non-resettable hour meter and monitor FP1 and FP2 according to the requirements of §60.4209 (a) and §60.4211 (f). 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 five years from the date of generation of each record.
- The facility shall keep records in accordance with §60.4214(b) for the FP1 and FP2.

#### *Changes During the Fourth Renewal*

- On the Information Page, added fuel specifications required under Emission Standards Proviso 5.
- On the Information Page, moved the hour limit specification to Compliance and Performance Test Methods and Procedures and rewrote to match the language of the applicable rule.

#### **SOURCES SUBJECT ONLY TO THE GENERAL PROVISOS**

Description	Regulation
Effluent Treatment System	General Provisos
Pulp Storage Tanks	General Provisos
Liquor Storage Tanks	General Provisos
Precoat Filters	General Provisos
Pressure Filters	General Provisos
Tall Oil Plant	General Provisos
Screening and Rechipping Operation Building	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:

- Continuous Digester System (HAPs) – subject to 40 CFR 63 Subpart S
- Brown Stock Washer System (HAPs) – subject to 40 CFR 63 Subpart S
- Evaporator System (HAPs) – subject to 40 CFR 63 Subpart S
- No. 1 Lime Kiln (PM, HAPs) – subject to 40 CFR 63 Subpart MM
- No. 2 Lime Kiln (PM, HAPs) – subject to 40 CFR 63 Subpart MM
- No. 1 Power Boiler (PM, HAPs) – subject to 40 CFR 63 Subpart DDDDD
- No. 2 Power Boiler (PM, HAPs) – subject to 40 CFR 63 subpart DDDDD
- No. 1 Recovery Furnace (PM, HAPs) – subject to 40 CFR 63 Subpart MM
- No. 1 Smelt Dissolving Tank (PM, HAPs) – subject to 40 CFR 63 Subpart MM
- No. 2 Recovery Furnace (PM, HAPs) – subject to 40 CFR 63 Subpart MM
- No. 2 Smelt Dissolving Tank (PM, HAPs) – subject to 40 CFR 63 Subpart MM

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:

- Pet Coke Systems (PM) – periodic monitoring of opacity

### **FUGITIVE DUST PLAN**

A fugitive dust plan was submitted with the application on June 25, 2025, and will be incorporated into the Title V MSOP during the fourth renewal as Appendix A.

## **RECOMMENDATIONS**

The renewal Major Source Operating Permit 201-0001 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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Michael Bragg  
Industrial Chemicals Section  
Chemical Branch  
Air Division  
MAB/spb

February 11, 2026  
Date

FILE ID: 12645 201-0001 001 02-11-2026 TVSOB MAB TV 4TH RENEWAL