Alabama Department of Environmental Management

MAJOR SOURCE OPERATING PERMIT

Permitee:	**INTERNATIONAL PAPER CO.**
Facility Name:	**INTERNATIONAL PAPER RIVERDALE MILL**
Facility No.:	104-0003
Location:	SELMA, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, Ala. Code §§ 22-28-1 to 22-28-23, as amended, the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

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

Issuance Date:	February 15, 2023
Effective Date:	February 15, 2023
Most Recent Modification:	DRAFT
Expiration Date:	February 14, 2028

Process Condensates
Informational Summary

Description: Process Condensates

Emission Unit No: **PC01**

Installation Date: **Reconstruction / Modification date**:

Operating Capacity: 146,200 lb air dried pulp/hr

Operating Schedule: 8760 hours/year

This unit contains equipment that is subject to the following NSPSs, NESHAPs, or MACTs:
40 CFR Part 63 Subpart S

Pollutants Emitted:

Emission Point	Description	Pollutant	Emission Limit	Standard
S446	Process Condensates (1) Each digester system; (2) Each turpentine recovery system; and (3) Each LVHC collection system.	HAPs	Collect the pulping process condensates from equipment systems in this section 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 for mills that do not perform bleaching or 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of ODP for mills that perform bleaching. For the purposes of meeting the collection requirements, a prorated mass standard may be calculated by prorating the applicable mass standards (kilograms of total HAP per megagram of ODP) for bleached and unbleached mills of this section by the ratio of annual megagrams of bleached and unbleached ODP.	Rule 335-3-11-.06 (18)
S446	Process Condensates	HAPs	At mills that do not perform bleaching, treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of ODP. At mills that perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of ODP. For the purposes of meeting the treatment requirements, a prorated mass	Rule 335-3-11-.06 (18)

			standard may be calculated by prorating the applicable mass standards (kilograms of total HAP per megagram of ODP) for bleached and unbleached mills of this section by the ratio of annual megagrams of bleached and unbleached ODP.	
S446	Process Condensates	HAPs	The pulping process condensates from the equipment systems in this section shall be conveyed in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR §63.446	Rule 335-3-11-.06 (18)
S446	Process Condensates	HAPs	The enclosures and closed-vent system shall meet the requirements specified in 40 CFR §63.450	Rule 335-3-11-.06 (18)

Process Condensates
Provisos

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Applicability	
1. This source is subject to the applicable requirements of Rule 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This source is subject to federal National Emission Standards for Hazardous Pollutants General Provisions as provided for in Table 1 of Subpart S and 40 CFR 63, Subpart S.	Rule 335-3-11-.06 (1) and (18)
Emission Standards	
1. For Process Condensates, per the requirements of 40 CFR Part 63, Subpart S, pulping process condensates shall be collected and treated.	Rule 335-3-11-.06 (18)
2. The combined pulping 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 unbleached ODP or 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of bleached ODP shall be controlled as specified in Bullets 3 through 5 of this section. A prorated mass standard will be calculated by prorating the applicable mass standards (pounds of total HAP per ton of ODP) by the ratio of annual tons of bleached and unbleached ODP (with the prorated standard calculated on a rolling 365-day basis).	Rule 335-3-11-.06 (18)
3. The pulping process condensates from the equipment systems in this section shall be conveyed in a closed collection system that is designed and operated to meet the requirements specified in bullets (a) and (b) of this section. a. Each closed collection system shall meet the individual drain system requirements specified in 40 CFR §§63.960, 63.961, and 63.962 of subpart RR of this part, except for closed vent systems and control devices shall be designed and operated in accordance with 40 CFR §63.443(d) and §63.450, instead of in accordance with 40 CFR §63.693 as specified in 40 CFR §63.962 (a)(3)(ii), (b)(3)(ii)(A), and (b)(3)(ii)(B)(5)(iii); and b. If a condensate tank is used in the closed collection system, the tank shall meet the following requirements: (i) The fixed roof and all openings (e.g., access hatches, sampling ports, gauge wells) shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in §63.450 and routed to a control device that meets the requirements in §63.443(d); and (ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.	Rule 335-3-11-.06 (18)
4. Each HAP removed from a pulping process condensate stream during treatment and handling under this section shall be discharged below the liquid surface of a biological treatment system and treated to meet the requirements specified in paragraph (e)(3), (4), or (5) of 40 CFR 63.446 and total HAP shall be measured as specified in 40 CFR §63.457(g).	Rule 335-3-11-.06 (18)

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5. Treat the pulping process condensates to remove 3.3 kilograms or more of total HAP per megagram (6.6 pounds per ton) of unbleached ODP or 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of bleached ODP. A prorated mass standard will be calculated by prorating the applicable mass standards (pounds of total HAP per ton of ODP) by the ratio of annual tons of bleached and unbleached ODP (with the prorated standard calculated on a rolling 365-day basis).	Rule 335-3-11-.06 (18)
Compliance and Performance Test Methods and Procedures	
1. An initial performance test is required by one of the procedures to determine total HAP or methanol in liquid samples described in 40 CFR §63.457.	Rule 335-3-11-.06 (18)
2. For the closed-vent system see the Compliance and Performance Test Methods and Procedures provisos for "Enclosures and Closed-Vent Systems".	Rule 335-3-11-.06 (18)
Emission Monitoring	
1. 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.	Rule 335-3-11-.06 (18)
2. 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.	Rule 335-3-11-.06 (18)
3. A CMS shall be operated to measure the appropriate parameters determined according to the procedures specified in paragraph 5 of this section to comply with the condensate applicability requirements specified in 40 CFR §63.446(c).	Rule 335-3-11-.06 (18)
4. Each owner or operator using an open biological treatment system to comply with 40 CFR §63.446(e)(2) shall perform the daily monitoring procedures specified in either paragraph 4(a) or (b) of this section and shall conduct a performance test each quarter using the procedures specified in paragraph 4(c) of this section. a. Comply with the monitoring and sampling requirements specified in paragraphs (a)(i) and (ii) of this section. i. On a daily basis, monitor the following parameters for each open biological treatment unit: A. Composite daily sample of outlet soluble BOD5 concentration to monitor for maximum daily and maximum monthly average; B. Mixed liquor volatile suspended solids; C. Horsepower of aerator unit(s); D. Inlet liquid flow; and E. Liquid temperature. ii. If the Inlet and Outlet Concentration Measurement Procedure (Procedure 3) in appendix C of 40 CFR Part 63 is used to determine the fraction of HAP compounds degraded in the biological treatment system as specified in 40 CFR §63.457(l), conduct the sampling and archival requirements specified in paragraphs 4(a)(ii)(A) and (B) of this section. A. Obtain daily inlet and outlet liquid grab samples from each biological treatment unit to have HAP data available to perform quarterly performance tests specified in paragraph 4(c) of this section and the compliance tests specified in paragraph 7 of this section. B. Store the samples as specified in 40 CFR §63.457(n) until after the results of the soluble BOD5 test required in paragraph 4(a)(i)(A) of this section are obtained. The storage requirement	Rule 335-3-11-.06 (18)

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is needed since the soluble BOD5 test requires 5 days or more to obtain results. If the results of the soluble BOD5 test are outside of the range established during the initial performance test, then the archive sample shall be used to perform the mass removal or percent reduction determinations. b. As an alternative to the monitoring requirements of paragraph 4(a) of this section, conduct daily monitoring of the site-specific parameters established according to the procedures specified in paragraph 5 of this section. c. Conduct a performance test as specified in 40 CFR §63.457(l) within 45 days after the beginning of each quarter and meet the applicable emission limit in 40 CFR §63.446(e)(2).	
5. To establish or reestablish, the value for each operating parameter required to be monitored by this section or to establish appropriate parameters for paragraph 4(b) of this section, each owner or operator shall use the following procedures: a. During the initial performance test required in 40 CFR §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 paragraph 3 of this section; and d. Provide for the Administrator's approval the rationale 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.	Rule 335-3-11-.06 (18)
6. Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraphs 1 through 5 of this section and established under this subpart. Except as provided in paragraph 7 of this section, 40 CFR §63.443(e), or §63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.	Rule 335-3-11-.06 (18)
7. The procedures of this paragraph apply to each owner or operator of an open biological treatment system complying with paragraph 4 of this section whenever a monitoring parameter excursion occurs, and the owner or operator chooses to conduct a performance test to demonstrate compliance with the applicable emission limit. A monitoring parameter excursion occurs whenever the monitoring parameters specified in paragraphs (a)(i)(A) through (C) of this section or any of the monitoring parameters specified in paragraph (b) of this section are below minimum operating parameter values or above maximum operating parameter values established in paragraph 5 of this section. a. As soon as practical after the beginning of the monitoring parameter excursion, the following requirements shall be met: i. Before the steps in paragraph 7(a)(ii) or (iii) of this section are performed, all sampling and measurements necessary to meet the requirements in paragraph 7(b) of this section shall be conducted. ii. Steps shall be taken to repair or adjust the operation of the process to end the parameter excursion period.	Rule 335-3-11-.06 (18)

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iii. Steps shall be taken to minimize total HAP emissions to the atmosphere during the parameter excursion period. b. A parameter excursion is not a violation of the applicable emission standard if the results of the performance test conducted using the procedures in this paragraph demonstrate compliance with the applicable emission limit in 40 CFR §63.446(e)(2). i. Conduct a performance test as specified in 40 CFR §63.457 using the monitoring data specified in paragraph 4(a) or (b) of this section that coincides with the time of the parameter excursion. No maintenance or changes shall be made to the open biological treatment system after the beginning of a parameter excursion that would influence the results of the performance test. ii. If the results of the performance test specified in paragraph 7(b)(i) of this section demonstrate compliance with the applicable emission limit in 40 CFR §63.446(e)(2), then the parameter excursion is not a violation of the applicable emission limit. iii. If the results of the performance test specified in paragraph 7(b)(i) of this section do not demonstrate compliance with the applicable emission limit in 40 CFR §63.446(e)(2) because the total HAP mass entering the open biological treatment system is below the level needed to demonstrate compliance with the applicable emission limit in 40 CFR §63.446(e)(2), then the owner or operator shall perform the following comparisons: A. If the value of fbio (MeOH) determined during the performance test specified in paragraph 7(b)(i) of this section is within the range of values established during the initial and subsequent performance tests approved by the Administrator, then the parameter excursion is not a violation of the applicable standard. B. If the value of fbio (MeOH) determined during the performance test specified in paragraph 7(2)(i) of this section is not within the range of values established during the initial and subsequent performance tests approved by the Administrator, then the parameter excursion is a violation of the applicable standard. iv. The results of the performance test specified in paragraph 7(b)(i) of this section shall be recorded as specified in 40 CFR §63.454(f). c. If an owner or operator determines that performing the required procedures under paragraph 7(b) of this section for a non-thoroughly mixed open biological system would expose a worker to dangerous, hazardous, or otherwise unsafe conditions, all of the following procedures shall be performed: i. Calculate the mass removal or percent reduction value using the procedures specified in 40 CFR §63.457(l) except the value for fbio (MeOH) shall be determined using the procedures in appendix E to this part. ii. Repeat the procedures in paragraph 7(c)(i) of this section for every day until the unsafe conditions have passed. iii. A parameter excursion is a violation of the standard if the percent reduction or mass removal determined in paragraph 7(c)(i) of this section is less than the percent reduction or mass removal standards specified in 40 CFR §63.446(e)(2), as appropriate, unless the value of fbio (MeOH) determined using the procedures in appendix E of this section, as specified in paragraph 7(c)(i), is within the range of fbio (MeOH) values established during the initial and subsequent performance tests previously approved by the Administrator.	

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iv. The determination that there is a condition that exposes a worker to dangerous, hazardous, or otherwise unsafe conditions shall be documented according to requirements in 40 CFR §63.454(e) and reporting in 40 CFR §63.455(f). v. The requirements of paragraphs 7(a) and (b) of this section shall be performed and met as soon as practical but no later than 24 hours after the conditions have passed that exposed a worker to dangerous, hazardous, or otherwise unsafe conditions.	
Recordkeeping and Reporting Requirements	
1. 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 Recordkeeping and Reporting Requirements section of the "Enclosures and Closed-Vent Systems" provisos.	Rule 335-3-11-.06 (18)
2. For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall meet the Recordkeeping and Reporting Requirements section of the "Enclosures and Closed-Vent Systems provisos".	Rule 335-3-11-.06 (18)
3. The owner or operator shall record and report the CMS parameters specified in 40 CFR §63.453 and meet the requirements specified in the Recordkeeping and Reporting Requirements section of the "Enclosures and Closed-Vent Systems" Proviso Number 1 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.	Rule 335-3-11-.06 (18)
4. The owner or operator of an open non-thoroughly mixed biological treatment system complying with 40 CFR §63.453(p)(3) instead of 40 CFR §63.453(p)(2) shall prepare a written record identifying the specific conditions that would expose a worker to dangerous, hazardous, or otherwise unsafe conditions. The record must include a written explanation of the specific reason(s) why a worker would not be able to perform the sampling and test procedures specified in 40 CFR §63.457(l).	Rule 335-3-11-.06 (18)
5. The owner or operator of an open biological treatment system complying with 40 CFR §63.453(p) shall prepare a written record specifying the results of the performance test specified in 40 CFR §63.453(p)(2).	Rule 335-3-11-.06 (18)
6. If the owner or operator uses the results of the performance test required in 40 CFR §63.453(p)(2) to revise the approved values or ranges of the monitoring parameters specified in 40 CFR §63.453(j)(1) or (2), the owner or operator shall submit an initial notification of the subsequent performance test to the Administrator as soon as practicable, but no later than 15 days, before the performance test required in 40 CFR §63.453(p)(2) is scheduled to be conducted. The owner or operator shall notify the Administrator as soon as practicable, but no later than 24 hours, before the performance test is scheduled to be conducted to confirm the exact date and time of the performance test.	Rule 335-3-11-.06 (18)

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7. To comply with the open biological treatment system monitoring provisions of 40 CFR §63.453(p)(3), the owner or operator shall notify the Administrator as soon as practicable of the onset of the dangerous, hazardous, or otherwise unsafe conditions that did not allow a compliance determination to be conducted using the sampling and test procedures in 40 CFR §63.457(l). The notification shall occur no later than 24 hours after the onset of the dangerous, hazardous, or otherwise unsafe conditions and shall include the specific reason(s) that the sampling and test procedures in 40 CFR §63.457(l) could not be performed.	Rule 335-3-11-.06 (18)