

JOSH STEIN  
Governor

D. REID WILSON  
Secretary

MICHAEL ABRACZINSKAS  
Director



February 5, 2025

Mr. Jason Hoffmann  
Mill Manager  
International Paper – Riegelwood Mill  
865 John L. Riegel Road  
Riegelwood, NC 28456

SUBJECT: Air Quality Permit No. 03138T47  
Facility ID: 2400036  
International Paper – Riegelwood Mill  
Riegelwood  
Columbus County  
Fee Class: Title V  
PSD Class: Major

Dear Mr. Hoffmann:

In accordance with your completed Air Quality Permit Application for a combined PSD major modification and significant modification of your Title V permit, we are forwarding, herewith, Air Quality Permit No. 03138T47 authorizing the construction and operation of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 02Q .0503(8) have been identified as such in the permit. Please note, the requirements for the annual compliance certification are contained in General Condition P in Section 4. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

As the designated responsible official, it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to file a petition for contested case hearing in the North Carolina Office of Administrative Hearings. Information regarding the right, procedure, and time limit for permittees and other persons aggrieved to file such a petition is contained in the attached "Notice Regarding the Right to Contest a Division of Air Quality Permit Decision."

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to existing emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of NCGS 143-215.108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of NCGS



North Carolina Department of Environmental Quality | Division of Air Quality  
217 West Jones Street | 1641 Mail Service Center | Raleigh, North Carolina 27699-1641  
919.707.8400

Mr. Jason Hoffmann  
February 5, 2025  
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143-215.108A and may subject the Permittee to civil or criminal penalties as described in NCGS 143-215.114A and 143-215.114B.

Columbus County has triggered increment tracking under PSD for PM<sub>10</sub>, SO<sub>2</sub>, and NO<sub>x</sub>. This modification will result in a decrease in 21.43 pounds per hour of PM<sub>10</sub>, 137.97 pounds per hours of SO<sub>2</sub>, and 17.58 pounds per hour of NO<sub>x</sub>.

This Air Quality Permit shall be effective from February 5, 2025 and shall expire on the earlier of February 29, 2028 or the renewal of Permit No. 03138T41 has been issued or denied. This Air Quality Permit is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein.

Should you have any questions concerning this matter, please contact Emily Supple at 919-707-8481 or at [Emily.supple@deq.nc.gov](mailto:Emily.supple@deq.nc.gov).

Sincerely yours,



Mark J. Cuilla, EIT, CPM, Chief, Permitting Section  
Division of Air Quality, NCDEQ

Enclosure

c: Laserfiche (2400036)  
Brad Akers, EPA Region 4 (Permit and Review)  
Connie Horne (cover letter only)

## **NOTICE REGARDING THE RIGHT TO CONTEST A DIVISION OF AIR QUALITY PERMIT DECISION**

**Right of the Permit Applicant or Permittee to File a Contested Case:** Pursuant to NCGS 143-215.108(e), a permit applicant or permittee who is dissatisfied with the Division of Air Quality's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 in the Office of Administrative Hearings within 30 days after the Division notifies the applicant or permittee of its decision. If the applicant or permittee does not file a petition within the required time, the Division's decision on the application is final and is not subject to review. The filing of a petition will stay the Division's decision until resolution of the contested case.

**Right of Other Persons Aggrieved to File a Contested Case:** Pursuant to NCGS 143-215.108(e1), a person other than an applicant or permittee who is a person aggrieved by the Division's decision on a permit application may commence a contested case by filing a petition under NCGS 150B-23 within 30 days after the Division provides notice of its decision on a permit application, as provided in NCGS 150B-23(f), or by posting the decision on a publicly available Web site. The filing of a petition under this subsection does not stay the Division's decision except as ordered by the administrative law judge under NCGS 150B-33(b).

**General Filing Instructions:** A petition for contested case hearing must be in the form of a written petition, conforming to NCGS 150B-23, and filed with the Office of Administrative Hearings, 1711 New Hope Church Road, Raleigh NC, 27609, along with a fee in an amount provided in NCGS 150B-23.2. A petition for contested case hearing form may be obtained upon request from the Office of Administrative Hearings or on its website at <https://www.oah.nc.gov/hearings-division/filing/hearing-forms>. Additional specific instructions for filing a petition are set forth at 26 NCAC Chapter 03.

**Service Instructions:** A party filing a contested case is required to serve a copy of the petition, by any means authorized under 26 NCAC 03 .0102, on the process agent for the Department of Environmental Quality:

Daniel S. Hirschman, General Counsel  
North Carolina Department of Environmental Quality  
1601 Mail Service Center  
Raleigh, North Carolina 27699-1601

If the party filing the petition is a person aggrieved other than the permittee or permit applicant, the party **must also** serve the permittee in accordance with NCGS 150B-23(a).

\* \* \*

Additional information is available at <https://www.oah.nc.gov/hearings-division/hearing-process/filing-contested-case>. Please contact the OAH at 984-236-1850 or [oah.postmaster@oah.nc.gov](mailto:oah.postmaster@oah.nc.gov) with all questions regarding the filing fee and/or the details of the filing process.

## Summary of Changes to Permit

The following changes were made to Air Permit No. 03138T46:\*

Page No.	Section	Description of Changes
All	All	<ul style="list-style-type: none"> <li>• Updates dates and permit revision number.</li> </ul>
Throughout	-	<ul style="list-style-type: none"> <li>• Remove coal, No. 4 equivalent used oil, and No. 6 fuel oil from list of permitted fuels for the No. 2 Power Boiler</li> <li>• Remove coal from list of permitted fuels for the No. 5 Power Boiler</li> <li>• Update “bark” and “woodwaste” to “biomass”</li> </ul>
Throughout	-	<ul style="list-style-type: none"> <li>• Remove the following sources: <ul style="list-style-type: none"> <li>○ Nos. 3 and 4 Chip Silos (ID No. ES-CW-5-1)</li> <li>○ Nos. 1 and 2 Chip Silos (ID No. ES-CW-6-1)</li> <li>○ Small Batch Digester System (ID No. ES-SBD)</li> <li>○ Brownstock Washer Set No. 4 (ID No. ES-BSW4)</li> <li>○ Evaporator Set No. 5 (ID No. ES-EVAP5)</li> <li>○ No. 4 Recovery Boiler (ID No. ES-RB4)</li> <li>○ No. 4 Smelt Dissolving Tank (ID No. ES-ST4)</li> <li>○ No. 20 Pulp Dryer (ID No. ES-PD)</li> <li>○ No. 3 Lime Kiln Auxiliary Engine (ID No. ES-EE1)</li> </ul> </li> </ul>
Throughout	-	<ul style="list-style-type: none"> <li>• Convert black liquor oxidation tanks (ID Nos. ES-RX-010 and ES-RX-011) to heavy black liquor storage tanks</li> </ul>
9	2.1 B.1.c	<ul style="list-style-type: none"> <li>• Remove monitoring condition for coal firing for PB2</li> </ul>
10	2.1 B.4.c	<ul style="list-style-type: none"> <li>• Remove monitoring, recordkeeping, reporting conditions for No. 4 equivalent used oil, No. 6 fuel oil, and coal firing for PB2</li> </ul>
11	2.1 B.5.a	<ul style="list-style-type: none"> <li>• Remove emission limit for coal firing for PB2</li> </ul>
16	2.1 C.4.a	<ul style="list-style-type: none"> <li>• Remove emission limit for coal firing for PB5</li> </ul>
16-18	2.1 C.6	<ul style="list-style-type: none"> <li>• Update CO BACT for PB5</li> <li>• Remove coal firing BACT for all pollutants for PB5</li> </ul>
19	2.1 C.8	<ul style="list-style-type: none"> <li>• Added 02Q .0317 condition for avoidance of NSPS Subpart D</li> </ul>
46-49	2.2 A.1	<ul style="list-style-type: none"> <li>• Updates to Subpart S including: <ul style="list-style-type: none"> <li>○ Adding alternate emission limit of 0.002 pounds of chlorinated HAP/ODTP</li> <li>○ Added testing requirement for the Bleach Plant Scrubber every five years</li> <li>○ Added SSM requirements per 40 CFR 63.453(q) and 63.454(g)</li> </ul> </li> </ul>
76	2.2 I.g	<ul style="list-style-type: none"> <li>• Added revised MACT DDDDD emission limits starting October 6, 2025</li> </ul>
68-71	2.2 E	<ul style="list-style-type: none"> <li>• Updated TAP limits based on submitted modeling</li> </ul>
80	3	<ul style="list-style-type: none"> <li>• Move emergency engines (ID Nos. ES-EE2 and ES-EE3) to insignificant sources list</li> </ul>
81-88	4	<ul style="list-style-type: none"> <li>• Updated General Conditions to most recent version (8.0, 07/10/24)</li> </ul>
-	-	<ul style="list-style-type: none"> <li>• Removed 112(j) SSM requirements for Subpart S</li> </ul>
-	-	<ul style="list-style-type: none"> <li>• Removed requirements for 40 CFR 63 Subpart GGGGG</li> </ul>

\* This list is not intended to be a detailed record of every change made to the permit but a summary of those changes.



State of North Carolina  
Department of Environmental Quality  
Division of Air Quality

## AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
03138T47	03138T46	February 5, 2025	February 29, 2028*

\*This permit shall expire on the earlier of February 29, 2028 or the renewal of Permit No. 03138T41 has been issued or denied.

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 02D and 02Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 02Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

**Permittee:** International Paper – Riegelwood Mill  
**Facility ID:** 2400036  
**Primary SIC Code:** 2621  
**NAICS Code:** 322121

**Facility Site Location:** 865 John L. Riegel Road  
**City, County, State, Zip:** Riegelwood, Columbus County, NC 28456  
**Mailing Address:** 865 John L. Riegel Road  
**City, State, Zip:** Riegelwood, NC 28456

**Application Number(s):** 2400036.24B  
**Complete Application Date(s):** April 30, 2024

**Division of Air Quality,**  
**Regional Office Address:** Wilmington Regional Office  
127 Cardinal Drive Extension  
Wilmington, NC 28405

Permit issued this the 5th day of February, 2025.

Mark J. Cuilla, EIT, CPM, Chief, Air Permitting Section  
By Authority of the Environmental Management Commission

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## List of Acronyms

<b>AOS</b>	Alternative Operating Scenario
<b>BACT</b>	Best Available Control Technology
<b>BAE</b>	Baseline Actual Emissions
<b>Btu</b>	British thermal unit
<b>CAA</b>	Clean Air Act
<b>CAM</b>	Compliance Assurance Monitoring
<b>CEMS</b>	Continuous Emission Monitoring System
<b>CEDRI</b>	Compliance and Emissions Data Reporting Interface
<b>CFR</b>	Code of Federal Regulations
<b>CO</b>	Carbon Monoxide
<b>COMS</b>	Continuous Opacity Monitoring System
<b>CSAPR</b>	Cross-State Air Pollution Rule
<b>DAQ</b>	Division of Air Quality
<b>DEQ</b>	Department of Environmental Quality
<b>EMC</b>	Environmental Management Commission
<b>EPA</b>	Environmental Protection Agency
<b>FR</b>	Federal Register
<b>GACT</b>	Generally Available Control Technology
<b>GHGs</b>	Greenhouse Gases
<b>HAP</b>	Hazardous Air Pollutant
<b>LAER</b>	Lowest Achievable Emission Rate
<b>MACT</b>	Maximum Achievable Control Technology
<b>NAA</b>	Non-Attainment Area
<b>NAAQS</b>	National Ambient Air Quality Standards
<b>NAICS</b>	North American Industry Classification System
<b>NCAC</b>	North Carolina Administrative Code
<b>NCGS</b>	North Carolina General Statutes
<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>NSPS</b>	New Source Performance Standard
<b>NSR</b>	New Source Review
<b>OAH</b>	Office of Administrative Hearings
<b>PAE</b>	Projected Actual Emissions
<b>PAL</b>	Plantwide Applicability Limitation
<b>PM</b>	Particulate Matter
<b>PM<sub>2.5</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 2.5 Micrometers or Less
<b>PM<sub>10</sub></b>	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
<b>POS</b>	Primary Operating Scenario
<b>PSD</b>	Prevention of Significant Deterioration
<b>PTE</b>	Potential to Emit
<b>RACT</b>	Reasonably Available Control Technology
<b>SIC</b>	Standard Industrial Classification
<b>SIP</b>	State Implementation Plan
<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>TAP</b>	Toxic Air Pollutant
<b>tpy</b>	Tons Per Year
<b>VOC</b>	Volatile Organic Compound

## SECTION 1 - PERMITTED EMISSION SOURCE(S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE(S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
<b>Power Operations</b>			
ES-PB2  <b>PSD</b>  <b>NSPS Subpart BB Control Device</b>  <b>MACT Subpart S Control Device</b>  <b>MACT DDDDD</b>	No. 2 Power Boiler – natural gas/No. 2 fuel oil/biomass/wood fiber sludge/biomass absorbed oil residue/TRS gas-fired (425 million Btu per hour nominal heat input rate)	CD-PB2-MC and CD-PB2-SCRB	multicyclone (240, nine inch diameter tubes each) and a venturi scrubber (1,500 gallons per minute nominal minimum scrubber solution injection rate)
ES-PB5  <b>PSD</b>  <b>NSPS Subpart BB Control Device</b>  <b>MACT Subpart S Control Device</b>  <b>MACT DDDDD</b>	No. 5 Power Boiler – No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass/wood fiber sludge/biomass absorbed oil residue/TRS gas-fired (249 million Btu per hour maximum heat input rate from burning No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass absorbed oil residue, 600 million Btu per hour nominal heat input rate from biomass/wood fiber sludge and No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass absorbed oil residue combination firing) utilizing an Over-Fire Air (OFA) combustion system	CD-PB5-MC and CD-PB5-SCRB	multicyclone (304 nine inch diameter tubes) and a venturi scrubber (1,300 gallons per minute nominal minimum scrubber solution injection rate)
ES-PKB-1 and ES-PKB-2	Nos. 1 and 2 Temporary Package Boilers – No. 2 fuel oil/natural gas fired, heat input between 10 and 100 million Btu per hour each.	NA	None
<b>Wood Yard</b>			
ES-WDYD*	Woodyard	NA	NA
ES-CW-1-1	No. 1 Truck dump cyclone	CD-CW-1-1	Simple cyclone (95 inches in diameter)
ES-CW-4-1	No. 4 Truck dump and railcar roll-over dump cyclone	CD-CW-4-1	Simple cyclone (72 inches in diameter)
<b>Pulping Operations</b>			
ES-O2D1 <b>MACT Subpart S</b>	Oxygen delignification system (including a pre-oxygen washer, reactor, blow tank, post oxygen washer, screens, knotters, and	NA	No control required per Clean Condensate Alternative under 40 CFR §63.447



<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
	deckers)		
ES-LBD <b>MACT Subpart S</b>	Large batch digester system (five large batch digesters with associated blow tank, filtrate flash tank and turpentine condensing systems)	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System
ES-K1 <b>PSD</b> <b>NSPS Subpart BB</b> <b>MACT Subpart S</b>	K1 fiber line (one Kamyr continuous digester with associated steaming vessel, blow tank, filtrate flash tank and dedicated turpentine condensing system)	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System
ES-LUND <b>MACT Subpart S</b>	Lundberg Turpentine System	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System
ES-GOSL <b>MACT Subpart S</b>	Goslin Turpentine System	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System
ES-BSW1 <b>MACT Subpart S</b>	Brown stock washer set No. 1	NA	No control required per Clean Condensate Alternative under 40 CFR §63.447
ES-ZG008 and ES-ZG0081 <b>NSPS Subpart BB</b> <b>MACT Subpart S</b>	No. 1 condensate stripper and No. 6 condensate stripper (formerly referred to as No. 2 condensate stripper)	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System
<b>Chemical Recovery</b>			
ES-EVAP6  ES-WELL4  ES-CSFT1  ES-CSFT6 <b>NSPS Subpart BB</b> <b>MACT Subpart S</b>	Evaporator set (No. 6)  No. 4 Hotwell  No. 1 Condensate Steam Stripper Feed Tank  No. 6 Condensate Steam Stripper Feed Tank	ES-PB2  or  ES-PB5	No. 2 Power Boiler via NCG Collection System  or  No. 5 Power Boiler via NCG Collection System

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-RX-010* and ES-RX-011*	Two heavy black liquor storage tanks *	NA	NA
ES-RB5  <b>PSD BACT NSPS BB MACT MM</b>	Recovery Boiler No. 5 - black liquor solids/No. 2 fuel oil/ultra-low sulfur No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/Natural gas (nominal 7.39 million pounds of black liquor solids per day average/nominal 140 million Btu per hour heat input rate from firing fuel oil/254 million Btu per hour heat input rate from firing natural gas)	CD-RB5-ESP	Electrostatic Precipitator (328,248 square feet of collecting plate area)
ES-ST5E and ES-ST5W  <b>PSD NSPS Subpart BB MACT Subpart MM</b>	No. 5 East and West smelt dissolving tanks	CD-5EST-1  and CD-5WST-1	wet scrubber-fan impingement type (135 gallons per minute scrubber solution injection rate) and wet scrubber-fan impingement type (135 gallons per minute scrubber solution injection rate), installed one each respectively
ES-G96*	Big M weak black liquor tank*	NA	NA
ES-R0264*	50% Black liquor storage tank*	NA	NA
ES-R0265*	50% Black liquor storage tank*	NA	NA
ES-R0266*	50% Black liquor storage tank*	NA	NA
ES-Z5091*	65% Black liquor storage tank*	NA	NA
ES-Z5096*	65% Black liquor storage tank*	NA	NA
ES-T001	Weak black liquor tank	NA	NA
ES-T002	Weak black liquor BMP tank	NA	NA
ES-T003*	65% Black liquor storage tank*	NA	NA
<b>Causticizing and Lime Recovery</b>			
ES-SLK3	Lime slaker No. 3	CD-H-317	wet scrubber-open spray type (35 gallons per minute water injection rate)
ES-SLK6	Lime slaker No. 6	CD-H-259	wet scrubber-open spray type (35 gallons per minute water injection rate)
ES-K4001 <b>NSPS Subpart BB MACT Subpart MM</b>	Lime kiln No. 4 - No. 6 fuel oil/No. 4 equivalent used oil/No. 2 fuel oil/natural gas-fired (212 million Btu per hour nominal heat input rate)	CD-K4021  and CD-K4006	electrostatic precipitator (36,975 square feet of collecting plate area) and wet scrubber - fixed throat, spray venturi type
ES-LH-Reburnt	Reburnt lime handling system (enclosed belt conveyor and bucket elevator)	CD-H-367	bagfilter (1005 square feet of filter area)
ES-RLS1	Reburnt lime silo No. 1		
ES-RLS2	Reburnt lime silo No. 2		

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-H-84	Fresh lime silo (causticizing area)	CD-H-85	bagfilter (25 square feet of filter area)
ES-H-325*	No. 3 Set, Causticizer No. 1*	NA	NA
ES-H-327*	No. 3 Set, Causticizer No. 2*	NA	NA
ES-H-329*	No. 3 Set, Causticizer No. 3*	NA	NA
ES-H-332*	No. 5 Set, Causticizer No. 1*	NA	NA
ES-H-185*	No. 5 Set, Causticizer No. 2*	NA	NA
ES-H-184*	No. 5 Set, Causticizer No. 3*	NA	NA
ES-H-191*	Clarifier No. 6, Green Liquor*	NA	NA
ES-H-171*	Clarifier No. 7, Green Liquor*	NA	NA
ES-H-226*	Clarifier No. 7, White Liquor*	NA	NA
<b>Bleaching Operations</b>			
ES-BP1 <b>MACT Subpart S</b>	Bleach plant No. 1	CD-BP-SCRB (stages where chlorinated compounds are introduced)	wet scrubber with caustic injection (130 gallons per minute nominal minimum caustic solution injection rate)
ES-BP2 <b>MACT Subpart S</b>	Bleach plant No. 2		
ES-BP3 <b>MACT Subpart S</b>	Bleach plant No. 3		
ES-LL-155*	No. 3 chlorine dioxide generator single vessel process (SVP)*	CD-LL-283	wet scrubber-dual packed tower type with caustic injection (50 gallons per minute nominal minimum caustic injection rate)
ES-LL-140* <b>NSPS Subpart Kb</b>	Methanol storage tank (18,275 gallons)*	CD-LL-140-CV	conservation vent valve
ES-LO587* ES-LO625* ES-LO83* ES-LO84* ES-LO85*	Five (5) chlorine dioxide solution storage tanks*	CD-L-093	wet scrubber-two stage, packed tower type (450 gallons per minute nominal minimum caustic injection rate)
<b>Pulp Drying</b>			
ES-JJ-030	No. 18 Pulp Dryer	NA	NA
<b>Water Treatment</b>			
ES-V-139	Filter plant fresh lime bin	CD-V-142	bagfilter (25 square feet of filter area)
<b>Miscellaneous Sources</b>			
ES-HRDS*	Haul Roads*	NA	NA
ES-WWTS*	Wastewater treatment system*	NA	NA

\* Sources identified with an asterisk have no applicable requirements under the North Carolina SIP, but their emissions are greater than the thresholds under 15A NCAC 02Q .0503(8); these sources are permitted pursuant to 15A NCAC 02Q .0508(i)(15).

## SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

### 2.1 Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

#### A. RESERVED

#### B. No. 2 Power Boiler (ID No. ES-PB2) – natural gas/No. 2 fuel oil/biomass/wood fiber sludge/biomass absorbed oil residue-fired power boiler with TRS gas injection (425 million Btu per hour nominal heat input rate), controlled by a multicyclone (240, nine inch diameter tubes each, ID No. CD-PB2-MC) and a venturi scrubber (1,500 gallons per minute nominal minimum scrubber solution injection rate, ID No. CD-PB2-SCRB)

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Sulfur Dioxide	1.6 pounds per million Btu heat input	15A NCAC 02D .0501(c)
Particulate Matter	0.16 pounds per million Btu heat input (when firing natural gas/ fuel oil only) 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only)  OR  $Ec = [(Ew)(Qw) + (Eo)(Qo)]/Qt$ Where; Ec = emission limit for combined firing (pounds per million Btu) Ew = 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only) Eo = 0.16 pounds per million Btu heat input (when firing natural gas/ fuel oil only) Qw=actual wood heat input including wood fiber sludge Qo=actual heat input other than wood heat input; and Qt = Qw + Qo	15A NCAC 02D .0503  15A NCAC 02D .0504
Sulfur Dioxide	2.3 pound per million Btu heat input	15A NCAC 02D .0516
Sulfur Dioxide and Opacity	Monitoring requirements	15A NCAC 02D .0606
Nitrogen Oxides	0.8 pounds per million Btu heat input while burning oil or natural gas	15A NCAC 02D .0519
Visible Emissions	40 percent opacity when averaged over a six-minute period except that six-minute periods averaging not more than 90 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period	15A NCAC 02D .0521
HAPs	See Specific Condition 2.2 I.1 – MACT Subpart DDDDD	15A NCAC 02D .1111
PM, PM <sub>10</sub> , PM <sub>2.5</sub> , Nitrogen Oxides, GHGs, Carbon Monoxide	None	15A NCAC 02D .0530

#### 1. 15A NCAC 02D .0501: COMPLIANCE WITH EMISSION CONTROL STANDARDS

- a. Emissions of sulfur dioxide from this source shall not exceed 1.6 pounds per million Btu heat input. Sulfur dioxide

formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0501(c)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0501(c).

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, in addition to the flow rate monitoring requirements for the wet scrubber in Section 2.1 B.2.c through e below, the Permittee shall also monitor the pH of the scrubber liquid. The Permittee shall install, operate, and maintain a pH meter on the wet scrubber. Unless the scrubber is being cleaned, the pH of the scrubber effluent recirculation line shall be:
  - i. at or above 6.2 when burning biomass or natural gas with TRS gases, or
  - ii. at or above 6.4 when burning biomass or natural gas with fuel oil and TRS gases.

These operating parameter limits do not apply during stack testing conducted to establish new operating parameter limits.

During cleaning, only biomass and/or natural gas may be fired in the boiler. The wet scrubber is not required while the boiler is burning solely natural gas.

- d. The Permittee shall record the pH of the scrubbing liquid once a day. A 1-hour average value may be recorded. If the recorded pH of the scrubber effluent recirculation line is not at or above the applicable minimum value in 2.1 B.1.c. above, the Permittee shall take appropriate corrective action within the monitoring period to return the pH to the appropriate operating range and record the action taken. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0501(c) if the pH is not corrected within the monitoring period. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If the emission source(s) is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily observation.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the combustion of natural gas/No. 2 fuel oil that are discharged from this source into the atmosphere shall not exceed 0.16 pounds per million Btu heat input. [15A NCAC 02D .0503(c)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from the No. 2 Power Boiler (ID No. ES-PB2) shall be controlled by the multicyclone and venturi scrubber (ID Nos. CD-PB2-MC and CD-PB2-SCRB). The wet scrubber is not required while the boiler is burning solely natural gas. The Permittee shall comply with the PM monitoring and recordkeeping requirements as specified in Sections 2.2 I.1.k through z. If the 30-day average scrubbing liquid flow rate and/or the 30-day average scrubber pressure drop is below the applicable operating limit, the Permittee shall take and record appropriate corrective action to return the parameter(s) to the correct operating range. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503 if the monitoring/recordkeeping is not performed or if an out of range scrubbing liquid flow rate or pressure drop is not corrected within 24 operating hours.
- d. The results of the corrective action activities, discussed above for the scrubber, shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative of DAQ upon request. The logbook shall record the following:

- i. the date and time of each recorded action
- ii. the results of each corrective action;
- iii. the causes for any variance from the allowable operating range for the scrubber; and
- iv. corrective actions taken.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503 if the records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**3. 15A NCAC 02D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0504]

$$Ec = [(Ew)(Qw) + (Eo)(Qo)]/Qt$$

Where;

Ec = emission limit for combined firing (pounds per million Btu);

Ew = 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only)

Eo = 0.16 pounds per million Btu heat input (when firing natural gas/fuel oil only)

Qw = actual wood heat input including wood fiber sludge in Btu per hour;

Qo = actual heat input other than wood heat input in Btu per hour; and

Qt = Qw + Qo

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the No. 2 Power Boiler (ID No. ES-PB2) for particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in General Condition JJ. The testing shall be performed once every five years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results are less than 80 percent of the emission limit for two consecutive tests, at which time the testing frequency may return to every 5 years. If the results of this or any test is above the limit given in Section 2.1 B.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

**Monitoring/Recordkeeping/Reporting** [NCAC 02Q .0508(f)]

- d. To ensure compliance, the Permittee shall follow the monitoring, recordkeeping, and reporting requirements in Sections 2.1 B.2.c through e above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if the monitoring and recordkeeping are not performed as specified in Section 2.1 B.2 c and e above.

**4. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f) and 02D .0606]

- c. No monitoring, recordkeeping, or reporting is required for combustion of biomass, natural gas, or No. 2 fuel oil in this source.

**5. 15A NCAC 02D .0519: CONTROL OF NITROGEN OXIDES EMISSIONS**

- a. Emissions of nitrogen oxides from this source when burning natural gas and No. 2 fuel oil shall not exceed 0.8 pounds per million Btu heat input. [15A NCAC 02D .0519]:

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.5.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0519.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required from the firing of natural gas or No. 2 fuel oil in this source for this regulation.

**6. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from this source shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity. [15A NCAC 02D .0521(c)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.6.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f) and 02D .0606]

- c. This source has a wet stack. The monitoring, recordkeeping, and reporting requirements for demonstrating compliance given in section 2.1 B.2.c through e above are deemed sufficient to demonstrate compliance with 15A NCAC 02D .0521. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the required monitoring and recordkeeping are not conducted as specified in Section 2.1 B.2.c.

**7. 15A NCAC 02D .0606: SOURCES COVERED BY APPENDIX P OF 40 CFR PART 51 (CONTINUOUS OPACITY MONITORING AND EXCESS EMISSIONS)**

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f) and 02D .0606]

- a. Opacity from the No. 2 Power Boiler (ID No. ES-PB2) shall be controlled by the multicyclone and venturi scrubber (ID Nos. CD-PB2-MC and CD-PB2-SCRB). The wet scrubber is not required while the boiler is burning solely natural gas. To ensure compliance and the effective operation of the scrubber, as described in NCDAQ's March 13, 2012 "Approval of Petition for Alternative Opacity Monitoring on No. 2 and No. 5 Power Boilers" letter, the Permittee shall install, operate, and maintain a scrubbing liquid flowmeter and pressure drop indicator on the scrubber. To ensure compliance and the effective operation of the scrubber, the Permittee shall comply with the 40 CFR 63, Subpart DDDDD PM monitoring and recordkeeping requirements as specified in Section 2.2 I. If the 30-day average scrubbing liquid flow rate and/or the 30-day average scrubber pressure drop is below the applicable operating limit, the Permittee shall take and record appropriate corrective action to return the parameter(s) to the correct operating range within 24 operating hours. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0606 if the monitoring is not performed or the operating parameters are not corrected within 24 hours.
- b. The quarterly excess emissions (EE) reports required under Appendix P of 40 CFR Part 51 shall be used as an indication of good operation and maintenance of the multicyclone and scrubber. These sources shall be deemed to be properly operated and maintained if the percentage of time the monitored scrubber parameters are below the established operating parameter ranges does not exceed 3.0 percent of the total operating time for any given calendar quarter, adjusted for monitor downtime (MD) as calculated below. In addition, these sources shall be deemed to be properly operated and maintained if the %MD does not exceed 3.0 percent.

Calculations for %EE and %MD

Percent Excess Emission (%EE) Calculation:

$$\%EE = \frac{\text{Total Excess Emission Time}^*}{(\text{Total Source Operating Time}^{***}) - (\text{Monitor Downtime})} \times 100$$

Percent Monitor Downtime (%MD) Calculation:

$$\%MD = \frac{\text{Total Monitor Downtime}^{**}}{(\text{Total Source Operating Time}^{***})} \times 100$$

- \* Total Excess Emission Time contains any 3-hour period below the established monitoring parameter range, including startup, shutdown, and malfunction.
- \*\* Total Monitor Downtime includes Quality Assurance (QA) activities unless exempted by regulation or defined in an agency approved QA Manual. The amount of exempt QA Time will be reported in the quarterly report as such.
- \*\*\* If a source operates less than 2200 hours during any quarter, the source may calculate the %EE and/or %MD using all operating data for the current quarter and the preceding quarters until 2200 hours of data are obtained. [N.C.G.S. 143-215.110]

Testing [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 B.6.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

Reporting [15A NCAC 02Q .0508(f) and 02D .0606]

- d. The Permittee shall submit the excess emissions and monitor downtime reports as required under Appendix P of 40 CFR Part 51 no later than January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.



**C. No. 5 Power Boiler (ID No. ES-PB5) –No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass/wood fiber sludge/biomass absorbed oil residue-fired power boiler with TRS gas injection (249 million Btu per hour maximum heat input rate from burning No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass absorbed oil residue, 600 million Btu per hour nominal heat input rate from biomass/wood fiber sludge and No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass absorbed oil residue combination firing), utilizing an Over-Fired Air (OFA) combustion system and controlled by a multicyclone (56, twenty-four (24) inch diameter tubes each, ID No. CD-PB5-MC) and a venturi scrubber (1,300 gallons per minute nominal minimum scrubber solution injection rate, ID No. CD-PB5-SCRB)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	<p>0.16 pounds per million Btu heat input (when firing natural gas/fuel oil only) 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only)</p> <p>OR</p> $Ec = [(Ew)(Qw) + (Eo)(Qo)]/Qt$ <p>Where; Ec = emission limit for combined firing (pounds per million Btu); Ew = 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only) Eo = 0.16 pounds per million Btu heat input (when firing natural gas/ fuel oil only) Qw = actual wood heat input including wood fiber sludge in Btu per hour; Qo = actual heat input other than wood heat input in Btu per hour; and Qt = Qw + Qo</p>	<p>15A NCAC 02D .0503 15A NCAC 02D .0504</p>
Sulfur Dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Nitrogen Oxides	0.8 pound per million Btu heat input while burning oil or natural gas	15A NCAC 02D .0519
Visible Emissions	20 percent opacity when averaged over a six-minute period except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period	15A NCAC 02D .0521
Particulate Matter	0.0562 pound per million Btu heat input (while burning oil) 0.25 pounds per million Btu heat input (while burning biomass/wood fiber sludge)	15A NCAC 02D .0530
Sulfur Dioxide	0.80 pounds per million Btu heat input (while burning oil) 0.024 pound per million Btu heat input (while burning biomass/wood fiber sludge)	
Nitrogen Oxides	0.367 pound per million Btu heat input (while burning oil) 0.35 pound per million Btu heat input (while burning biomass/wood fiber sludge)	
Carbon Monoxide	0.033 pound per million Btu heat input, 24-hour average (while burning fuel oil only; this limit to be pro-rated based on heat input with the 0.50 lb/MMBtu biomass limit when burning less than 50% biomass and ≥50% fuel oil by heat input) 0.50 pound per million Btu heat input, 24-hour average (while burning less than 50% by heat input biomass and ≥50% by heat input fuel oil or natural gas)	

Pollutant	Limits/Standards	Applicable Regulations
Volatile Organic Compounds	0.714 pound per million Btu heat input, 24-hour average (while burning $\geq 50\%$ by heat input biomass and $\leq 50\%$ by heat input fuel oil and natural gas) 0.00187 pound per million Btu heat input (while burning oil) 0.213 pound per million Btu heat input (while burning biomass/wood fiber sludge)	
PM, PM <sub>10</sub> , PM <sub>2.5</sub> , Nitrogen Oxides, GHGs, Carbon Monoxide	None	15A NCAC 02D .0530
Opacity	Monitoring requirements	15A NCAC 02D .0607
HAPs	See Specific Condition 2.2 I.1 – MACT Subpart DDDDD	15A NCAC 02D .1111
-	See Section 2.1 C.8	15A NCAC 02Q .0317 (Avoidance of NSPS)

#### 1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from the combustion of natural gas/No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil that are discharged from this source into the atmosphere shall not exceed 0.16 pound per million Btu heat input. [15A NCAC 02D .0503(c)]

##### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.
- c. **Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]  
Particulate matter emissions from the No. 5 Power Boiler (ID No. ES-PB5) shall be controlled by the multicyclone and venturi scrubber (ID Nos. CD-PB5-MC and CD-PB5-SCRB). The wet scrubber is not required to be operated while the boiler is burning solely natural gas. The Permittee shall install, operate, and maintain a scrubbing liquid flowmeter and pressure drop indicator on the scrubber. To ensure compliance and the effective operation of the scrubber, the Permittee shall comply with the PM monitoring and recordkeeping requirements as specified in Section 2.2 I.1.k through z. If the 30-day average scrubbing liquid flow rate and/or the 30-day average scrubber pressure drop is below the applicable operating limit, the Permittee shall take and record appropriate corrective action to return the parameter(s) to the correct operating range. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503 if the monitoring/recordkeeping is not performed or if an out of range scrubbing liquid flow rate or pressure drop is not corrected within 24 operating hours.
- d. The results of the corrective action activities, discussed above for the scrubber, shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative of DAQ upon request. The logbook shall record the following:
  - i. the date and time of each recorded action
  - ii. the results of each corrective action;
  - iii. the causes for any variance from the allowable operating range for the scrubber; and
  - iv. corrective actions taken.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503 if the records are not maintained.

##### **Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## 2. 15A NCAC 02D .0504: PARTICULATES FROM WOODBURNING INDIRECT HEAT EXCHANGERS

- a. Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0504]

$$Ec = [(Ew)(Qw) + (Eo)(Qo)]/Qt$$

Where;

Ec = emission limit for combined firing (pounds per million Btu);

Ew = 0.25 pounds per million Btu heat input (when firing biomass/wood fiber sludge only)

Eo = 0.16 pounds per million Btu heat input (when firing natural gas/fuel oil only)

Qw = actual wood heat input including wood fiber sludge;

Qo = actual heat input other than wood heat input; and

Qt = Qw + Qo

### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the No. 5 Power Boiler (ID No. ES-PB5) for particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in General Condition JJ. The testing shall be performed once every 5 years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results of two consecutive tests are less than 80 percent of the limit, at which time the testing frequency may return to every 5 years. If the results of this or any test is above the limit given in Section 2.1 C.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504.

### **Monitoring/Recordkeeping/Reporting** [NCAC 02Q .0508(f)]

- d. To ensure compliance, the Permittee shall follow the monitoring, recordkeeping, and reporting requirements per Specific Conditions 2.1 C.1.c through e. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0504 if the required monitoring and recordkeeping are not conducted as specified in Sections 2.1 C.1.c and 2.1 C.1.d.

## 3. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

### **Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, in addition to the flow rate monitoring requirements for the wet scrubber in Section 2.1 C.1.c through e above, the Permittee shall also monitor the pH of the scrubber liquid if TRS gases, No. 4 fuel oil, and/or No. 6 fuel oil are being burned. The Permittee shall install, operate, and maintain a pH meter on the wet scrubber. The pH of the scrubber effluent recirculation line shall be at or above 7.1 unless the scrubber is being cleaned or if the boiler is firing only biomass, sludge, No. 2 fuel oil, and/or natural gas. During cleaning, only biomass and/or natural gas may be fired in the boiler. The wet scrubber is not required while the boiler is burning solely natural gas.
- d. The Permittee shall record the pH of the scrubbing liquid once a day if TRS gases, No. 4 fuel oil, and/or No. 6 fuel oil are being burned. A 1-hour average value may be recorded. If the recorded pH of the scrubber effluent recirculation line is not at or above 7.1, the Permittee shall take appropriate corrective action within the monitoring period to return the pH to the appropriate operating range and record the action taken. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516 if an out of range pH is not corrected within the monitoring

period or if the pH of the scrubbing liquid is not recorded once a day if TRS gases, No. 4 fuel oil, and/or No. 6 fuel oil are being burned. The Permittee shall be allowed three (3) days of absent observations per semi-annual period without being deemed in noncompliance with 15A NCAC 02D .0516.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D .0519: CONTROL OF NITROGEN OXIDES EMISSIONS**

- a. Emissions of nitrogen oxides from this source when burning natural gas, No. 2 fuel oil, No. 4 equivalent used oil, or No. 6 fuel oil shall not exceed 0.8 pounds per million Btu heat input [15A NCAC 02D .0519]:

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0519.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required from the firing of natural gas, No. 2 fuel oil, No. 4 equivalent used oil, or No. 6 fuel oil in this source for this regulation.

**5. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from this source shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.5.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [NCAC 02Q .0508(f) and 02D .0607]

- c. This emission source has a wet stack. The monitoring, recordkeeping, and reporting requirements for demonstrating compliance given in section 2.1 C. 1. c. through e. above are deemed sufficient to demonstrate compliance with 15A NCAC 02D .0521. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the required monitoring and recordkeeping are not conducted as specified in Sections 2.1 C.1.c and 2.1 C.1.d.

**6. 15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. The Permittee shall comply with the following BACT during all periods of operations (normal, startup, shutdown, and malfunction):

Pollutant	Emission Limits
Particulate matter	0.0562 pounds per million Btu heat input for oil 0.25 pounds per million Btu heat input for biomass/wood fiber sludge
Sulfur dioxide	0.80 pounds per million Btu heat input for oil 0.024 pounds per million Btu heat input for biomass/wood fiber sludge
Nitrogen Oxides	0.367 pounds per million Btu heat input for oil 0.35 pounds per million Btu for biomass/wood fiber sludge

Carbon Monoxide	0.033 pounds per million Btu heat input for fuel oil only; this limit to be prorated based on heat input with the 0.50 lb/MMBtu biomass limit when burning less than 50% biomass and $\geq 50\%$ fuel oil by heat input (24-hour average) 0.50 pounds per million Btu heat input while burning less than 50% by heat input biomass and $\geq 50\%$ by heat input fuel oil or natural gas (24-hour average) 0.714 pounds per million Btu heat input while burning $\geq 50\%$ by heat input biomass and $\leq 50\%$ by heat input fuel oil and natural gas (24-hour average)
Volatile Organic Compounds	0.00187 pounds per million Btu heat input for oil 0.213 pounds per million Btu heat input for biomass/wood fiber sludge

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 C.6.a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall conduct an initial performance test for the No. 5 Power Boiler (ID No. ES-PB5) in accordance with a testing protocol approved by the DAQ to confirm compliance with the newly developed BACT. The following operating scenarios shall be tested: (1) burning less than 50% biomass by heat input and  $\geq 50\%$  natural gas or fuel oil by heat input and (2) burning  $\geq 50\%$  biomass by heat input and  $\leq 50\%$  fuel oil and natural gas by heat input. Details of the emissions testing and reporting requirements can be found in General Condition JJ. Testing shall be completed and the results submitted within 180 days of issuance of Permit No. 03138T47 unless an alternate date is approved by the DAQ. If the testing is not completed, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- d. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the No. 5 Power Boiler (ID No. ES-PB5) for Particulate Matter (PM), Sulfur Dioxide (SO<sub>2</sub>), Nitrogen Oxides (NO<sub>x</sub>), Carbon Monoxide (CO) and Volatile Organic Compounds (VOCs) in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in General Condition JJ. The testing shall be performed every 5 years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results of two consecutive tests are less than 80 percent of the limit, at which time the testing frequency may return to every 5 years. If the results of this or any test are above the limit given in Section 2.1 C.6.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- e. The maximum permitted heat input rate of No. 5 Power Boiler from fossil fuel firing shall not exceed 249 million Btu per hour (annual average). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the heat input rate of No. 5 Power Boiler from fossil fuel exceeds 249 million Btu per hour (annual average).
- f. The Permittee shall demonstrate compliance with the fossil fuel heat input rate by using measured fuel heat content (either direct analysis or vendor certifications) and a flow device (i.e., mass flow meters for liquid fuels, etc.) as approved by the DAQ. If the results of any calculations or estimation (of fossil fuel heat input) indicate that fossil fuel heat input to the boiler exceeds the limit given in Section 2.1 C.6.e above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- g. The Permittee shall maintain heat input calculations, associated measurements, and analytical results. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the calculations, measurements, or analytical results are not maintained.
- h. To ensure compliance with the sulfur dioxide limit in Section 2.1 C.6.a, above, the maximum sulfur content of any No. 2 fuel oil received and fired in the affected boiler (ID No. PB5) shall not exceed 0.5 percent by weight.
- i. The Permittee shall retain a copy of the fuel supplier certification for any No. 2 fuel oil fired in Power Boiler 5 (ID No. PB5). The fuel supplier certification shall include the following information:
  - i. The name of the oil supplier; and
  - ii. The sulfur content of the oil (in percent by weight);
The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the sulfur content of the oil exceeds the limit provided in Section 2.1 C.6.h, above, or if fuel supplier certifications are not retained as described above.

**Reporting** [15A NCAC 02Q .0508 (f)]

- j. The Permittee shall submit a summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and

recordkeeping activities within 30 days after each semi-annual period, due by January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**7. 15A NCAC 02D .0607: LARGE WOOD AND WOOD-FOSSIL FUEL COMBINATION UNITS (CONTINUOUS OPACITY MONITORING AND EXCESS EMISSIONS)**

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f) and 02D .0607]

- a. Opacity from the No. 5 Power Boiler (ID No. ES-PB5) shall be controlled by the multicyclone and venturi scrubber (ID Nos. CD-PB5-MC and CD-PB5-SCRB). The wet scrubber is not required while the boiler is burning solely natural gas. To ensure compliance and the effective operation of the scrubber, as described in NCDAQ's March 13, 2012 "Approval of Petition for Alternative Opacity Monitoring on No. 2 and No. 5 Power Boilers" letter, the Permittee shall install, operate, and maintain a scrubbing liquid flowmeter and pressure drop indicator on the scrubber. To ensure compliance and the effective operation of the scrubber, the Permittee shall comply with the 40 CFR 63, Subpart DDDDD PM monitoring and recordkeeping requirements as specified in Section 2.2 I. If the 30-day average scrubbing liquid flow rate and/or the 30-day average scrubber pressure drop is below the applicable operating limit, the Permittee shall take and record corrective action to return the parameter(s) to the correct operating range within 24 operating hours. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0607 if the monitoring is not performed or if the operating parameters are not corrected within 24 hours.
- b. The quarterly excess emissions (EE) reports required under Appendix P of 40 CFR Part 51 shall be used as an indication of good operation and maintenance of the multicyclone and scrubber. These sources shall be deemed to be properly operated and maintained if the percentage of time the monitored scrubber parameters are below the established operating parameter ranges does not exceed 3.0 percent of the total operating time for any given calendar quarter, adjusted for monitor downtime (MD) as calculated below. In addition, these sources shall be deemed to be properly operated and maintained if the %MD does not exceed 3.0 percent.

**Calculations for %EE and %MD**

**Percent Excess Emission (%EE) Calculation:**

$$\%EE = \frac{\text{Total Excess Emission Time}^*}{(\text{Total Source Operating Time}^{***}) - (\text{Monitor Downtime})} \times 100$$

**Percent Monitor Downtime (%MD) Calculation:**

$$\%MD = \frac{\text{Total Monitor Downtime}^{**}}{(\text{Total Source Operating Time}^{***})} \times 100$$

- \* Total Excess Emission Time contains any 3-hour period below the established monitoring parameter range, including startup, shutdown, and malfunction.
- \*\* Total Monitor Downtime includes Quality Assurance (QA) activities unless exempted by regulation or defined in an agency approved QA Manual. The amount of exempt QA Time will be reported in the quarterly report as such.
- \*\*\* If a source operates less than 2200 hours during any quarter, the source may calculate the %EE and/or %MD using all operating data for the current quarter and the preceding quarters until 2200 hours of data are obtained. [N.C.G.S. 143-215.110]

**Testing** [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 C.5.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Reporting** [15A NCAC 02Q .0508(f) and 02D .0606]

- d. The Permittee shall submit the excess emissions and monitor downtime reports as required under Appendix P of 40 CFR Part 51 no later than January 30 of each calendar year for the preceding three-month period between October and December, April 30 of each calendar year for the preceding three-month period between January and March, July 30 of each calendar year for the preceding three-month period between April and June, and October 30 of each

calendar year for the preceding three-month period between July and September. All instances of deviations from the requirements of this permit must be clearly identified.

**8. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS  
for 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS**

- a. Per 15A NCAC 02Q .0317, in order to avoid applicability of 15A NCAC 02D .0524, NSPS Subpart D, the No. 5 Power Boiler (ID No. ES-PB5) shall be limited to a heat input rate of less than 250 million Btu per hour while firing No. 2 fuel oil/No. 4 equivalent used oil/No. 6 fuel oil/natural gas/biomass absorbed oil residue as determined using the equation below:

$$\left[ \frac{X \text{ Mgal fuel oil}}{\text{month}} \times \frac{150 \text{ MMBtu}}{\text{Mgal}} + \frac{Y \text{ MMSCF}}{\text{month}} \times \frac{1,020 \text{ MMBtu}}{\text{MMSCF}} \right] \div \frac{\# \text{ hrs}}{\text{month}} < 250 \text{ MMBtu/hr}$$

Where: X = Thousand gallons of fuel oil combusted in the preceding 12 months.  
Y = Million standard cubic feet of natural gas combusted in preceding 12 months.

**Monitoring/ Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- d. The monitoring, recordkeeping, and reporting requirements for demonstrating compliance given in section 2.1 C.6.e through 2.1 C.6.g and 2.1 C.6.j above are deemed sufficient to demonstrate compliance with 15A NCAC 02D .0530. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the required monitoring and recordkeeping are not conducted as specified in Sections 2.1 C.6.e through 2.1 C.6.g and 2.1 C.6.j above.

#### D. Wood Yard

**KMW Screens (ID No. ES-CW-1-1) Controlled by a Simple Cyclone (95 inches in diameter) (ID No. CD-CW-1-1); and**

**Truck dump and railcar roll-over dump (ID No. ES-CW-4-1) Controlled by a Simple Cyclone (72 inches in diameter) (ID No. CD-CW-4-1)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	$E = 4.10 \times P^{0.67}$  Where: E = allowable emission rate in pound per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible Emissions	Visible emissions shall not be more than 20 percent opacity when averaged over a six-minute period except that six-minute periods averaging not more than 87 percent opacity may occur not more than once in any hour nor more than four times in any 24-hour period	15A NCAC 02D .0521

#### 1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from each source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

##### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

##### **Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from each source shall be controlled by the cyclone. To ensure compliance, the Permittee shall perform inspections and maintenance on the cyclones; as a minimum, the inspection and maintenance requirement shall include the following:
- a monthly visual inspection (for each calendar month, not to exceed 6 weeks from the previous inspection) of the system ductwork and material collection unit for leaks; and
  - an annual inspection (for each calendar year not to exceed 14 months from the previous inspection) of each cyclone's structural integrity.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and cyclones are not inspected and maintained.
- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
  - the results of each inspection;
  - the results of any maintenance performed on the cyclones; and
  - any variance from manufacturer's recommendations, if any, and corrections made.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the records are not maintained as specified in Section 2.1 D.1.d.

##### **Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the cyclones within 30 days of a written request by the DAQ.



- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## **2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from each source shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 D.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

### **Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of each source for any visible emissions above normal. If the emission source(s) are not operating, a record of this fact along with the corresponding date and time shall substitute for the monthly observation. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from any source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 D.2.a above.

If the above-normal emissions are not corrected per (i) above or if the demonstration in (ii) above cannot be made, the Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521.

### **Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the records are maintained as specified in Section 2.1 D.2.d.

### **Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**E. The large batch digester system consisting of five (5) large batch digesters with associated blow tank, filtrate flash tank, and turpentine condensing systems (ID No. ES-LBD)**

**controlled by the LVHC NCG Collection System routed to the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Total Reduced Sulfur (TRS)	5 ppm by volume on a dry basis	15A NCAC 02D .0528
HAP Emissions	See Permit Condition 2.2 A	15A NCAC 02D .1111 (40 CFR Part 63 Subpart S - MACT)

**1. 15A NCAC 02D .0528: TOTAL REDUCED SULFUR FROM KRAFT PULP MILLS**

- a. The emissions of total reduced sulfur shall not exceed five parts per million from any digester system, measured as hydrogen sulfide on a dry gas basis and averaged per discrete contiguous 12-hour time period. [15A NCAC 02D .0528]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 E.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0528.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The digester system emission sources, shall comply with the limitation above by ensuring the following:
- The gases are combusted in the No. 2 Power Boiler; or
  - The gases are combusted in the No. 5 Power Boiler.
- d. The Permittee shall follow the closed vent inspection procedures per Specific Condition 2.2 A to ensure that the emissions are routed to either the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5) as specified above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0528 if these procedures are not followed.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**F. The K1 fiber line Digester System (ID No ES-K1) consisting of:**

**One Kamyr continuous digester with associated steaming vessel, blow tank, filtrate flash tank, and dedicated turpentine condensing system;  
Controlled by the LVHC NCG Collection System routed to the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Total Reduced Sulfur (TRS)	5 ppm by volume on a dry basis, corrected to 10 percent oxygen	15A NCAC 02D .0524 (40 CFR Part 60 Subpart BB)
HAP Emissions	See Permit Condition 2.2 A	15A NCAC 02D .1111 (40 CFR Part 63 Subpart S - MACT)

**1. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions." [15A NCAC 02D .0524]

**Emissions Limitations** [15A NCAC 02D .0524]

- b. No owner or operator shall cause to be discharged into the atmosphere any gases which contain TRS in excess of 5 ppm by volume measured as hydrogen sulfide on a dry basis, corrected to 10 percent oxygen, unless the gases are combusted with other waste gases in an incinerator or other device, and are subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second. [40 CFR Part 60, Subpart 60.283(a)(1)]

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall follow the closed vent inspection procedures per Specific Condition 2.2 A to ensure that the emissions are routed to either the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5) as specified above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if these procedures are not followed.

**Reporting/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**G. The No. 1 and No. 6 Condensate Steam Strippers (ID Nos. ES-ZG008 and ES-ZG0081) Controlled by the LVHC NCG Collection System routed to the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Total Reduced Sulfur (TRS)	5 ppm by volume on a dry basis, corrected to 10 percent oxygen	15A NCAC 02D .0524 (40 CFR Part 60 Subpart BB)
HAP Emissions	See Permit Condition 2.2 A	15A NCAC 02D .1111 (40 CFR Part 63 Subpart S - MACT)

**1. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB**

- a. For the emission source above, the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions." [15A NCAC 02D .0524]

**Emissions Limitations** [15A NCAC 02D .0524]

- b. No owner or operator shall cause to be discharged into the atmosphere any gases which contain TRS in excess of 5 ppm by volume measured as hydrogen sulfide on a dry basis, corrected to 10 percent oxygen, unless the gases are combusted with other waste gases in an incinerator or other device, and are subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second. [40 CFR Part 60, Subpart 60.283(a)(1)]

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall follow the closed vent inspection procedures per Specific Condition 2.2 A to ensure that the emissions are routed to either the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5) as specified above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if these procedures are not followed.

**Reporting/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**H. Evaporator Set No. 6 (ID No. ES-EVAP6) Controlled by the NCG Collection System routed to No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Total Reduced Sulfur (TRS)	5 ppm by volume on a dry basis, corrected to 10 percent oxygen	15A NCAC 02D .0524 (40 CFR Part 60 Subpart BB)
HAP Emissions	See Permit Condition 2.2 A	15A NCAC 02D .1111 (40 CFR Part 63 Subpart S - MACT)

**1. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB**

- a. For the emission source (ID No. ES-EVAP6), the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions." [15A NCAC 02D .0524]

**Emissions Limitations** [15A NCAC 02D .0524]

- b. For the emission source (ID No. ES-EVAP6), no owner or operator shall cause to be discharged into the atmosphere any gases which contain TRS in excess of 5 ppm by volume measured as hydrogen sulfide on a dry basis, corrected to 10 percent oxygen, unless the gases are combusted with other waste gases in an incinerator or other device, and are subjected to a minimum temperature of 650 °C (1200 °F) for at least 0.5 second [40 CFR Part 60, Subpart 60.283(a)(1)].

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall follow the closed vent inspection procedures per Specific Condition 2.2 A to ensure that the emissions are routed to either the No. 2 Power Boiler (ID No. ES-PB2) or No. 5 Power Boiler (ID No. ES-PB5) as specified above. The Permittee shall be deemed in noncompliance with 02D .0524 if these procedures are not followed.

**Reporting/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions.
- e. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## I. Reserved

### J. Recovery Boiler No. 5 (ID No. ES-RB5) – Black liquor solids/No. 2 fuel oil/Ultra-low sulfur No. 2 fuel oil/No. 4 equivalent used oil/ No. 6 fuel oil/Natural gas (nominal 7.39 million pounds of black liquor solids per day average/nominal 140 million Btu per hour heat input rate from firing fuel oil/254 million Btu per hour heat input rate from firing natural gas) with natural gas-fired ignitors, Controlled by the Electrostatic Precipitator (ID No. CD-5RB-ESP)

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	3.0 pounds per equivalent tons of air dried pulp	15A NCAC 02D .0508
Sulfur Dioxide	2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Particulate Matter	0.10 g/dscm (0.044gr/dscf) corrected 8 percent oxygen	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Total Reduced Sulfur (TRS)	5 ppm by volume on a dry basis, corrected to 10 percent oxygen	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Visible Emissions	Visible emissions shall not be more than 35 percent opacity	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Fossil Fuel	10% fossil fuel annual capacity factor	15A NCAC 02Q. 0317 (Avoidance of NSPS)
Sulfur Dioxide	979.2 pounds per hour	15A NCAC 02D .0530
Nitrogen Oxides	100 ppmv corrected to 8 percent oxygen (24-hour average)	
Carbon Monoxide	300 ppmv corrected to 8 percent oxygen (24-hour average)	
Volatile Organic Compounds	37 pounds per hour	
HAP Emissions	See Permit Condition 2.2 C	15A NCAC 02D .1111 (40 CFR Part 63 Subpart MM)
-	See Section 2.2 L.1	15A NCAC 02D .0530(u)

#### 1. 15A NCAC 02D .0508: PARTICULATES FROM PULP AND PAPER MILLS

- a. Emissions from the production of pulp and paper that are discharged from this source into the atmosphere shall not exceed 3.0 pounds of particulate matter per equivalent tons of air dried pulp. [15A NCAC 02D .0508(a)]

##### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance General Condition JJ. If the results of this test are above the limit given in Section 2.1 J.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the Recovery Boiler No. 5 (ID No. ES-RB5) for total particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in General Condition JJ. The testing shall be performed once every 5 years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results of two consecutive tests are less than 80 percent of the limit, at which time the testing frequency may return to every 5 years. If the results of this or any test are above the limit given in Section 2.1 J.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508.

##### **Monitoring and Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from the Recovery Boiler No. 5 shall be controlled by the Electrostatic Precipitator (ID No. CD-5RB-ESP). Because stack testing conducted in September 2020 has shown that compliance with applicable

PM limits is achieved, Recovery Boiler No. 5 may continue to operate if one side or one field of the ESP is out of service. When one ESP field is out of service, the throughput of Recovery Boiler No. 5 may not exceed 269 kpph BLS. When one side of the ESP is out of service, the throughput of Recovery Boiler No. 5 may not exceed 179 kpph BLS. The Permittee shall keep records of the amount of time the boiler is operated with one side or one field out of service. To ensure compliance with the particulate matter and opacity standards, the Permittee shall comply with the 40 CFR 63 Subpart MM monitoring and recordkeeping requirements as specified in Section 2.2 C of this permit. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508 if the Recovery Boiler No. 5 throughput exceeds the limits specified above, the records specified above are not maintained, or if the 40 CFR 63 Subpart MM monitoring and recordkeeping requirements specified in Section 2.2 C are not conducted.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from the sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 J.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The maximum sulfur content of any No. 4 or 6 fuel oil received and burned in the boiler shall not exceed 2.3 pounds per million Btu (as SO<sub>2</sub>). No monitoring is required for the combustion of No. 2 fuel oil in this source. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516 if the sulfur content of the fuel oil exceeds this limit.
- d. To ensure compliance, the Permittee shall monitor the sulfur and heat content of the fuel oil by using fuel oil supplier certification per shipment. The results of the fuel oil supplier certifications shall be recorded in a logbook (written or electronic format) on a semi-annual basis and include the following information:
  - i. the name of the fuel oil supplier;
  - ii. the maximum sulfur content of the fuel oil received during the semi-annual period;
  - iii. the average heat content of the fuel received during the semi-annual period;
  - iv. the method used to determine the maximum sulfur and heat content of the fuel oil; and
  - v. the calculation of pounds SO<sub>2</sub> per million Btu.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516 if the fuel oil supplier certifications are not recorded or maintained as specified above.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the fuel oil supplier certifications postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. The Permittee shall submit a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the fuel oil fired during the period.

**3. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions"[15A NCAC 02D .0524]

**Emissions Limitations** [15A NCAC 02D .0524]

- b. Per 40 CFR Part 60, Subpart BB, emissions from the Recovery Boiler (ID No. ES-RB5) shall not exceed:
  - i. 0.10 g/dscm (0.044 gr/dscf) of particulate matter corrected to 8 percent oxygen. [40 CFR Part 60, Subpart 60.282(a)(1)(i)];
  - ii. 35 percent opacity [40 CFR Part 60, Subpart 60.282(a)(1)(ii)]; or
  - iii. 5 ppm of TRS by volume measured as hydrogen sulfide on a dry basis, corrected to 10 percent oxygen based on a 12-hour average [40 CFR Part 60, Subpart 60.283(a)(2) and 60.284(c)].

The standards apply at all times except during periods of startup, shutdown, and malfunction.

**Testing** [15A NCAC 02Q .0508(f)]

- c. Under the provisions of NCGS 143-215.108, the Permittee shall conduct periodic stack testing of the recovery boiler for filterable particulate matter once every 5 years concurrent with the testing required by 40 CFR 63 Subpart MM. If any stack test demonstrates emissions are above the limit given in Section 2.1 J.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from the Recovery Boiler No. 5 (ID No. ES-RB5) shall be controlled by the Electrostatic Precipitator (ID No. CD-5RB-ESP). Because stack testing conducted in September 2020 has shown that compliance with applicable PM limits is achieved, Recovery Boiler No. 5 may continue to operate if one side or one field of the ESP is out of service. When one ESP field is out of service, the throughput of Recovery Boiler No. 5 may not exceed 269 kpph BLS. When one side of the ESP is out of service, the throughput of Recovery Boiler No. 5 may not exceed 179 kpph BLS. The Permittee shall keep records of the amount of time the boiler is operated with one side or one field out of service.
- e. 40 CFR § 60.284(a)(1) - The Permittee shall calibrate, maintain, and operate a continuous monitoring system to monitor and record the opacity of the gases discharged into the atmosphere from any recovery furnace. The span of this system shall be set at 70 percent opacity. The procedures under 60.13 and 40 CFR 60, Appendix B shall be followed for installation, evaluation, and operation of the COMS.
- f. 40 CFR § 60.284(a)(2) - The Permittee shall calibrate, maintain, and operate a continuous monitoring system to monitor and record the concentration of TRS emissions on a dry basis and the percent of oxygen by volume on a dry basis in the gases discharged into the atmosphere. These systems shall be located downstream of the control device(s) and the spans of these continuous monitoring system(s) shall be set:
  - i. At a TRS concentration of 30 ppm for the TRS continuous monitoring system.
  - ii. At 25 percent oxygen for the continuous oxygen monitoring system.

If the monitoring requirements in Sections 2.1 J.3.d through f are not completed, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.

**Reporting** [15A NCAC 02Q .0508(f)]

- g. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions. Periods of excess emissions reported under 40 CFR 60.284(d) are not a violation provided that 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 the excess emissions occur does not exceed 1 percent for TRS emissions or 6 percent for average opacities, and the Director determines that the recovery boiler and air pollution control equipment are maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.
- h. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. The following Best Available Control Technology (BACT) limits shall not be exceeded:

Pollutant	Emission Limits
Sulfur dioxide	979.2 pounds per hour



Nitrogen Oxides	100 ppmv corrected to 8 percent oxygen (24-hour average)
Carbon Monoxide	300 ppmv corrected to 8 percent oxygen (24-hour average)
Volatile Organic Compounds	37 pounds per hour

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ.
- c. The Permittee shall demonstrate compliance with the NO<sub>x</sub> and CO emission limit(s) above by testing the Recovery Boiler (ID No. ES-RB5) for NO<sub>x</sub> and CO accordance with General Condition JJ. Testing shall be completed once every five years, no more than 61 months after the previous test. If the results of this or any test are above the limits given in Section 2.1 J.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The maximum permitted heat input rate to Recovery Boiler No. 5 from fuel oil shall not exceed 557 million Btu per hour (annual average). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the heat input rate of Recovery Boiler No. 5 from fuel oil exceeds 557 million Btu per hour (annual average).
- e. The Permittee shall demonstrate compliance with the heat input rate by using measured fuel heat content (either direct analysis or vendor certifications) and a flow device (i.e., mass flow meters) as approved by the DAQ. If the results of any calculations or estimation (of heat input) indicate that total heat input to the boiler exceeds the limit given in Section 2.1 J.4.d above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.
- f. The Permittee shall maintain heat input calculations, associated measurements, and analytical results. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the calculations, measurements, and analytical results are not maintained as specified above.

**Reporting** [15A NCAC 02Q .0508 (f)]

- g. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the actual average heat input from fuel oil fired in Recovery Boiler No. 5 for the previous 12-month period. All instances of deviations from the requirements of this permit must be clearly identified.

**5. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS**

**for 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS**

- a. Per 15A NCAC 02Q .0317, in order to avoid applicability of 15A NCAC 02D .0524, NSPS Subpart D, the Recovery Boiler No. 5 shall not exceed a 10 percent annual capacity factor for fossil fuel as determined using the equation below:

$$\frac{345,000 \text{ MMBtu}}{\text{yr}} = \frac{X \text{ Mgal fuel oil}}{\text{yr}} \times \frac{150 \text{ MMBtu}}{\text{Mgal}} + \frac{Y \text{ MMSCF}}{\text{yr}} \times \frac{1,020 \text{ MMBtu}}{\text{MMSCF}}$$

Where: X = Thousand gallons of fuel oil combusted in the preceding 12 months.  
Y = Million standard cubic feet of natural gas combusted in preceding 12 months.

- b. **Monitoring/ Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

The Permittee shall maintain records of annual fuel oil and natural gas usage in the No. 5 Recovery Boiler and the results of the calculation in Section 2.1 J.5.a above on site. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if the records are not maintained or if the Permittee exceeds the annual capacity factor limit in Section 2.1 J.5.a above.

**K. Reserved**

**L. No. 5 East and West Smelt Dissolving Tanks (ID Nos. ES-ST5E and ES-ST5W) controlled by two Wet Scrubbers (ID No. CD-5EST-1 and CD-5WST-1), installed one each, respectively**

The following table provides a summary of limits and standards for the emission source(s) described above:

<b>Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulations</b>
Particulate Matter	0.6 pounds per equivalent tons of air dried pulp	15A NCAC 02D .0508
Visible Emissions	20 percent opacity	15A NCAC 02D .0521
Particulate Matter	0.1 g per kg black liquor solids (BLS) (0.2 lb/ton BLS) dry weight	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Total Reduced Sulfur (TRS)	0.016 g per kg BLS (0.033 lb/ton BLS) as H <sub>2</sub> S	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Sulfur Dioxide	6.2 pounds per hour	15A NCAC 02D .0530
HAP Emissions	See Permit Condition 2.2 C	15A NCAC 02D .1111 (40 CFR Part 63 Subpart MM)

**1. 15A NCAC 02D .0508: PARTICULATES FROM PULP AND PAPER MILLS**

- a. Emissions from the production of pulp and paper that are discharged from these sources into the atmosphere shall not exceed 0.6 pounds of particulate matter per equivalent tons of air dried pulp. [15A NCAC 02D .0508(a)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 L.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from the No. 5 East and West Smelt Dissolving Tanks (ID Nos. ES-ST5E and ES-ST5W) shall be controlled by the two wet Scrubbers (ID Nos. CD-5EST-1 and CD-5WST-1), installed one each, respectively. To ensure compliance, the Permittee shall comply with the 40 CFR 63 Subpart MM monitoring and recordkeeping requirements as specified in Section 2.2 C of this permit. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508 if this monitoring is not conducted or the records are not kept.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from the Smelt Dissolving Tanks (ID Nos. ES-ST5E and ES-ST5W) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 L.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [NCAC 02Q .0508(f)]

- c. These emission sources have wet stacks. The monitoring, recordkeeping, and reporting requirements specified in Section 2.2 C.1.h through 2.2 C.1.o of this permit for 40 CFR 63, Subpart MM are deemed sufficient to demonstrate compliance with 15A NCAC 02D .0521. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the monitoring and recordkeeping required by Section 2.2 C.1.h through 2.2 C.1.o is not conducted.

**3. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions"[15A NCAC 02D .0524]

**Emissions Limitations** [15A NCAC 02D .0524]

- b. Per 40 CFR Part 60, Subpart BB, emissions from the Smelt Dissolving Tanks (ID No. ES-ST5E and ES-ST5W) shall not exceed:
- i. 0.1 g particulate matter per kg black liquor solids (BLS) (0.2 lb/ton BLS) dry weight. [40 CFR Part 60, Subpart 60.282(a)(2)]; or
  - ii. 0.016 g TRS per kg BLS (0.033 lb/ton BLS) as H<sub>2</sub>S [40 CFR Part 60, Subpart 60.283(a)(4)].
- The standards apply at all times except during periods of startup, shutdown, and malfunction.

**Testing** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall demonstrate compliance with the emission limit(s) above by testing the No. 5 Smelt Tanks (ID Nos. ES-ST5E and ES-ST5W) for particulate matter and TRS accordance with General Condition JJ. The testing shall be performed once every 5 years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results of two consecutive tests are less than 80 percent of the limit, at which time the testing frequency may return to every 5 years. If the results of this or any test are above the limit given in Section 2.1 L.3.b above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from the No. 5 East and West Smelt Dissolving Tanks (ID Nos. ES-ST5E and ES-ST5W) shall be controlled by the scrubbers (ID Nos. CD-5EST-1 and CD-5WST-1). The Permittee shall install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that monitors and records the fan amperage and the scrubbing liquid flow rate for the Nos. 5E and 5W Smelt Dissolving Tank Scrubbers (ID Nos. CD-5EST-1 and CD-5WST-1). The Permittee shall record the results of these measurements at least once every 15 minutes and calculate 3-hour averages. Scrubber liquid flow and fan amperage shall be consistent with the operating limits for 40 CFR 63 Subpart MM in Section 2.2 C of this permit. These operating parameter limits do not apply during stack testing conducted to establish new operating parameter limits. The Permittee shall be deemed in noncompliance with 02D .0524 if these procedures are not followed or if the records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions.
- f. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. The following Best Available Control Technology (BACT) shall not be exceeded:

Pollutant	Emission Limits
Sulfur dioxide	6.2 pounds per hour

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 L.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/ Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, the Permittee shall follow the 40 CFR 63 Subpart MM monitoring and recordkeeping requirements as specified in Section 2.2 C of this permit.

**M. Lime Slaker No. 3 (ID No. ES-SLK3), Controlled by a Wet Scrubber (ID No. CD-H317); and  
Lime Slaker No. 6 (ID No. ES-H440), Controlled by a Wet Scrubber (ID No. CD-H259)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	$E = 4.10 \times P^{0.67}$  Where: E = allowable emission rate in pound per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible Emissions	<b><u>Affected Source: ID No. ES-SLK3</u></b> 40 percent opacity <b><u>Affected Source: ID No. ES-H440</u></b> 20 percent opacity	15A NCAC 02D .0521
NC Toxics	See Permit Condition 2.2 E - State-Only Requirement	15A NCAC 02D .1100

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from this source shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 M.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from Lime Slaker No. 3 (ID No. ES-SLK3) and Lime Slaker No. 6 (ID No. ES-H440) shall be controlled by the wet scrubbers. The Permittee shall install, operate, and maintain a scrubbing liquid flowmeter on each scrubber. To ensure compliance and the effective operation of the scrubbers, the Permittee shall monitor and record, once per day, scrubbing liquid flow rate. An hourly average may be recorded. The scrubbing liquid flow rate shall be maintained at 35 gpm or above. If the scrubbing liquid flow rate is not at or above 35 gpm, the Permittee shall take appropriate corrective action within the monitoring period to return the flow rate to the appropriate operating range and record the action taken. The Permittee shall be allowed three (3) days of absent observations per semi-annual period. If the emission source(s) is not operating, a record of this fact along with the corresponding date and time shall substitute for the daily observation. The readings shall be recorded in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. To ensure quality, the flow rate gauges or devices shall be calibrated annually (not to exceed 14 months from the previous inspection). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if an out of range scrubbing liquid flow rate is not corrected within the monitoring period or if scrubbing liquid flow rate measurements are not recorded once per day. The Permittee shall be allowed three (3) days of absent observations per semi-annual period without being deemed in noncompliance with 15A NCAC 02D .0516.
- d. The results of the corrective action activities, discussed above for each scrubber, shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative of DAQ upon request. The logbook shall record the following:
- the date and time of each recorded action
  - the results of each corrective action;
  - the causes for any variance from the allowable operating range for each scrubber; and
  - corrective actions taken.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the records are not maintained as specified above.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the scrubbers within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from the Lime Slaker No. 3 (ID No. ES-SLK3) shall not be more than 40 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 40 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 90 percent opacity. [15A NCAC 02D .0521 (c)]
- b. Visible emissions from the Lime Slaker No. 6 (ID No. ES-H440) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 M.2.a or b above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- d. These emission sources have wet stacks. The monitoring, recordkeeping, and reporting requirements specified in Section 2.1 M.1.c and d of this permit are deemed sufficient to demonstrate compliance with 02D .0521. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if the monitoring and recordkeeping requirements are not conducted as specified in Sections 2.1 M.1.c and 2.1 M.1.d above.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- e. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit a summary report of the monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified

**N. Reserved**

**O. Lime Kiln No. 4 (ID No. ES-K4001) No. 6 Fuel Oil/No. 4 Equivalent Used Oil/No. 2 Fuel Oil/Natural Gas-Fired, Controlled by the Electrostatic Precipitator (ID No. CD-K4021) and Venturi Scrubber (ID No. CD-4006)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	0.5 pounds per equivalent tons of air dried pulp	15A NCAC 02D .0508
Sulfur Dioxide	2.3 pound per million Btu heat input	15A NCAC 02D .0516
Particulate Matter	0.13gr/dscf corrected 10 percent oxygen when liquid fuel is being fired, and 0.066 gr/dscf corrected to 10 percent oxygen when gaseous fuel is being fired	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Total Reduced Sulfur (TRS)	8 ppm by volume on a dry basis, corrected to 10 percent oxygen	15A NCAC 02D .0524 (40 CFR 60 Subpart BB)
Nitrogen Oxides	159 tons of NOx per year, and See Permit Condition 2.2 F	15A NCAC 02Q .0317 (15A NCAC 02D .0530 Avoidance)
HAP Emissions, Visible Emissions	See Permit Condition 2.2 C	15A NCAC 02D .1111 (40 CFR Part 63 Subpart MM)

**1. 15A NCAC 02D .0508: PARTICULATES FROM PULP AND PAPER MILLS**

- a. Emissions from the production of pulp and paper that are discharged from this source into the atmosphere shall not exceed 0.5 pounds of particulate matter per equivalent tons of air dried pulp. [15A NCAC 02D .0508(a)].

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance General Condition JJ. If the results of this test are above the limit given in Section 2.1 O.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508.
- c. Under the provisions of NCGS 143-215.108, the Permittee shall demonstrate compliance with the emission limit(s) above by testing the Lime Kiln No. 4 (ID No. ES-K4001) for total particulate matter in accordance with a testing protocol approved by the DAQ. Details of the emissions testing and reporting requirements can be found in General Condition JJ. The testing shall be performed once every 5 years, no more than 61 months after the previous test. If the testing results are greater than or equal to 80 percent of the emission limit above, testing must be conducted each calendar year, no more than 15 months after the previous test, until results of two consecutive tests are less than 80 percent of the limit, at which time the testing frequency may return to every 5 years. If the results of this or any test are above the limit given in Section 2.1 O.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508.

**Monitoring/Recordkeeping**[15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from the lime kiln shall be controlled by the electrostatic precipitator. No. 4 Lime Kiln may be operated while one field of the ESP is down for maintenance and may be operated on natural gas only while three fields of the ESP are down for maintenance. When one field of the ESP is down, No. 4 Lime Kiln throughput shall not exceed 28.33 TCaO/hr. Based on performance testing conducted in February 2018, the Permittee shall keep records of the amount of time that the kiln is operated with one or more fields of the ESP down and the fuel combusted during each period. To ensure compliance, the Permittee shall comply with the 40 CFR 63 Subpart MM monitoring and recordkeeping requirements as specified in Section 2.2 C of this permit. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0508 if the monitoring and recordkeeping requirements of 40 CFR 63 Subpart MM are not conducted as specified in Section 2.2 C below.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## 2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

### **Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 O.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

### **Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The maximum sulfur content of any No. 4 or 6 fuel oil received and burned in the kiln shall not exceed 2.3 pounds per million Btu (as SO<sub>2</sub>). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516 if the sulfur content of the fuel oil exceeds this limit.
- d. To ensure compliance, the Permittee shall monitor the sulfur and heat content of the fuel oil by using fuel oil supplier certification per shipment. The results of the fuel oil supplier certifications shall be recorded in a logbook (written or electronic format) on a semi-annual basis and include the following information:
- the name of the fuel oil supplier;
  - the maximum sulfur content of the fuel oil received during the semi-annual period;
  - the average heat content of the fuel received during the semi-annual period;
  - the method used to determine the maximum sulfur and heat content of the fuel oil; and
  - the calculation of pounds SO<sub>2</sub> per million Btu.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516 if the sulfur content of the oil is not monitored and recorded.
- e. No Monitoring/Recordkeeping/reporting is required from the firing of natural gas in this source for this regulation.

### **Reporting** [15A NCAC 02Q .0508(f)]

- f. The Permittee shall submit a summary report of the fuel oil supplier certifications postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. The Permittee shall submit a certified statement signed by the responsible official that the records of fuel oil supplier certification submitted represent all of the fuel oil fired during the period.

## 3. 15A NCAC 02D .0524: NSPS 40 CFR 60 SUBPART BB

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart BB, including Subpart A "General Provisions." [15A NCAC 02D .0524]

### **Emissions Limitations** [15A NCAC 02D .0524]

- b. Per 40 CFR Part 60, Subpart BB, emissions from the Lime Kiln No. 4 shall not exceed:
- 0.13 gr/dscf of particulate matter corrected to 10 percent oxygen when burning only liquid fuel or 0.066 gr/dscf corrected to 10 percent oxygen when burning gaseous fuel. [40 CFR Part 60, Subpart 60.282(a)(3)(i)] or
  - 8 ppm of TRS by volume on a dry basis, corrected to 10 percent oxygen based on a 12-hour average [40 CFR Part 60, Subpart 60.283(a)(5) and 60.284(c)].

The standards apply at all times except during periods of startup, shutdown, and malfunction.

### **Testing** [15A NCAC 02Q .0508(f)]

- c. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 O. 3. a. above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524.

### **Monitoring and Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. Particulate matter emissions from Lime Kiln No. 4 shall be controlled by the Electrostatic Precipitator. No. 4 Lime

Kiln may be operated while one field of the ESP is down for maintenance and may be operated on natural gas only while three fields of the ESP are down for maintenance. When one field of the ESP is down, No. 4 Lime Kiln throughput shall not exceed 28.33 TCaO/hr. Based on performance testing conducted in February 2018, the Permittee shall keep records of the amount of time that the kiln is operated with one or more fields of the ESP down and the fuel combusted during each period. To ensure compliance with the PM limit in 2.1 O.4.b. above, the Permittee must install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) at the outlet of No. 4 Lime Kiln ESP (ID No. CD-K4021) in accordance with Performance Specification 1 in Appendix B to 40 CFR 60. The span of the COMS must be set at 70 percent opacity. The COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period and each 6-minute average must be calculated as the average of 36 or more data points, equally spaced over each 6-minute period. Corrective action shall be taken when a 6-minute average opacity is greater than 20 percent. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if these parameters are not monitored or these records are not maintained or if opacity exceeds 20 percent for 1 percent or more of the operating time in a semi-annual period (excluding periods of startup, shutdown, or malfunction).

- e. 40 CFR § 60.284(a)(2) – The Permittee shall calibrate, maintain, and operate a continuous monitoring system to monitor and record the concentration of TRS emissions on a dry basis and the percent of oxygen by volume on a dry basis in the gases discharged into the atmosphere. These systems shall be located downstream of the control device(s) and the spans of these continuous monitoring system(s) shall be set:

- i. At a TRS concentration of 30 ppm for the TRS continuous monitoring system.
- ii. At 25 percent oxygen for the continuous oxygen monitoring system.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0524 if a continuous monitoring system is not operated or if the concentration of TRS emissions or the percent of oxygen is not recorded as specified above.

**Reporting** [15A NCAC 02Q .0508(f)]

- f. The Permittee shall follow the requirements of 40 CFR § 60.284(d) for reporting of excess emissions.
- g. The Permittee shall submit a summary report of the monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**4. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 02D .0530 for major sources and major modifications, Lime Kiln No. 4 shall discharge into the atmosphere less than 159 tons of NO<sub>x</sub> per consecutive 12-month period.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.1 O.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, the Permittee shall record and maintain records of monthly NO<sub>x</sub> emissions from Lime Kiln No. 4 and calculate rolling 12-month total NO<sub>x</sub> emissions. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the monthly NO<sub>x</sub> emissions are not recorded.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit a summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities and postmarked on or before January 30 of each calendar year for the preceding 6-month period between July and December, and July 30 of each calendar year for the preceding 6-month period between January and June. The report shall contain the following:
  - i. The monthly NO<sub>x</sub> emissions for the previous 17 months. The total NO<sub>x</sub> emissions must be calculated for each of the 12-month periods over the previous 17-months; and
  - ii. All instances of deviations from the requirements of this permit must be clearly identified.



**P. Lime Handling Systems Consisting of:**

**Reburnt Lime Handling System (enclosed belt conveyor and bucket elevator) (ID No. ES-LH-Reburnt) and Reburnt Lime Silos No. 1 and No. 2 (ID Nos. ES-RLS-1 and ES-RLS2) controlled by a bagfilter (ID No. CD-H367); and**

**Fresh Lime Silo (ID No. ES-H-84) controlled by a bagfilter (ID No. CD-H85)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	$E = 4.10 \times P^{0.67}$ , for process rates $\leq 30$ tons per hour, OR $E = 55 \times P^{0.11} - 40$ , for process rates $> 30$ tons per hour Where: E = allowable emission rate in pounds per hour P = process weight in tons per hour	15A NCAC 02D .0515
Visible Emissions	20 percent opacity	15A NCAC 02D .0521

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad (\text{for process rates less than or equal to 30 tons per hour}), \text{ or}$$

$$E = 55.0 \times P^{0.11} - 40 \quad (\text{for process rates greater than 30 tons per hour})$$

Where E = allowable emission rate in pounds per hour  
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 P.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from these sources shall be controlled by the bagfilters. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- a monthly visual inspection (for each calendar month, not to exceed 6 weeks from the previous inspection) of the system ductwork and material collection unit for leaks; and
  - an annual internal inspection (not to exceed 14 months from the previous inspection) of the bagfilters' structural integrity.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilters are not inspected and maintained.
- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
  - the results of each inspection;
  - the results of any maintenance performed on the bagfilter(s); and
  - any variance from manufacturer's recommendations, if any, and corrections made.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the records are not maintained as specified above.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 P.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of the sources for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If the emission source(s) are not operating, a record of this fact along with the corresponding date and time shall substitute for the monthly observation. If visible emissions from any source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 P.2.a above.The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the required monthly observations are not conducted as required; if the above-normal emissions are not corrected within the monitoring period or the percent opacity demonstration cannot be made.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**Q. Reserved**

**R. No. 18 Pulp Dryer (ID Nos. ES-JJ-030), uncontrolled**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
NC Toxics	See Permit Condition 2.2 E - State-Only Requirement	15A NCAC 02D .1100

**S. Water Treatment Filter Plant Fresh Lime Bin (ID No. ES-V-139) controlled by a bagfilter (ID No. CD-V-142)**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Particulate Matter	$E = 4.10 \times P^{0.67}$  Where: E = allowable emission rate in pound per hour P = process weight rate in tons per hour	15A NCAC 02D .0515
Visible Emissions	20 percent opacity	15A NCAC 02D .0521

**1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES**

- a. Emissions of particulate matter from these sources shall not exceed an allowable emission rate as calculated by the following equation: [15A NCAC 02D .0515(a)]

$$E = 4.10 \times P^{0.67} \quad \text{Where } E = \text{allowable emission rate in pounds per hour}$$

$$P = \text{process weight in tons per hour}$$

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 S.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. Particulate matter emissions from the source shall be controlled by the bagfilter. To ensure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there are no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
- a monthly visual inspection (for each calendar month, not to exceed 6 weeks from the previous inspection) of the system ductwork and material collection unit for leaks; and
  - an annual internal inspection (not to exceed 14 months from the previous inspection) of the bagfilter's structural integrity.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if the ductwork and bagfilter is not inspected and maintained.
- d. The results of inspection and maintenance shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
- the date and time of each recorded action;
  - the results of each inspection;
  - the results of any maintenance performed on the bagfilter; and
  - any variance from manufacturer's recommendations, if any, and corrections made.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0515 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit the results of any maintenance performed on the bagfilter within 30 days of a written request by the DAQ.
- f. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

**2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from these sources shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521(d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 S.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring** [15A NCAC 02Q .0508(f)]

- c. To ensure compliance, once a month the Permittee shall observe the emission points of the sources for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If the emission source(s) are not operating, a record of this fact along with the corresponding date and time shall substitute for the monthly observation. If visible emissions from any source are observed to be above normal, the Permittee shall either:
  - i. take appropriate action to correct the above-normal emissions within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
  - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2610 (Method 9) for 12 minutes is below the limit given in Section 2.1 S.2.a above.The Permittee shall be deemed to be in noncompliance with 15A NCAC 02D .0521 if the required monthly observations are not conducted as required; if the above-normal emissions are not corrected within the monitoring period or the percent opacity demonstration cannot be made.

**Recordkeeping** [15A NCAC 02Q .0508(f)]

- d. The results of the monitoring shall be maintained in a logbook (written or electronic format) on-site and made available to an authorized representative upon request. The logbook shall record the following:
  - i. the date and time of each recorded action;
  - ii. the results of each observation and/or test noting those sources with emissions that were observed to be above normal along with any corrective actions taken to reduce visible emissions; and
  - iii. the results of any corrective actions performed.

The Permittee shall be deemed in noncompliance with 02D .0508 if the records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

## **T. Temporary Package Boilers (ID Nos. ES-PKB-1 and ES-PKB-2) - No. 2 fuel oil/natural gas-fired, heat input between 10 and 100 million Btu per hour each**

The following table provides a summary of limits and standards for the emission source(s) described above:

<b>Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulations</b>
Particulate Matter	0.16 pounds per million Btu	15A NCAC 02D .0503
Visible Emissions	20 percent opacity	15A NCAC 02D .0521
Sulfur Dioxide	2.3 pounds per million Btu	15A NCAC 02D .0516
PSD compounds	See Permit Condition 2.1 T.4	15A NCAC 02Q .0317 15A NCAC 02D .0530 Avoidance
Fuel Oil	See Permit Condition 2.1 T.5	15A NCAC 02Q .0317 15A NCAC 02D .0524 Avoidance
HAPs	See Permit Condition 2.1 T.6	15A NCAC 02Q .0317 MACT Avoidance
NC Toxics	See Permit Condition 2.2 E - State-Only Requirement	15A NCAC 02D .1100

### **1. 15A NCAC 02D .0503: PARTICULATES FROM FUEL BURNING INDIRECT HEAT EXCHANGERS**

- a. Emissions of particulate matter from the combustion of natural gas/No. 2 fuel oil that are discharged from these sources into the atmosphere shall not exceed 0.16 pound per million Btu heat input. [15A NCAC 02D .0503(c)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 T.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0503.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring/recordkeeping/reporting is required to demonstrate compliance with this standard for combustion of natural gas or No. 2 fuel oil by these sources

### **2. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS**

- a. Visible emissions from the sources (ID Nos. ES-PKB-1 and ES-PKB-2) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emission testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 T.2.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0521.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring, recordkeeping, or reporting is required for visible emissions when firing natural gas or No. 2 fuel oil in the sources (ID Nos. ES-PKB-1 and ES-PKB-2).

### **3. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES**

- a. Emissions of sulfur dioxide from these sources shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

**Testing** [15A NCAC 02D .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 T.3.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0516.

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0508(f)]

- c. No monitoring, recordkeeping, or reporting is required for the combustion of No. 2 fuel oil or natural gas in these sources.

**4. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 02D .0530, emissions from the boilers (ID Nos. ES-PKB-1 and ES-PKB-2) shall be less than the following per consecutive 12-month period: [15A NCAC 02D .0530]

Pollutant	Emission Limit (tons)
particulate (TSP)	33.34
PM10	23.34
sulfur dioxide	134.11
volatile organic compounds	40.85
carbon monoxide	115.07
nitrogen oxides	201.22
fluorides	3.11
sulfuric acid mist	21.68
lead	0.61

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emission testing is required, the Permittee shall perform such testing in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.1 T.4.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall monitor and record on a monthly basis the PSD compound emissions, the amount of fuel oil and natural gas burned, and the sulfur content of fuel oil including certification of the fuel, for each boiler in a logbook (written or in electronic format). The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit a semi-annual summary report, acceptable to the Regional Air Quality Supervisor, of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December, and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
- The monthly PSD compound emissions for the previous 17 months from the temporary package boilers (ID Nos. ES-PKB-1 and ES-PKB-2). The total emissions must be calculated for each of the 12-month periods over the previous 17 months;
  - The monthly quantities of natural gas and No. 2 fuel oil consumed in these units for the previous 17 months; and
  - The average sulfur content of the No. 2 fuel oil.
- All instances of deviations from the requirements of this permit must be clearly identified.

**5. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .0524: NEW SOURCE PERFORMANCE STANDARDS**

- a. In order to avoid the applicability of 15A NCAC 02D .0524, the boilers (ID Nos. ES-PKB-1 and ES-PKB-2) shall combust distillate oil with a potential SO<sub>2</sub> emission rate no greater than 0.060 pounds per million Btu, be capable of being moved from one location to another, and remain onsite for no longer than 180 consecutive days as defined in §60.41c. The Permittee shall notify the Regional Office in writing within 10 days of exceeding the 180 day period.

**6. 15A NCAC 02Q .0317: AVOIDANCE CONDITIONS for  
15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY**

- a. In order to avoid the requirements of 15A NCAC 02D .1111 and 40 CFR Part 63, Subpart DDDDD, the Temporary Package Boilers (**ID Nos. ES-PKB-1 and ES-PKB-2**) shall meet the definition of "temporary boiler" as defined in 40 CFR 63.7575:
- i. the temporary boiler shall be capable of being moved from one location to another;
  - ii. the temporary boiler shall not be attached to a foundation;
  - iii. the temporary boiler (or any replacement for the temporary boiler) shall not perform the same (or similar) function for more than 12 consecutive months unless NCDAQ approves an extension; and
  - iv. the temporary boiler shall not be moved from one location to another within the facility but continues to perform the same or similar function in an attempt to circumvent the residence time requirements of this definition.

If any temporary boiler does not meet the definition above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Monitoring/Recordkeeping** [15A NCAC 02Q .0508(f)]

- b. The Permittee shall maintain records of the dates that any temporary boiler is installed on-site and the dates that any temporary boilers are removed from the plant site. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these records are not created and retained as required above.

**Notifications and Reports** [15A NCAC 02Q .0508(f)]

- c. **Initial Notification.** Within 15 days of installing any temporary and/or back-up boiler at the facility, the Permittee shall submit a written notification to the Regional Supervisor, DAQ. The notification shall indicate that actual date of the boiler installation, or where the notification is provided prior to such date, the anticipated date of boiler installation. Additionally, the report must contain the following information: [40 CFR 63.7550(a) and (c)]
- i. Company name and address;
  - ii. Process unit information
  - iii. Date of report and beginning and ending dates of the reporting period;
  - iv. The total operating time during the reporting period.

## 2.2 Multiple Emission Source(s) Specific Limitations and Conditions

### A. 40 CFR 63, Subpart S - MACT Affected Sources:

Source ID No.	Source Description	Control ID No	Control Description
<b>Bleaching System Sources</b>			
ES-BP1	Bleach Plant No. 1	CD BP-SCRB (stages where chlorinated compounds are introduced)	Wet scrubber with scrubber injection (via closed-vent collection system)
ES-BP2	Bleach Plant No. 2		
ES-BP3	Bleach Plant No. 3		

Source ID No.	Source Description	Control ID No	Control Description
<b>LVHC System Sources</b>			
ES-WELL4	No. 4 Hotwell - 40 CFR Part 63.443(a)(1)(i)	ES-PB2	No. 2 Power Boiler via LVHC NCG Collection System
ES-EVAP6	No. 6 Evaporator System - 40 CFR Part 63.443(a)(1)(i)	or	or
ES-CSFT1	No. 1 Condensate Steam Stripper Feed Tank - 40 CFR 63.443(a)(1)(i)	ES-PB5	No. 5 Power Boiler via LVHC NCG Collection System
ES-ZG008	No. 1 Condensate Steam Stripper Off Gases (SOG) 40CFR 63.443(a)(1)(i)		
ES-CSFT6	No. 6 Condensate Steam Stripper Feed Tank - 40 CFR 63.443(a)(1)(i)		
ES-ZG0081	No. 6 Condensate Steam SOG (No. 6 Set) - 40 CFR Part 63.443(a)(1)(i)		
ES-LUND	Lundberg Turpentine System - 40 CFR Part 63.443(a)(1)(i)		
ES-GOSL	Goslin Turpentine System - 40 CFR Part 63.443(a)(1)(i)		
ES-TCS	Turpentine Recovery/Condensing Systems - 40 CFR Part 63.443(a)(1)(i)		
ES-K1	K1 Fiber Line - 40 CFR Part 63.443(a)(1)(i)		
ES-LBD	Large Batch Digester System - 40 CFR Part 63.443(a)(1)(i)		



**A. 40 CFR 63, Subpart S – MACT Affected Sources (continued):**  
***[Sources not covered by 40 CFR 63.447 Clean Condensate Alternative]:***

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>HVLC System Sources*</b>			
All facility knotters	Knotter system**	NA	NA
All facility screens	Screen systems**		
All facility deckers	Deckers***		

\* High volume, low concentration or HVLC system means the collection of equipment including the pulp washing and any other equipment serving the same function as those previously listed. See 2.2 B for alternative control requirements for HVLC sources under the Clean Condensate Alternative approach.

\*\* These sources are not subject to the HVLC control requirements under 63.443(c) and (d) as total HAP emissions from the knotter and screen systems (measured as methanol) are less than 0.3 lbs per ton of oven dry pulp.

\*\*\* These sources are not subject to the HVLC control requirements under 63.443(c) and (d) as the deckers use process water with a total HAP concentration less than 400 ppmw (measured as methanol).

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>Pulping Condensates Collection System Sources</b>			
ES-WELL4 [Stream ID No. COND-1]	No. 4 Hotwell - 40 CFR Part 63.446(b)(3)	ES-ZG008 or ES-ZG0081	No. 1 condensate stripper or No. 6 condensate stripper
ES-EVAP6 [Stream ID No. COND-3]	No. 6 Evaporator Hotwell - 40 CFR Part 63.446(b)(3)		
[Stream ID No. COND-4]	Batch Digester BHA Primary and Secondary Condenser Condensate 40 CFR Part 63.446(b)(1)	ES-PB2  or ES-PB5	Routed to:  No. 2 Power Boiler via LVHC NCG Collection System  or  No. 5 Power Boiler via LVHC NCG Collection System
[Stream ID No. COND-5]	LVHC Low Point Drain Condensate 40 CFR Part 63.446(b)(5)		
[Stream ID No. COND-6]	Batch and Continuous Turpentine Underflow		
[Stream ID No. COND-7]	Kamyr First Pass Condenser Condensate		

**A. 40 CFR 63, Subpart S - MACT Affected Sources (continued):**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Hazardous Air Pollutants	<p><b><u>Bleaching System</u></b> 10 ppmv total chlorinated HAP, 0.002 lb chlorinated HAP/ODTP, or 99 percent reduction by weight</p> <p><b><u>LVHC System</u></b> Route system vents to No. 2 or No. 5 Power Boiler</p> <p><b><u>HVLC System</u></b> See 2.2 B</p> <p><b><u>Pulping Condensate Collection</u></b> Collect a minimum 11.1 pounds per ton ODP followed by treatment in the No. 1 Condensate Stripper (ID No. ES-ZG008) or the No. 6 Condensate Stripper (ID No. ES-ZG0081) meeting: 92 percent HAP removal, or 10.2 pounds per ton ODP removal</p>	15 A NCAC 02D .1111 (40 CFR 63 Subpart S - MACT)

**1. 15A NCAC 02D .1111: MACT 40 CFR 63 SUBPART S**

- a. The Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63 Subpart S, including Subpart A "General Provisions" as defined per 63.440(g) and indicated per Table 1 of Subpart S. These emission standards shall apply at all times except as otherwise specified in 40 CFR Part 63, Subpart S. Terms used throughout this section are defined in the Clean Air Act as amended in 1990 and in 40 CFR 63.2 and 63.441. Units and abbreviations are defined in 40 CFR 63.3 [15A NCAC 02D .1111]

**Emission Limitations** [15A NCAC 02D .1111]

**Standards for the Bleaching System** [40 CFR 63.445]

- b. The Permittee shall meet the following control requirements for bleaching systems using chlorinated compounds [40 CFR 63, Subpart 63.445]:
  - i. The equipment at each bleaching stage of the bleaching systems, where chlorinated compounds are introduced shall be enclosed and vented into a closed vent system meeting the requirements specified in 40 CFR 63.450 and introduced into the Bleach Plant Scrubber (ID No. CD-BP-SCRB);
  - ii. The scrubber (ID No. CD BP-SCRB) shall achieve a treatment device outlet concentration of 10 ppmv or less of total chlorinated HAP or 0.002 lb chlorinated HAP/ODTP or achieve a 99 percent reduction by weight; and
  - iii. The Permittee shall not use hypochlorite or chlorine for bleaching in the bleaching systems listed above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the standards for the bleaching system in Section 2.2 A.1.b above are not met.

**Standards for the LVHC pulping systems at kraft processes** [40 CFR 63.443(a)]

- c. The Permittee shall meet the following control requirements for the total HAP emissions from the LVHC system [40 CFR 63.443]:
  - i. Each LVHC system component shall be enclosed and vented into a closed vent system meeting the requirements of 40 CFR 63.450, and routed to:
    - (A) The No. 2 Power Boiler (ID No. ES-PB2) [heat input capacity greater than 150 million Btu per hour] by introducing the HAP emission stream with the combustion air/primary fuel/into the flame zone; or

- (B) The No. 5 Power Boiler (ID No. ES-PB5) [heat input capacity greater than 150 million Btu per hour] by introducing the HAP emission stream with the combustion air/primary fuel/into the flame zone.
- d. Periods of excess emissions reported under Sec. 63.455 shall not be a violation of Sec. 63.443 (c) and (d) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:
- One percent for control devices used to reduce the total HAP emissions from the LVHC system; and
  - Four percent for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the standards for the LVHC pulping systems in Sections 2.2 A.1.c and 2.2 A.1.d above are not met.

**Standards for Kraft pulping process condensates** [40 CFR 63.446]

- e. The pulping process condensates as identified per 40 CFR 63.446(b) shall be conveyed in a closed collection system that is designed and operated to meet the following requirements:
- Each closed collection system shall meet the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962, except for closed vent systems;
  - Closed vent systems shall be designed and operated in accordance with 40 CFR 63.450;
  - The process condensate streams collected in total shall contain a minimum of 11.1 pounds of HAP per ton of oven dried pulp produced (based on a 15-day rolling average, as requested by the Permittee);
  - Any condensate tank shall meet the requirements per 40 CFR 63.446(d)(2); and
  - The pulping process condensates collected shall be treated by the No. 1 Condensate Stripper (ID No. ES-ZG008) or the No. 6 Condensate Stripper (ID No. ES-ZG0081) which shall:
    - Reduce or destroy the total HAPs by at least 92 percent or more by weight; or
    - Remove a minimum of 10.2 pounds per ton of oven dried pulp (ODP); and
  - For each steam stripper system used to comply with the requirements specified in paragraph 63.446(e)(3), periods of excess emissions reported under Sec. 63.455 shall not be a violation of paragraphs 63.446(d), (e), and (f) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed 10 percent

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the standards for the Kraft pulping process condensates in Section 2.2 A.1.e above are not met.

**Testing** [15A NCAC 02Q .0508(f), 15A NCAC 02D .1111]

- f. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. The Permittee shall conduct a performance test on the Bleach Plant Scrubber (ID No. CD-BP-SCRB) at least once every 60 months in accordance with 40 CFR 63.457 and General Condition JJ. If the results of this test are above the limits given in Section 2.2 A.1.b through e above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Monitoring for the Bleaching System Scrubber** [15A NCAC 02Q .0508(f), 40 CFR 63.453]

- g. The Permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS), on the Bleach Plant Scrubber (ID No. CD-BP-SCRB). The CMS shall include a continuous recorder. The CMS shall be operated to ensure the following operational parameters are maintained [40 CFR 63, Subpart 63.453]:
- The minimum pH in the scrubber return line to the recirculation tank shall be 11.8 (3 hour average);
  - The scrubber inlet vent gas fan operating status of "on" ("on" or "off" based on motor load); and
  - The minimum scrubber liquid recirculation rate shall be 130 gallons per minute (3 hour average).
- If any monitoring parameter values are exceeded or if the monitoring procedures are not followed, the Permittee shall be deemed in noncompliance with 02D .1111.

**Monitoring for the LVHC pulping systems Control Devices** [15A NCAC 02Q .0508(f), 40 CFR 63.453]

- h. No control device parameter monitoring is required for pulping vent systems routed to the No. 2 Power Boiler (ID No. ES-PB2) or the No. 5 Power Boiler (ID No. ES-PB5). [40 CFR 63.453]

**Monitoring for the pulping process condensates** [15A NCAC 02Q .0508(f), 40 CFR 63.453]

- i. **Condensate Collection:**

The Permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS) to monitor condensate stream collection. The CMS shall include a continuous recorder. The CMS shall be operated to ensure that the minimum of 11.1 pounds of HAP per ton of oven dried pulp

produced (based on a 15-day rolling average, as requested by the Permittee) is collected. The HAP content for each stream shall be validated on a weekly basis by performing daily stripper feed tank sampling (excluding weekends and holidays). [40 CFR 60, Subpart 63.453].

If any monitoring parameter demonstrates collection less than 11.1 pounds per oven dried pulp, the Permittee shall be deemed in noncompliance with 02D .1111.

The Permittee can provide long term sampling data to the agency in order to establish an emission factor for methanol that would allow for revising the monitoring frequency from weekly to monthly. Upon Department approval of Permittee's request, validation frequency may be increased from weekly to monthly.

**Monitoring for the pulping process condensates** [15A NCAC 02Q .0508(f), 40 CFR 63.453]

j. **No. 1 Condensate Stripper (ID No. ES-ZG008) and the No. 6 Condensate Stripper (ID No. ES-ZG0081):**

The Permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS) on the No. 1 Condensate Stripper (ID No. ES-ZG008) and the No. 6 Condensate Stripper (ID No. ES-ZG0081). The CMS shall include a continuous recorder. The CMS shall be operated to ensure the following operational parameters are maintained. [40 CFR 63.453]

The Effective Steam Ratio (ESR) shall be maintained above 17 percent for the No. 1 Condensate Stripper (ID No. ES-ZG008) and above 16.5 percent for the No. 6 Condensate Stripper (ID No. ES-ZG0081) as defined by the following equation:

$$ESR (\%) = (((FS (KPPH) * 1000) - (CF (GPM) * 8.34 \text{ lb/gal} * 60 \text{ mins/hr} * (T1(\text{degrees F}) - T2(\text{degrees F}))/1000)) / (CF (GPM) * 8.34 \text{ lb/gal} * 60)) * 100$$

where:

ESR = Effective Steam Ratio (percent)

FS = Feed Steam in KPPH (thousand pounds per hour)

CF = Condensate Flow in GPM (gallons per minute)

T1 = the stripper bottom temperature in degrees F, and

T2 = the condensate feed temperature in degrees F

If any monitoring parameter values are exceeded, the Permittee shall be deemed in noncompliance with 02D .1111.

**Monitoring for Enclosures and Closed Vent Systems** [15A NCAC 02Q .0508(f), 40 CFR 63.453]

- k. Each enclosure and closed vent system shall meet the monitoring requirements of 40 CFR 63.453. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the monitoring requirements of 40 CFR 63.453 are not met.

**Startup, Shutdown, and Malfunction** [15A NCAC 02D .1111 and 40 CFR 63.453]

- l. The Permittee shall operate and maintain the Subpart S affected sources at all times, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to DAQ which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these practices are not conducted. [40 CFR 63.453(q)]

**Recordkeeping/Reporting** [40 CFR 63.454; 63.455]

- m. The results of the CMS monitoring, Enclosure System monitoring, and Closed Vent System monitoring shall be maintained (in written or electronic format) per the requirements of 40 CFR 63.454 and 63.455.
- n. The Permittee shall maintain the following records of malfunction: [40 CFR 63.454(g)]
- Records of the occurrence and duration of each malfunction operation (i.e., process equipment) or the air pollution control and monitoring equipment.
  - Records of actions taken during periods of malfunction to minimize emissions in accordance with Section 2.2 A.1.l above, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the recordkeeping requirements in Sections 2.2 A.1.m and 2.2 A.1.n above are not met.

**Reporting** [15A NCAC 02Q .0508(f), 40 CFR 63.454; 63.455]

- o. Permittee shall submit a summary report of excess emissions postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. When no exceedances of an operating parameter have occurred, such information shall be included in the report.
- p. The Permittee shall comply with the reporting requirements of 40 CFR 63, Subpart A as specified in Table 1 of 40 CFR 63.440.

**B. 40 CFR 63, Subpart S Affected Sources Permitted per 40 CFR 63.447 Clean Condensate Alternative:**

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
<b>HVLC System Sources Under Clean Condensate Alternative</b>			
ES-BSW1	Brownstock washing - 40 CFR Part 63.443(a)(1)(iii)	NA	No control will be required for HAP emissions from brownstock washing and oxygen delignification systems under the MACT approved Clean Condensate Alternative option, authorized under 40 CFR §63.447.
ES-O2D1	Oxygen Delignification System - 40 CFR Part 63.443(a)(1)(v)		
			Under this option, the Permittee will perform projects that reduce methanol emissions from the Riegelwood Mill by an amount equivalent to the methanol reductions that would be achieved by HVLC emissions control and use an equation to demonstrate compliance with the Clean Condensate Alternative methanol emissions control requirements on a 180 day rolling total basis.

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulations
Hazardous Air Pollutants	<p><b><u>Pulp Washing and Oxygen Delignification Systems</u></b></p> <p>In lieu of controlling the pulp washing and oxygen delignification systems, perform the following Clean Condensate Alternative projects and demonstrate ongoing compliance with Subpart S using the Ecredit and Edebit equations in Section 2.2 B.1.f:</p> <ul style="list-style-type: none"> <li>Replace the Nos. 1, 2 and 3 Weak Black Liquor Ponds and Gum Storage Tanks with the New Weak Black Liquor Storage Tanks (ID Nos. ES-T001 and ES-T002) and the existing Weak Black Liquor Storage Tank (ES-G96 –“The Big M” Tank),</li> <li>Process black liquor in the upgraded Recovery Boiler No. 5 in lieu of Recovery Boiler No. 3,</li> <li>Reduce methanol emissions from the BLOX and recovery boilers, and</li> <li>Collect and treat additional condensates in the steam strippers.</li> </ul>	15 A NCAC 02D .1111 (40 CFR 63 Subpart S including by reference the MACT Clean Condensate Alternative, 40 CFR 63.447)

**1. 15A NCAC 02D .1111: (MACT 40 CFR 63 SUBPART S, INCLUDING 40 CFR 63.447 THE CLEAN CONDENSATE ALTERNATIVE)**

- a. Unless otherwise indicated below, the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63 Subpart S, including Subpart A "General Provisions" as defined per 63.440(g), and, 63.447 the Clean Condensate Alternative (a MACT approved alternative to 63.443 HVLC control

requirements), as indicated in CCA Table 1 of Subpart S. As outlined in CCA Table 1, per 40 CFR 63.6(f)(1), these emission standards shall apply at all times unless otherwise specified in 40 CFR Part 63, Subpart S. Terms used throughout this section are defined in the Clean Air Act as amended in 1990 and in 40 CFR 63.2 and 63.441. Units and abbreviations are defined in 40 CFR 63.3 [15A NCAC 02D .1111].

**Emission Limitations** [15A NCAC 02D .1111 (referencing the MACT standard and subsequently 40 CFR 63.447, the Clean Condensate Alternative)]

**Clean Condensate Alternative Standards for the HVLC pulp washing and oxygen delignification systems at Kraft processes** [63.443(a) and 40 CFR 63.447]

- b. The Permittee shall meet the following control requirements for the total HAP emissions from the pulp washing (ID No. ES-BSW1), and oxygen delignification systems (ID No. ES-O2D1); [40 CFR 63.443 and 40 CFR 63.447, Clean Condensate Alternative]:
  - i. No control shall be required for the emissions from the Nos. 1 Brownstock Washer Set (ID No. ES-BSW1), from the Oxygen Delignification System (ID No. ES-O2D1), and/or from the Nos. 1, 2 and 3 Unscreened Stock Tanks;
  - ii. The Permittee shall eliminate all HAP emissions from the existing Nos. 1, 2 and 3 Weak Black Liquor (WBL) Ponds and the existing Nos. 1, 2 and 3 Weak Black Liquor (WBL) Gum Tanks:
    - (A) The existing Nos. 1, 2 and 3 WBL Ponds shall be drained of all liquor and removed from service and any weak black liquor source streams that otherwise would have been stored in these ponds shall be stored in either of the two new WBL storage tanks (ID Nos. ES-T001 and ES-T002) and/or the existing Big “M” WBL storage tank (ID No. ES-G96);
    - (B) The Permittee shall drain and permanently remove from black liquor service the three existing gum storage tanks;
    - (C) The Permittee shall be prohibited from any future storage of weak black liquor in storage ponds or lagoons.
  - iii. The Permittee shall perform the following methanol emissions reduction projects to the extent needed to achieve methanol emissions reductions that are equivalent to the Subpart S HVLC control requirements, as demonstrated by the equations in Section 2.2 B.1.f:
    - (A) Recovery Boiler No. 3 (ID No. ES-RB3) shall be permanently removed from service and the black liquor from the BLOX/Recovery Boiler No. 3 system transferred to the lower emitting Recovery Boiler No. 5 (ID No. ES-RB5); and
    - (B) The Permittee shall collect and treat additional process condensates.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111, if the conditions in b. ii and iii, above are not met.
- c. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the emission source(s), including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with the general provisions in 40 CFR 63.6(e). Malfunctions shall be corrected as soon as practicable after their occurrence. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

**Emissions Testing** [15A NCAC 02Q .0508(f); 40 CFR 63.457 and 63.447]

- d. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limits given in Section 2.2 B.1.a above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Emission Factor Revision and/or Re-verification Testing** [15A NCAC 02Q .0508(f); 40 CFR 63.457 and 63.447]

- e. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ.

**CCA Table 1 Emission Factor Revision and/or Re-Verification**

- i. Unless expressly forbidden as detailed in Section 2.2 B.1.e.ii, all emission factors in CCA Table 1 of Section 2.2 B.1.f may be revised and/or re-verified as needed, or as requested by DAQ, through emission testing. Any testing shall be conducted in accordance with a protocol approved by the Division of Air Quality Technical Services Branch, Raleigh Central Office. The results of the emissions testing shall be used to update the appropriate methanol emission factor(s) in CCA Table 1 of Section 2.2 B.1.f Once approved by DAQ, new emission factors shall be retroactively applied back to the date of the emissions testing used to establish the new emission factors.
- ii. With the exception of E10.Pond.Emit, E8.RB3.EF<sub>old</sub>, E8.RB4.EF<sub>old</sub>, E8.RB5split, E8.RB5.EF<sub>old</sub>, and

E8.BLOX.EF<sub>old</sub>, all emission factors may be re-determined based on methanol emissions testing conducted as described in Section 2.2 B.1.e. Any revisions to the emission factors contained in CCA Table 1 shall be made via administrative amendment. Once approved by DAQ, new (tested) emission factors shall be retroactively applied back to the date of the emissions testing used to establish the new emission factors. Revised or new debits, or calculated (increased) emission factors shall become effective within seven days following the effective date of the DAQ approval.

**Additional Credits**

- iii. Any additional credits that have not otherwise been expressly identified in Section 2.2 B.1.f cannot be used to demonstrate compliance until a permit application has been submitted and the additional credits incorporated into the permit.

**Monitoring for the Clean Condensate Alternative Approach** [40 CFR 63.447, 63.453]

- f. Compliance shall be determined by comparing the methanol emissions debits to the methanol emissions credits over a 180-day rolling total. Calculations for credits or debits (listed in Section 2.2 B.1.f and CCA Table 1), will not execute during each 24-hour mill operating day constituting a full mill shutdown (across all process areas). Shutdowns (for a full 24-hour mill day) of a given process or process area within the mill, will be manually recorded in the CMS as having either zero credits or debits (whichever applies for the 24-hour mill day in question). Days where any process in CCA Table 1 operates for a partial mill day will continue to calculate credits or debits following the calculations in 2.2 B.1.f. The following equations shall be used to calculate the daily debit (Edebit<sub>i</sub>), and the 180-day rolling total debit (Edebit<sub>total</sub>), and additionally, the daily credit (Ecredit<sub>i</sub>), and the 180-day rolling total credit (Ecredit<sub>total</sub>):

$$\text{Edebit}_i = \text{E1.1BSW.Emit} + \text{E2.O2Delig.Emit} + \text{E3.UnsStkTk.Emit} + \text{E4.4BSW.Emit} + \text{E6.WBL.Emit} + \text{E7.SWR.Emit}$$

$$\text{Ecredit}_i = \text{E8.Rec.Emit} + \text{E9.Pond.Emit} + \text{E10.Gum.Emit} + \text{E11.SScollect.Emit}$$

$$\text{Edebit}_{\text{total}} = \sum_{i=1}^{180} \text{Edebit}_i \quad \text{where } i \text{ indicates each of the last 180 mill production days}$$

$$\text{Ecredit}_{\text{total}} = \sum_{i=1}^{180} \text{Ecredit}_i \quad \text{where } i \text{ indicates each of the last 180 mill production days}$$

Where:

Edebit<sub>i</sub> is the total emission debit for the i<sup>th</sup> mill day,

And:

E1 through E4 represent the original HVLC collection scope (as though the HVLC gases were otherwise controlled in a combustion source meeting the MACT required 98% treatment level (0.98)).

$$\text{E1.1BSW.Emit} = (0.98) * (\text{E1.1BSW.EF} * \text{CRatio5\&6} * \text{P1.1BSW})$$

$$\text{E2.O2Delig.Emit} = (0.98) * (\text{E2.O2Delig.EF} * \text{CRatio5\&6} * \text{P2.O2Delig})$$

$$\text{E3.UnsStkTk.Emit} = (0.98) * (\text{E3.UnsStkTk.EF} * \text{CRatio5\&6} * \text{P3.UnsStkTk})$$

$$\text{E4.4BSW.Emit} = (0.98) * (\text{E4.4BSW.EF} * \text{CRatio4} * \text{P4.4BSW})$$

Where:

E1 through E4 = Methanol LB/ODTUP Emission Factors As Follows:

E1.1BSW.EF = No. 1 Brownstock Washer Line

E2.O2Delig.EF = Oxygen Delignification System

E3.UnsStkTk.EF = Unscreened Stock Tanks



**E4.4BSW.EF** = No. 4 Brown Stock Washer Line

**And:**

$$\mathbf{CRatio5\&6} = (\mathbf{C5\&6Shwr_{weekly}} / \mathbf{C5\&6Shwr_{bsln}}).$$

$$\mathbf{CRatio4} = (\mathbf{C4Shwr_{weekly}} / \mathbf{C4Shwr_{bsln}}).$$

**C5&6Shwr<sub>weekly</sub>** = The Nos. 5 and 6 Decker Shower Water, Post-Pond Closure Actual Weekly Average Methanol Concentration (ppm)

**C4Shwr<sub>weekly</sub>** = The No. 4 Decker Shower Water, Post-Pond Closure Actual Weekly Average Methanol Concentration (ppm)

**C5&6Shwr<sub>bsln</sub>** = The Nos. 5 and 6 Decker Shower Water, Pre-Pond Closure 41-Week Baseline Weekly Average Methanol Concentration (ppm). The concentration is fixed at 312.2parts per million (ppm) of methanol.

**C4Shwr<sub>bsln</sub>** = The No.4 Decker Shower Water, Pre-Pond Closure Actual 41-Week Baseline Weekly Average Methanol Concentration (ppm). The concentration is fixed at 154.9parts per million (ppm) of methanol.

If **CRatio (4 or 5&6)** proves to have a normal distribution around the baseline average, no net change in the debits will be apparent, even though daily increases and decreases may occur. If however, there is a statistical shift in methanol to the condensates following closure of the weak black liquor ponds, then, the frequency and/or magnitude of emission factor increases will cause the overall debits to increase for the pulping system emissions.

**And:**

**P1.1BSW through P4.4BSW correspond to the ODTUP/Day processed by:**

**P1.1BSW** = No. 1 Brownstock Washer

**P2.O2Delig** = Oxygen Delignification System

**P3.UnsStkTk** = Nos. 1, 2, and 3 Unscreened Stock Tanks

**P4.4BSW** = No. 4 Brownstock Washer Line

**E6.WBL.Emit** is the fixed mass emission in CCA Table 1 in pounds of methanol per day, emitted from 1206 gallons per minute (annualized average) of weak black liquor (WBL) flow previously sent to the Nos. 1 and 3 Weak Black Liquor Ponds. Following WBL Pond closure, the 1206gpm (equal to 466 equivalentODTUP/day) will be redirected to flow through any of three weak black liquor storage tanks (including, the two newly constructed WBL Tanks ES-T001 and/or ES-T002, and/or the Big “M” Tank, ES-G96).

$$\mathbf{E6.WBL.Emit} = (\mathbf{E6.WBL.EF} * \mathbf{P6.WBL.Transfer}) = \mathbf{lb/day\ methanol\ fixed\ debit}$$

**Where:**

$$\begin{aligned}\mathbf{E6.WBL.EF} &= \text{Methanol lb/eODTUP converted emission factor} \\ &= \text{Methanol lb/hr at time of air test) / (Black Liquor Solids lb/hr WBL Tank} \\ &\quad \text{throughput at time of air test)} \\ &= \text{Methanol lb/lb BL Solids emission factor} \\ &= (\text{Methanol lb/lb BL Solids}) * (3595\text{lb BL Solids/equivalent ODTUP mill} \\ &\quad \text{conversion factor}) \\ &= \text{Methanol lb/eODTUP emission factor}\end{aligned}$$

$$\mathbf{P6.WBL.Transfer} = 1206 \text{ gpm WBL transfer which converts to } 466 \text{ eODTUP/day equivalent pulp production}$$

**E7.SWR.Emit** is the additional methanol emitted to the atmosphere after pond closure in pounds per month, from sewerage excess condensate at the decker feed tank(s), through mill trench “re-emission” calculated as follows:

**Where:**

$$\begin{aligned} \text{E7.SWR.Emit} &= (\text{E7.SwrFxdMass} * \text{E7.Trench.EF}) = \text{lb/day emitted from Sewer Trench (fixed daily debit)} \\ &= (1776.4 \text{ lb/day} * 0.1422) = 252.25 \text{ lb/day methanol} \end{aligned}$$

**And:**

$$\text{E7.SwrFxdMass} = (54,032 \text{ lb/month methanol sewerred} * 12 \text{ months/yr}) / (365 \text{ days/yr}) = 1776.4 \text{ lb/day methanol to sewer trench}$$

$$\text{E7.Trench.EF} = \text{EPA Water9 Model \& Site Specific Data calculated sewer trench volatilization to atmosphere fraction calculated as } 0.1422$$

**And:**

**Ecredit<sub>i</sub>** is the total emission credit for the **i<sup>th</sup>** mill day,

**E8.Rec.Emit** is the methanol reduction from the BLOX system, Recovery Boiler No. 4 and Recovery Boiler No. 5 for each mill day, following shutdown of the Recovery Boiler No. 3.

$$\text{E8.Rec.Emit} = \text{E8.RB345}_{\text{bsln}} - \text{E8.RB45}_{\text{new}}$$

Note: E8.Rec.Emit daily credit can be negative or positive.

$$\text{E8.RB45}_{\text{new}} = (\text{E8.RB4.Emit}_{\text{new}} + \text{E8.RB5.Emit}_{\text{new}} + \text{E8.BLOX.Emit}_{\text{new}})$$

$$\text{E8.RB345}_{\text{baseline}} = (\text{E8.RB3.Emit}_{\text{old}} + \text{E8.RB4.Emit}_{\text{old}} + \text{E8.RB5.Emit}_{\text{old}} + \text{E8.BLOX.Emit}_{\text{old}})$$

$$\text{E8.RB4.Emit}_{\text{new}} = (\text{E8.RB4.EF}_{\text{new}} * \text{P8.TBLS4}_{\text{new}}) = \text{lb/day methanol}$$

$$\text{E8.RB5.Emit}_{\text{new}} = (\text{E8.RB5.EF}_{\text{new}} * \text{P8.TBLS5}_{\text{new}}) = \text{lb/day methanol}$$

$$\text{E8.BLOX.Emit}_{\text{new}} = (\text{E8.BLOX.EF}_{\text{new}} * \text{P8.TBLS4}_{\text{new}}) = \text{lb/day methanol}$$

**Where:**

**P8.TBLS4<sub>new</sub>** = Total (current) TBLS Fired by Recovery Boiler No. 4 for the each mill day,

**P8.TBLS5<sub>new</sub>** = Total (current) Tons Black Liquor Solids (TBLS) fired by Recovery Boiler No. 5 for the each mill day,

**E8.RB4.EF<sub>new</sub>** = Post-Pond Closure New Methanol Emission Factor from Recovery Boiler No. 4

**E8.RB5.EF<sub>new</sub>** = Post-Pond Closure New Methanol Emission Factor from Recovery Boiler No. 5

**E8.BLOX.EF<sub>new</sub>** = Post-Pond Closure New Methanol Emission Factor from the BLOX System

**And:**

$$\text{E8.RB3.Emit}_{\text{old}} = (\text{E8.RB3.EF}_{\text{old}} * \text{P8.TBLS3}_{\text{old}}) = \text{lb/day methanol}$$

$$\text{E8.RB4.Emit}_{\text{old}} = (\text{E8.RB4.EF}_{\text{old}} * \text{P8.TBLS4}_{\text{old}}) = \text{lb/day methanol}$$

$$\text{E8.RB5.Emit}_{\text{old}} = (\text{E8.RB5.EF}_{\text{old}} * \text{P8.TBLS5}_{\text{old}}) = \text{lb/day methanol}$$

$$\text{E8.BLOX.Emit}_{\text{old}} = (\text{E8.BLOX.EF}_{\text{old}} * (\text{P8.TBLS3}_{\text{old}} + \text{P8.TBLS4}_{\text{old}})) = \text{lb/day methanol}$$

**Where:**

**E8.RB3<sub>split</sub> = 15%** (Fixed 2002 No.3RB TBLS Processed Percent Out of Total RB3, 4, & 5 TBLS Feed)

**E8.RB4<sub>split</sub> = 26%** (Fixed 2002 No.4RB TBLS Processed Percent Out of Total RB3, 4, & 5 TBLS Feed)

**E8.RB5<sub>split</sub> = 59%** (Fixed 2002 No.5RB TBLS Processed Percent Out of Total TBLS RB3, 4, & 5 Feed)

**P8.TBLS45<sub>new</sub>** = Total (current) Combined TBLS Fired by No.4 and No.5 Recovery Boiler for each mill day  $P8.TBLS45_{new} = (P8.TBLS4_{new} + P8.TBLS5_{new})$

**P8.TBLS3<sub>old</sub>** =  $(E8.RB3_{split} * P8.TBLS45_{new}) = (0.15 * TBLS45_{new})$  = Total TBLS that would have been fired by No.3 Recovery Boiler, if it was still running

**P8.TBLS4<sub>old</sub>** =  $(E8.RB4_{split} * P8.TBLS45_{new}) = (0.26 * TBLS45_{new})$  = Total TBLS that would have been fired by No.4 Recovery Boiler, if No.3RB was still running

**P8.TBLS5<sub>old</sub>** =  $(E8.RB5_{split} * P8.TBLS45_{new}) = (0.59 * TBLS45_{new})$  = Total TBLS that would have been fired by No.5 Recovery Boiler, if No.3RB was still running

**E8.RB3.EF<sub>old</sub>** = Pre-Pond Closure Combined Emission Factor for (BLOX1&2 + No.3Recovery Boiler), given as **(0.192 + 0.08) = 0.272 lb/TBLS**

**E8.RB4.EF<sub>old</sub>** = Pre-Pond Closure Old Methanol Emission Factor from the No.4 Recovery Boiler, given as **0.08 lb/TBLS**

**E8.RB5.EF<sub>old</sub>** = Pre-Pond Closure Old Methanol Emission Factor from No.5 Recovery Boiler No.5, given as **0.015 lb/TBLS**

**E8.BLOX.EF<sub>old</sub>** = Pre-Pond Closure Old Methanol Emission Factor from the BLOX System, given as **0.192 lb/TBLS**

**E9.Gum.Emit** is the emission rate of methanol, in pounds per mill day, from the shutdown No.2 Gum Tank, given as a fixed emissions reduction credit in the equation below:

**E9.Gum.Emit** = 0.912 lb/hr of methanol \* 24 hours/day = **21.9 lb/day** methanol fixed emission reduction credit.

**E10.Pond.Emit** is total emission rate of methanol, in pounds per mill day, from the closed weak black liquor storage ponds, from CCA Table 1, given as 110,332 lb/month or on a daily basis as calculated below:

**E10.Pond.Emit** = 110,332 lb/month \* 12 months/yr / 365 days/yr = **3627.4 lb/day** methanol fixed emission reduction credit.

**E11.SScollect.Emit** is the emission reduction credit for condensate overcollection and treatment in pounds of methanol for the each mill day, and is based on the condensates collected and treated above that required by 40 CFR 63.446.

**E11.SScollect.Emit** =  $(E11.SSPhase1Actual - E11.SSPhase1Req+Margin) * P11.Total * E11SSPhase1SSEff\%$  \* E7.Trench.EF

**Where:**

**E11.SSPhase1Actual** = 15-Day Rolling Average Methanol, Daily Value lbs/ODTUP

**E11.SSPhase1Req+Margin=12.91lb/ODTUP** = 11.1 lb/ODTUP Phase I Required + 10% Safety Margin (at 10% \* 11.1lb/ODTUP = 1.11 lb/ODTUP) =12.21 lb/ODTUP, + 0.7 lbs/ODTUP extra = 12.91 lb/ODTUP

**P11.Total** = Total mill daily digester production for tons of unbleached pulp production (ODTUP/Day)

**E11.SSPhase1SSEff%** = 92% Treatment or 0.92 Fraction Treated in Steam Stripper Systems

**E7.Trench.EF** = 14.22% Volatilization from Mill Sewer Trench (or 0.1422 fraction emitted)

Note: **E11.SScollect.Emit** is taken to be zero for the day in question, if 15 day rolling average methanol daily value is less than 12.91 lb/ton.

**Edebit<sub>total</sub>** is the total emission debit for the 180 day rolling total

**Ecredit<sub>total</sub>** is the total emission credit for the 180 day rolling total

CCA Table 1. Methanol Emission Factors for Edebit and Ecredit Equations

Parameter	Value	Units (methanol)	Notes
<u>Edebit:</u>			Each Edebit parameter is calculated daily and accrued into a 180 day rolling total
<b><u>HVLC SCOPE EMISSIONS DEBIT</u></b> <b><u>(E1.1BSW.Emit, E2.O2Delig.Emit, E3.UnsStkTk.Emit, E4.4BSW.Emit)</u></b>			
E1.1BSW.Emit		lb/day	$(0.98) * (E1.1BSW.EF * CRatio5\&6 * P1.1BSW)$
E2.O2Delig.Emit		lb/day	$(0.98) * (E2.O2Delig.EF * CRatio5\&6 * P2.O2Delg)$
E3.UnsStkTk.Emit		lb/day	$(0.98) * (E3.UnsStkTk.EF * CRatio5\&6 * P3.UnsStkTk)$
E4.4BSW.Emit		lb/day	$(0.98) * (E4.4BSW.EF * CRatio4 * P4.4BSW)$
E1.1BSW.EF	0.3719 (fixed)	lb/ODTUP	No. 1BSW Emission Factor
E2.O2Delig.EF	0.9390 (fixed)	lb/ODTUP	O2 Delignification System Emission Factor.
E3.UnsStkTk.EF	0.0021 (fixed)	lb/ODTUP	Nos. 1, 2, and 3 Unscreened Stock Tanks Combined Emission Factor.
E4.4BSW.EF	1.2520 (fixed)	lb/ODTUP	No. 4 BSW Emission Factor
CRatio5&6		Ratio	$= (C5\&6Shwr_{weekly} / C5\&6Shwr_{bsln})$ .
CRatio4		Ratio	$= (C4Shwr_{weekly} / C4Shwr_{bsln})$ .
C5&6Shwr <sub>weekly</sub>	Weekly test	parts per million (ppm)	The Nos. 5 and 6 Decker Shower Water, Post-Pond Closure Actual Weekly Average Methanol Concentration
C4Shwr <sub>weekly</sub>	Weekly test	parts per million (ppm)	The No. 4 Decker Shower Water, Post-Pond Closure Actual Weekly Average Methanol Concentration
C5&6Shwr <sub>bsln</sub>	312.2 (fixed)	parts per million (ppm)	The pre-pond closure 41-Week Baseline Weekly Average Methanol Concentration for the evaporator condensates feeding the Nos. 5 and 6 Deckers. This concentration is fixed.
C4Shwr <sub>bsln</sub>	154.9 (fixed)	parts per million (ppm)	The pre-pond closure 41-Week Baseline Weekly Average Methanol Concentration for the evaporator condensates feeding the No. 4 Decker Showers. This concentration is fixed.
P1.1BSW		ODTUP/day	Pulp processed by No. 1 Brownstock Washer
P2.O2Delg		ODTUP/day	Pulp processed by Oxygen Delignification System
P3.UnsStkTk		ODTUP/day	Pulp processed by Nos. 1, 2 and 3 Unscreened Stock Tanks
P4.4BSW		ODTUP/day	Pulp processed by No. 4 Brownstock Washer
<b><u>WEAK BLACK LIQUOR TRANSFER DEBIT</u></b> <b><u>(E6.WBL.Emit)</u></b>			
E6.WBL.Emit	(fixed daily debit lb/day)	lb/day	$= (E6.WBL.EF * P6.WBL.Transfer) = \text{lb/day methanol (post pond closure fixed debit)}$ .
E6.WBL.EF	0.022	lb/eODTUP	Methanol emission factor in pounds per equivalent pulp ton corresponding to the methanol tank emission of 1206 gal/min of weak black liquor (WBL) transferred from Nos. 1&3WBL Ponds to any of 3WBL Tanks.
P6.WBL.Transfer	465.6	eODTUP/day	1206 gal/min WBL equates to 465.6 eODTUP/Day

Parameter	Value	Units (methanol)	Notes
<b><u>SEWERED CONDENSATE RE-EMISSION DEBIT</u></b> <b><u>(E7.Swr.Emit)</u></b>			
<b>E7.Swr.Emit</b>	252.3 (fixed)	lb/day	= (E7.SwrFxdMass * E7.Trench.EF) = lb/day emitted from Sewer Trench (fixed daily debit).
<b>E7.SwrFxdMass</b>	1776.4	lb/day	54,032 lb/month methanol sewered * 12 months/yr)/(365days/yr) = 1776.4 lb/day methanol to sewer trench
<b>E7.Trench.EF</b>	0.1422 (fixed)	~	Fraction of methanol in the condensate sewered at the decker feed tank(s) that is reemitted to the atmosphere as determined using the EPA Water 9 Model
<b><u>Ecredit:</u></b>			Each Ecredit parameter is calculated daily and accrued into a 180 day rolling total
<b><u>NO. 3 RECOVERY BOILER SHUTDOWN CREDIT OR DEBIT</u></b> <b><u>(E8.Rec.Emit)</u></b>			
<b>E8.Rec.Emit</b>		lb/day	$E8.Rec.Emit = E8.RB345_{bsln} - E8.RB45_{new}$  The methanol emission reduction from the BLOX system, Recovery Boiler No. 4 and Recovery Boiler No. 5 for each mill day, following shutdown of Recovery Boiler No. 3. It is possible this value can be positive or negative.
<b>E8.RB345<sub>bsln</sub></b>		lb/day	$E8.RB345_{bsln} = (E8.RB3.Emit_{old} + E8.RB4.Emit_{old} + E8.RB5.Emit_{old} + E8.BLOX.Emit_{old})$
<b>E8.RB45<sub>new</sub></b>		lb/day	$E8.RB45_{new} = (E8.RB4.Emit_{new} + E8.RB5.Emit_{new} + E8.BLOX.Emit_{new})$
<b>E8.RB3.Emit<sub>old</sub></b>		lb/day	$E8.RB3.Emit_{old} = (E8.RB3.EF_{old} * P8.TBLS3_{old})$
<b>E8.RB4.Emit<sub>old</sub></b>		lb/day	$E8.RB4.Emit_{old} = (E8.RB4.EF_{old} * P8.TBLS4_{old})$
<b>E8.RB5.Emit<sub>old</sub></b>		lb/day	$E8.RB5.Emit_{old} = (E8.RB5.EF_{old} * P8.TBLS5_{old})$
<b>E8.BLOX.Emit<sub>old</sub></b>		lb/day	$E8.BLOX.Emit_{old} = (E8.BLOX.EF_{old} * (P8.TBLS3_{old} + P8.TBLS4_{old}))$
<b>E8.RB4.Emit<sub>new</sub></b>		lb/day	$E8.RB4.Emit_{new} = (E8.RB4.EF_{new} * P8.TBLS4_{new})$
<b>E8.RB5.Emit<sub>new</sub></b>		lb/day	$E8.RB5.Emit_{new} = (E8.RB5.EF_{new} * P8.TBLS5_{new})$
<b>E8.BLOX.Emit<sub>new</sub></b>		lb/day	$E8.BLOX.Emit_{new} = (E8.BLOX.EF_{new} * P8.TBLS4_{new})$
<b>E8.RB5.EF<sub>new</sub></b>	0.0134	lb/TBLS	The methanol emission factor for Recovery Boiler No. 5 - after pond closure.
<b>E8.RB5.EF<sub>old</sub></b>	0.015 (fixed)	lb/TBLS	The methanol emission factor for Recovery Boiler No. 5 prior to pond closure. This value cannot be changed.
<b>E8.RB4.EF<sub>new</sub></b>	0.2806	lb/TBLS	The methanol emission factor for Recovery Boiler No. 4 after pond closure.
<b>E8.RB4.EF<sub>old</sub></b>	0.080 (fixed)	lb/TBLS	The methanol emission factor for Recovery Boiler No. 4 prior to pond closure. This value cannot be changed.
<b>E8.BLOX.EF<sub>new</sub></b>	0.879	lb/TBLS	The methanol emission factor for the black liquor oxidation system after pond closure.
<b>E8.BLOX.EF<sub>old</sub></b>	0.192 (fixed)	lb/TBLS	The methanol emission factor for the black liquor oxidation system prior to pond closure. This value cannot be changed.

Parameter	Value	Units (methanol)	Notes
<b>E8.RB3.EF<sub>old</sub></b>	0.272 (fixed)	lb/TBLS	The sum of the emission factors for the <u>BLOX and Recovery Boiler No. 3</u> . This is used to determine the emission reduction from transferring black liquor from the Recovery Boiler No. 3 system to the lower emitting Recovery Boiler No. 5. This value cannot be changed.
<b>E8.RB3<sub>split</sub></b>	15% (fixed)	Fraction $15\% / 100 = 0.15$	The fraction of the total black liquor solids sent to Recovery Boiler No. 3 in 2002. This value cannot be changed.
<b>E8.RB4<sub>split</sub></b>	26% (fixed)	Fraction $26\% / 100 = 0.26$	The fraction of the total black liquor solids sent to Recovery Boiler No. 4 in 2002. This value cannot be changed.
<b>E8.RB5<sub>split</sub></b>	59% (fixed)	Fraction $59\% / 100 = 0.59$	The fraction of the total black liquor solids sent to Recovery Boiler No. 5 in 2002. This value cannot be changed.
<b>P8.TBLS45<sub>new</sub></b>		TBLS/day	Total (current) Combined TBLS Fired by Recovery Boiler Nos. 4 and No. 5 for each mill day $P8.TBLS45_{new} = (P8.TBLS4_{new} + P8.TBLS5_{new})$
<b>P8.TBLS3<sub>old</sub></b>		TBLS/day	$E8.RB3_{split} * P8.TBLS45_{new} = (0.15 * P8.TBLS45_{new}) =$ Total TBLS that would have been fired by Recovery Boiler No. 3, if it was still running
<b>P8.TBLS4<sub>old</sub></b>		TBLS/day	$(E8.RB4_{split} * P8.TBLS45_{new}) = (0.26 * P8.TBLS45_{new}) =$ Total TBLS that would have been fired by Recovery Boiler No. 4, if Recovery Boiler No. 3 was still running
<b>P8.TBLS5<sub>old</sub></b>		TBLS/day	$(E8.RB5_{split} * P8.TBLS45_{new}) = (0.59 * P8.TBLS45_{new}) =$ Total TBLS that would have been fired by Recovery Boiler No. 5, if Recovery Boiler No. 3 was still running
<b><u>NO. 2 GUM TANK SHUTDOWN FIXED CREDIT</u></b> <b><u>(E9.Gum.Emit)</u></b>			
<b>E9.Gum.Emit</b>	21.9 (fixed)	lb/day	Credit from shutdown of No. 2 Gum Tank, given as: pre-pond closure air test of 0.912 lb/hr of methanol * 24 hours/day = 21.9 lb/day methanol fixed emission reduction credit.
<b><u>WBL POND CLOSURE FIXED CREDIT</u></b> <b><u>(E10.Pond.Emit)</u></b>			
<b>E10.Pond.Emit</b>	3627.4 (fixed)	lb/day	Black liquor ponds emission rate. This value cannot be changed. $E10.Pond.Emit = 110,332 \text{ lb/month} * 12 \text{ months/yr} / 365 \text{ days/yr} = 3627.4 \text{ lb/day}$ methanol fixed emission reduction credit.

Parameter	Value	Units (methanol)	Notes
<b><u>MACT I STEAM STRIPPED OVER-COLLECTION CREDIT</u></b> <b><u>(E11.SScollect.Emit)</u></b>			
<b>E11.SScollect.Emit</b>	Defined by monitoring (calculated daily)	lb/day	$E11.SScollect.Emit = (E11.SSPhase1Actual - E11.SSPhase1Req + Margin) * P11.Total * E11.SSPhase1SEff\%$ $E11.SSPhase1SEff\% * E7.Trench.EF$ <p>The methanol credit for the condensate over collection and treatment determined by monitoring data. This credit is based on the condensates collected and treated, beyond those required to be collected and treated in order to meet the requirements of 40 CFR 63.446.</p>
<b>E11.SSPhase1Actual</b>	15-day rolling avg (daily)	lb/ODTUP	15-Day Rolling Average Methanol, Daily Value lbs/ODTUP
<b>E11.SSPhase1Req+Margin</b>	12.91 (Fixed)	lb/ODTUP	$12.91 \text{ lb/ODTUP} = 11.1 \text{ lb/ODTUP Phase I Required} + 10\% \text{ Safety Margin (at } 10\% * 11.1 \text{ lb/ODTUP} = 1.11 \text{ lb/ODTUP)} = 12.21 \text{ lb/ODTUP,} + 0.7 \text{ lbs/ODTUP extra} = 12.91 \text{ lb/ODTUP}$
<b>P11.Total</b>	Actual Daily Mill Pulp Tons	ODTUP/day	Total mill daily digester production for tons of unbleached pulp production $= (P1.1BSW + P4.4BSW \text{ from above})$

The Permittee shall monitor each component of Ecredit<sub>i</sub> and Edebit<sub>i</sub>, to demonstrate compliance, specifically including but not limited to, the following:

- P1.1BSW through P4.4BSW as above;
- The tons of black liquor solids fired by Recovery Boiler No. 4 (P8.TBLS4) and by Recovery Boiler No. 5 (P8.TBLS5); and
- The pounds of methanol that are collected above 12.91 lb/ODTUP (E11.SScollect.Emit) for treatment in the steam stripper system.

The Permittee shall calculate Ecredit<sub>i</sub> and Edebit<sub>i</sub> for each mill operating day, and subsequently, shall calculate the 180 day rolling total comparison of Ecredit<sub>i</sub> and Edebit<sub>i</sub> that will be used to demonstrate compliance. If Edebit<sub>total</sub> is greater than Ecredit<sub>total</sub>, then the facility shall be deemed in non-compliance with 15A NCAC 02D .1111. Any retesting shall be conducted in accordance with Section 2.2 B.1.d Any additional credits that have not otherwise been identified Section 2.2 B.1.f cannot be used in equation Ecredit until a permit application has been submitted and the permit revised accordingly.

**Monitoring of Condensate-Related Control Requirements** [40 CFR 63.447, 63.453]

- The Permittee shall determine the weekly average methanol concentrations of the Nos. 5 and 6 Decker Showers and the No. 4 Decker Shower in accordance with a protocol approved by Division of Air Quality Technical Services Branch, Raleigh Central Office. The methanol concentration shall be determined by daily composite or grab sampling during the 5 day work week, and if possible, (but not required) on weekends and holidays, and in accordance with the procedure set forth in 40 CFR 63.457(c)(3)(ii), and shall be reported in milligrams of methanol/Liter (or parts per million, ppm).
  - No. 4 Decker Shower Water and Nos. 5 and 6 Decker Showers - The post-pond shutdown, weekly tested average methanol concentration for the above-mentioned streams in CCA Table 2, shall be:
    - Utilized as the daily concentration for each day in the seven day week that shower water was sampled, and, for each respective shower water source sampled, as given in CCA Table 2.
    - The weekly average methanol concentration will be applied to all days in the seven-day week, including those where no sample was collected or analyzed, as with weekends and/or holidays.
    - In the case of days with invalid or missing data due to CMS malfunctions and downtime, the average shall be based on all valid data for the seven-day period.
    - In the rare event that no sample weekly average concentration is available (due to sampler failure, sample breakage, or other malfunction etc.), the highest weekly average concentration observed in the past 26 week period for the given sample stream, will be applied as the daily average concentration for each of the

- seven days for the week in question. Using this approach a conservatively high additional debit will be calculated for each day of the week in question.
- ii. C4ShwrWeekly and C5&6ShwrWeekly = No. 4 Decker Shower and No. 5 and No. 6 Decker Showers - The post-pond shutdown, weekly tested average methanol concentration shall be applied as follows:
    - (A) The daily average methanol concentration value will be divided by the 41-Week Baseline Average methanol concentration as given in CCA Table 2 creating a ratio of the Actual-to-Baseline methanol concentration values.
    - (B) The daily (Actual to Baseline) concentration ratio will be multiplied by the IPT established emission factor for each source as given in CCA Table 1, creating an Adjusted IPT emission factor in LB/ODTUP methanol.
    - (C) The Adjusted IPT emission factor will be multiplied by the unit production (ODTUP/Day) to determine the mass debits from each system (in lb/day methanol), each day.
    - (D) The Credit to Debit comparison will reflect daily movement in the Credit to Debit balance. This will reflect any net shift in methanol back to the process due to closure of the Nos. 1, 2, and 3 WBL Ponds. If a shift has occurred, the number and magnitude of actual weekly methanol concentrations above the 41-Week Baseline average will increase and result in a net additional debit entering the 180 day rolling total.
    - (E) The daily mass methanol debit values (in lb/day) will be accrued into the 180 day rolling total values.
    - (F) The 180 day rolling total Credit to Debit relationship must remain equal or greater than zero, otherwise the Permittee shall be deemed in noncompliance with the requirements in with 15A NCAC 02D .1111. The Permittee shall be required to implement a corrective plan no later than 60 days after the monitoring system calculates a negative 180 day rolling total. The corrective plan shall restore the 180 day rolling total to a positive credit balance equal or greater than zero.
  - h. The Permittee shall review, using a protocol approved by the Division of Air Quality, post pond closure Continuous Monitoring System data and/or new air emissions data to determine if reduced monitoring of any of the CCA parameters can be justified based on DAQ review.
    - i. If the Permittee can demonstrate to the Division of Air Quality that a positive credit balance can be achieved on a 180 day rolling total basis, (using existing emission factors or existing emission factors that are permanently increased (if a net debit increase is observed in the CMS) so as to create a permanently increased daily debit), then one or more of the shower water condensate monitoring requirements may be discontinued pending review and approval by the Division of Air Quality. The facility may at anytime following the first 26 weeks of CMS operation, submit supporting data (which can include CMS data from the first 26 weeks of CMS operation) and/or calculations to justify (1) discontinued condensate sampling and methanol testing of the systems utilizing condensates as given in CCA Table 2 and/or (2) conversion of calculated debits or credits, to fixed values, where appropriate and considered by DAQ to provide a continuous, conservative documentation of compliance. Revised or new debits or credits, or calculated (increased) emission factors shall become effective within seven days following the effective date of the DAQ approval.
    - ii. As an alternative to applying an additional fixed debit(s) or a permanent concentration ratio-adjusted emission factor to minimize or eliminate the need for condensate testing, the permittee may submit a test protocol, in accordance with Section 2.2 B.1.d, to re-determine the methanol emission factors from any of the sources in CCA Table 1 still in operation following closure of the Nos. 1, 2 and 3 WBL Ponds. Once approved by DAQ, new (tested) emission factors shall be retroactively applied back to the date of the emissions testing used to establish the new emission factors.
  - i. CMS malfunction and downtime may not exceed 2% of associated process operating time in any semi-annual period.



**CCA Table 2: Condensate/Shower Water Methanol Concentration Fixed Baseline Values**

Location	Value	Units	Valid Date Range	Notes
No. 5 and No. 6 Decker Showers <b>C5&amp;6Shwr<sub>bsln</sub></b>	<b>312.2mg/l (or ppm)</b>	Mg Methanol/L (ppm may be used in the calculations)	<b>41-Week Baseline (Straight Average)</b>	These deckers receive evaporator condensate and dilution water and feed decker filtrate counter-current to the O2 system and then subsequently to the New No.1 BSW/Press System
No. 4 Decker Showers <b>C4Shwr<sub>bsln</sub></b>	<b>154.9 mg/l (or ppm)</b>	Mg Methanol/L (ppm may be used in the calculations)	<b>41-Week Baseline (Straight Average)</b>	The No. 4 Decker receives evaporator condensate and dilution water and feeds decker filtrate countercurrent to the two-stage No. 4 BSW System

- j. The actual pounds of methanol that are collected in the condensates and the effectiveness of the steam stripper system (each of which are components of E11.SScollect.Emit as defined in Section 2.2 B.1.f) shall be monitored and determined by the following:
- The actual condensate collection shall be determined per the 40 CFR Part 63, Subpart S monitoring requirements as described in Section 2.2 A.1.h; and
  - The steam stripper system operation shall be monitored per the 40 CFR Part 63, Subpart S monitoring requirements as described in Section 2.2 A.1.j.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the monitoring required by Sections 2.2 B.1.g through 2.2 B.1.j is not conducted as specified above.

**Recordkeeping** [40 CFR 63.447, 63.454; 63.458]

- The Permittee shall keep and maintain monthly records in a logbook (written or electronic) of each component of Ecredit<sub>i</sub>, Edebit<sub>i</sub>, Edebit<sub>total</sub>, and Ecredit<sub>total</sub> monitoring.
- The Permittee shall keep and maintain records in a logbook (written or electronic) of all data used to determine the average methanol concentrations to the Nos. 5 and 6 Decker Showers and the No. 4 Decker Shower.
- The Permittee shall keep records in a logbook (written or electronic) of the results of the condensate collection and treatment monitoring.

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the records required by Sections 2.2 B.1.k through 2.2 B.1.m are not maintained.

**Reporting Requirements** [40 CFR 63.458, 63.447]

- The Permittee shall submit a semi-annual summary report to the Regional Air Quality Supervisor of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified. Additionally, each semi-annual report shall identify the following:
  - The total oven dried tons unbleached pulp, for the semi-annual reporting period for each of P1.1BSW through P4.4BSW;
  - The total tons black liquor solids (TBLS) fired, for the semi-annual reporting period, in Recovery Boiler No. 4 (P8.TBLS4),

- iii. The total TBLS fired for the semi-annual reporting period, in Recovery Boiler No. 5 (P8.TBLS5),
- iv.  $E_{11.SScollect.Emit}$  for the semi-annual reporting period,
- v.  $E_{7.SWR.Emit}$ , additional methanol emitted to the atmosphere after pond closure in pounds per month, from sewerage excess condensate at the decker feed tank(s)), for the semi annual reporting period,
- vi.  $E_{debit_i}$  as determined in Section 2.2 B.1.f,
- vii.  $E_{credit_i}$  as determined in Section 2.2 B.1.f,
- viii.  $E_{debit_{total}}$  for the semi-annual reporting period, and
- ix.  $E_{credit_{total}}$  for the semi-annual reporting period
- x. Weekly average methanol concentrations of the condensate used in the:
  - (A)  $C_{5\&6Shwr_{weekly}}$ , Nos. 5 and 6 Decker Showers
  - (B)  $C_{4Shwr_{weekly}}$ , No. 4 Decker Showers

The 41-Week Baseline average methanol concentration values will be included for each test location as given in CCA Table 2, as a reference in the semi-annual report.

- o. The Permittee shall comply with the applicable reporting requirements of 40 CFR 63, Subpart A as specified in Table 1 of 40 CFR 63.440.

**C. 40 CFR 63, Subpart MM Affected Sources:**

Source ID No.	Source Description	Control ID No	Control Description
ES-RB5	Recovery Boiler No. 5	CD-5RB-ESP	Electrostatic Precipitator
ES-ST5E and ES-ST5W	No. 5 East and West smelt dissolving tanks	CD-5EST-1 and CD-5WST-1	wet scrubber-fan impingement type and wet scrubber-fan impingement type (installed one each, respectively)
ES-K4001	Lime Kiln No. 4	CD-K4021 and CD-K4006	electrostatic precipitator and wet scrubber - fixed throat, spray venturi type

**Table MM-2**

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Hazardous Air Pollutants	<p><b><u>No. 5 Recovery Boiler</u></b></p> <ul style="list-style-type: none"> <li>PM emissions shall be no greater than 0.044 gr/dscf corrected to 8% oxygen.</li> <li>Opacity shall not be greater than 35 percent for 2 percent or more of the operating time within any semiannual period.</li> </ul> <p><b><u>No. 5 East Smelt Dissolving Tank</u></b></p> <ul style="list-style-type: none"> <li>PM emissions shall be no greater than 0.20 lb/TBLS.</li> <li>Scrubber liquid flow shall be no less than 135 gallons per minute (3-hour average), and scrubber fan amps shall be no less than 151 (3-hour average).</li> </ul> <p><b><u>No. 5 West Smelt Dissolving Tank</u></b></p> <ul style="list-style-type: none"> <li>PM emissions shall be no greater than 0.20 lb/TBLS.</li> <li>Scrubber liquid flow shall be no less than 135 gallons per minute (3-hour average), and scrubber fan amps shall be no less than 152 (3-hour average).</li> </ul> <p><b><u>Lime Kiln No. 4</u></b></p> <ul style="list-style-type: none"> <li>PM emissions shall be no greater than 0.064 gr/dscf, corrected to 10% oxygen.</li> <li>Opacity shall not be more than 20 percent for 3 percent or more of the operating time within any semiannual period.</li> </ul>	15A NCAC 02D .1111 (40 CFR 63 Subpart MM)

**1. 15A NCAC 02D .1111: MACT 40 CFR 63 SUBPART MM**

- a. Except as otherwise provided below, the Permittee shall comply with all applicable provisions, including the notification, testing, reporting, recordkeeping, and monitoring requirements contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR Part 63 Subpart MM, including Subpart A "General Provisions" as defined per 63.440(g) and indicated per Table 1 of Subpart MM. These emission standards shall apply at all times unless otherwise specified in 40 CFR Part 63, Subpart MM. Terms used throughout this section are defined in the Clean Air Act as amended in 1990 and in 40 CFR 63.2 and 63.861. Units and abbreviations are defined in 40 CFR 63.3. [15A NCAC 02D .1111]

At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the owner or operator to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [63.860(d)]

**Emission Limitations** [15A NCAC 02D .1111 and 40 CFR 63.862(a)(1)]

- b. The Permittee shall comply with the emission limitations and operating parameter limits for each affected source given in Table MM-2 above. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the emission limitations or operating parameter limits given in Table MM-2 above are not followed as specified above.

**Testing** [15A NCAC 02D .1111, 40 CFR 63.7, and 40 CFR 63.865]

- c. If emissions testing is required, the testing shall be performed in accordance with the procedures in 40 CFR 63.7, 63.865, and General Condition JJ. If the results of the testing are above any of the limits given in Table MM-2 above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111. The Permittee shall conduct a performance test for each source no later than five years (61 months) after the previous performance test. [40 CFR 63.863(c)]
- d. Per EPA correspondence dated December 26, 2019, the Permittee shall conduct Subpart MM performance testing at the outlet of the No. 4 Lime Kiln ESP (ID No. CD-K4021), not the outlet of the No. 4 Lime Kiln Scrubber (ID No. CD-K4006). If the results of the testing are above any of the limits given in Table MM-2 above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111. [40 CFR 63.865]

**Monitoring** [15A NCAC 02D .1111, and 40 CFR 63.864]

- e. The Permittee shall maintain proper operation of the automatic voltage control (AVC) for each electrostatic precipitator (ID Nos. CD-5RB-ESP and CD-K4021). [40 CFR 63.864(e)(1)]
- f. The Permittee must install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) at the outlet of Recovery Boiler No. 5 ESP (CD-5RB-ESP), and No. 4 Lime Kiln ESP (ID No. CD-K4021) in accordance with Performance Specification 1 (PS-1) in Appendix B to 40 CFR Part 60 and 63.6(h) and 63.8.

Based on performance testing conducted in February 2018, the No. 4 Lime Kiln may be operated while one field of the ESP is down for maintenance and may be operated on natural gas only while three fields of the ESP are down for maintenance. When one field of the ESP is down, No. 4 Lime Kiln throughput shall not exceed 28.33 TCaO/hr. The Permittee shall keep records of the amount of time that the kiln is operated with one or more fields of the ESP down and the fuel combusted during each period.

Based on performance testing conducted in September 2020, Recovery Boiler No. 5 may continue to operate if one side or one field of the ESP is out of service. When one ESP field is out of service, the throughput of Recovery Boiler No. 5 may not exceed 269 kpph BLS. When one side of the ESP is out of service, the throughput of Recovery Boiler No. 5 may not exceed 179 kpph BLS. The Permittee shall keep records of the amount of time the boiler is operated with one side or one field out of service.

The EPA has approved the use of a COMS with a 70 percent opacity full scale value at the Riegelwood Mill (see letter dated December 22, 2003) for Subpart MM compliance. [40 CFR 63.864(d)] In addition:

- i. each COMS must complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period; and
  - ii. as specified in 40 CFR 63.8(g)(2), each 6-minute COMS data average must be calculated as the average of 36 or more data points, equally spaced over each 6-minute period.
- g. Monitoring of pressure drop and scrubbing liquid flow rate on the No. 4 Lime Kiln Scrubber (ID No. CD-K4006) is not required per EPA's approval letter dated December 26, 2019.
  - h. The Permittee shall install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that monitors and records the fan amperage and the scrubbing liquid flow rate for the Nos. 5E and 5W Smelt Dissolving Tank Scrubbers (ID Nos. CD-5EST-1 and CD-5WST-1). Fan amperage and scrubbing liquid flow rate must be monitored at least once every successive 15-minute period using the procedures in 63.8(c). The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be

accurate within  $\pm 5$  percent of the design scrubbing liquid flow rate.

Scrubber liquid flow shall be no less than 136 gpm (3-hour average) for CD-5EST-1 and 136 gpm (3-hour average) for CD-5WST-1. Scrubber fan amps shall be no less than 121 (3-hour average) for CD-5EST-1 and 115 (3-hour average) for CD-5WST-1. [40 CFR 63.864(e)(10)]

- i. Operating limits must be confirmed or reestablished during performance tests. Operating outside a previously established parameter limit during a performance test does not constitute a monitoring exceedance. The Permittee may base operating ranges for the monitoring parameters in condition 2.2 C.1.h on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required in Subpart MM. The Permittee must certify that all control devices and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained. The Permittee may establish expanded or replacement operating ranges per 63.864 or EPA-approved alternate monitoring during subsequent performance tests using the test methods in 63.865. The Permittee must continuously monitor each parameter and determine the hourly arithmetic average value of each parameter during each performance test. Multiple performance tests may be conducted to establish a range of parameter values. The minimum scrubber flow operating limits must be set as the lowest of the 1-hour average flow values associated with each test run demonstrating compliance with the applicable emission limit. The minimum fan amperage operating limit must be set as the midpoint between the lowest of the 1-hour average fan amperage values associated with each test run demonstrating compliance and the no-load amperage value. When revised through performance testing, the monitoring parameter operating ranges in conditions 2.2 C.1.f and h may be modified through an administrative amendment to the permit to reflect the results of the most recent performance test(s). The Permittee shall not use the updated values until the test results are incorporated into the permit. [40 CFR 63.864(j)]
  - j. The Permittee shall implement corrective action if any of the following situations occur during times when spent pulping liquor or lime mud are being fed (as applicable):
    - i. For ES-RB5 or ES-K4001, when the average of ten consecutive 6-minute averages results in a measurement greater than 20 percent opacity [40 CFR 63.864(k)(1)(i)];
    - ii. For ES-ST5E and ES-ST5W, when any 3-hour average scrubber parameter value is below the minimum operating limit in condition 2.2 C.1.h. [40 CFR 63.864(k)(1)(ii)]
  - k. The Permittee shall be in violation of 63.862 if the following monitoring exceedances occur during times when spent pulping liquor or lime mud are being fed (as applicable) [40 CFR 63.864(k)(2)]:
    - i. When opacity is greater than 35 percent (ES-RB5) or 20 percent (ES-K4001) for 2 percent or more of the operating time within any semiannual period;
    - ii. When opacity is greater than 20 percent from ES-LK4001 for 3 percent or more of the operating time within any semiannual period;
    - iii. When six or more instances occur during any 6-month reporting period where the 3-hour average of parameter values associated with ES-ST5E and ES-ST5W are below the minimum values in condition 2.2 C.1.h.
  - l. For purposes of determining the number of non-opacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period. [40 CFR 63.864(k)(3)]
- The Permittee shall be deemed in noncompliance with 02D .1111 if the monitoring procedures specified in Sections 2.2 C.1.e through l are not followed.

**Recordkeeping** [15A NCAC 02D .1111, and 40 CFR 63.866]

- m. The Permittee must maintain records of any occurrence when corrective action is required under condition 2.2 C.1.j, and when a violation is noted under condition 2.2 C.1.k. [40 CFR 63.866(b)]
- n. In addition to the general records required by 63.10(b)(2), the Permittee must maintain records of the following information [40 CFR 63.866(c)]:
  - i. Records of black liquor solids firing rates in units of Mg/d or ton/d for ES-RB5;
  - ii. Records of CaO production rates in units of Mg/d or ton/d for ES-K4001;
  - iii. Records of parameter monitoring data required under conditions 2.2 C.1.f and h, including any period when the operating parameter levels were inconsistent with the levels in conditions 2.2 C.1.f and h., with a brief

explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken;

- iv. Records and documentation of supporting calculations for compliance determinations made under 40 CFR 63.865(a) through (d);
- v. Records of monitoring parameter ranges established under conditions 2.2 C.1.f and h; and
- vi. Records demonstrating compliance with the requirement to maintain proper operation of an ESP's AVC.
- o. The Permittee shall maintain the following records [40 CFR 63.866(d)(1)]:
  - i. In the event that an affected unit fails to meet an applicable standard, including any emission limit in 40 CFR 63.862 or any opacity or CPMS operating limit in 40 CFR 63.864, record the number of failures. For each failure, record the date, start time, and duration.
  - ii. For each failure to meet an applicable standard, record and retain a list of the affected sources or equipment, and the following information:
    - (A) For any failure to meet an emission limit in 40 CFR 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;
    - (B) For each failure to meet an operating limit in 40 CFR 63.864, maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by the Administrator.
    - (C) Record actions taken to minimize emissions in accordance with 40 CFR 63.860(d) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.

The Permittee shall be deemed in noncompliance with 02D .1111 if the records specified in Sections 2.2 C.1.m through o are not maintained.

**Reporting** [15A NCAC 02D .1111, and 40 CFR 63.867]

- p. The Permittee must submit the applicable notifications from 40 CFR 63, Subpart A, as specified in Table 1 of Subpart MM. [40 CFR 63.867(a)]
- q. The Permittee must submit semiannual excess emissions reports containing the information specified in 40 CFR 63.867(c)(1) through (4). All instances of deviations from the requirements of this permit must be clearly identified in the report. Reporting excess emissions below the violation thresholds of condition 2.2 C.1.k does not constitute a violation of the applicable standard. [40 CFR 63.867(c)]
  - i. When no exceedances of parameters have occurred, the Permittee must submit a semiannual report stating that no excess emissions occurred during the reporting period.
  - ii. The Permittee may combine excess emissions and/or summary reports for the facility for Subpart MM and Subpart S.

The Permittee must submit the notifications required in §63.9(b) and §63.9(h) (including any information specified in §63.867(b)) and semiannual reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov>).) The Permittee must upload an electronic copy of each notification in CEDRI beginning with any notification specified in this 40 CFR 63.867(d)(2) that is required after October 11, 2019. The Permittee must use the appropriate electronic report in CEDRI for Subpart MM listed on the CEDRI Web site (<https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri>) for semiannual reports. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the Permittee must submit the report to the Administrator at all the appropriate addresses listed in §63.13. Once the form has been available in CEDRI for 1 year, Permittee must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in Subpart MM, regardless of the method in which the reports are submitted. [§63.867(d)(2)]

- r. Within 60 days after the date of completing each repeat performance test required by Section 2.2 C.1.c, the Permittee shall submit the results of the performance test following the procedures as specified below. [40 CFR 63.867(d)(1)]
  - i. For data collected using test methods supported by the EPA's Electronic Reporting Tool (ERT) as listed on the EPA's ERT Web site (<https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) at

the time of the test, the Permittee must submit the results of the performance test to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX) (<https://cdx.epa.gov/>). Performance test data must be submitted in a file format generated through the use of the EPA's ERT or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the EPA's ERT Web site. If the Permittee claims that some of the performance test information being submitted is confidential business information (CBI), the Permittee must submit a complete file generated through the use of the EPA's ERT or an alternate electronic file format consistent with the XML schema listed on the EPA's ERT Web site, including information claimed to be CBI, on a compact disc, flash drive, or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd, Durham, NC 27703. The same ERT or alternate file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph. [40 CFR 63.867(d)(1)(i)]

**STATE-ONLY REQUIREMENT****E. 15A NCAC 02D .1100: TOXIC AIR POLLUTANT EMISSIONS**

- a. As part of Application No. 2400036.24B, a facility-wide toxics demonstration was received by DAQ on December 13, 2024. Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limits shall not be exceeded:

Model ID No.	Emission Source	Toxic Air Pollutants	Emission Limit		
			lb/year	lb/day	lb/hr
HBLTK1	Heavy Black Liquor Tank 1 (ID No. ES-RX-010)	Acetaldehyde			4.93E+00
		Acrolein			3.69E-04
		Benzene	8.52E-01		
		Carbon Disulfide		3.50E+00	
		Chloroform	1.06E+01		
		Formaldehyde			1.21E-02
		n-Hexane		5.28E-01	
		Hydrogen Sulfide		4.68E+01	
		Methyl Mercaptan			1.19E-01
		Methylene Chloride (1-hour)			7.84E-03
		Methylene Chloride (Annual)	4.49E+01		
		Phenol			8.55E-02
HBLTK2	Heavy Black Liquor Tank 2 (ID No. ES-RX-011)	Acetaldehyde			4.93E+00
		Acrolein			3.69E-04
		Benzene	8.52E-01		
		Carbon Disulfide		3.50E+00	
		Chloroform	1.06E+01		
		Formaldehyde			1.21E-02
		n-Hexane		5.28E-01	
		Hydrogen Sulfide		4.68E+01	
		Methyl Mercaptan			1.19E-01
		Methylene Chloride (1-hour)			7.84E-03
		Methylene Chloride (Annual)	4.49E+01		
		Phenol			8.55E-02
PACKBOIL	Two Package Boilers (ID Nos. ES-PKB1 and ES-PKB2)	Acetaldehyde			9.41E+00
		Arsenic	5.64E+00		
		Benzene	2.58E+01		
		Beryllium	5.05E+01		
		Cadmium	6.89E+01		
		Chromium VI		6.02E-01	
		Formaldehyde			1.34E+00
		n-Hexane		5.74E+03	



Model ID No.	Emission Source	Toxic Air Pollutants	Emission Limit		
			lb/year	lb/day	lb/hr
		Manganese		2.74E+01	
		Mercury		3.19E+00	
		Nickel		2.88E+01	
		Sulfuric Acid (1-hour)			1.82E+00
		Sulfuric Acid (24-hour)		6.41E+01	
PM-18	No. 18 Pulp Dryer (ID No. ES-JJ-030)	Acetaldehyde			5.76E+01
		Acrolein			2.47E+00
		Benzene	1.45E+03		
		Chloroform	2.34E+03		
		Formaldehyde			3.10E+00
		Methyl Mercaptan			1.05E+00
		Methylene Chloride (1-hour)			4.19E+01
		Methylene Chloride (Annual)	2.40E+05		
		Phenol			2.91E+01
FIBER	Heavy Black Liquor Storage Tanks (ID Nos. ES-R0264, ES-R0265, ES-R0266, ES-Z5091, ES-Z5096, and ES-T003)	Acetaldehyde			1.54E+02
		Acrolein			3.70E-01
		Benzene	1.86E+02		
		1,3-Butadiene	2.92E+02		
		Carbon Disulfide		3.34E+01	
		Carbon Tetrachloride	6.72E+04		
		Chloroform	6.72E+03		
		Cresol			2.59E+01
		Ethylene Dichloride	6.22E+03		
		Formaldehyde			1.60E+00
		n-Hexane		7.70E+01	
		Hydrogen Sulfide		3.31E+02	
		Methyl Mercaptan			7.78E-01
		Methylene Chloride (1-hour)			2.53E+00
		Methylene Chloride (Annual)	1.45E+04		
		Phenol			3.16E+00
CAUST	Causticizing Area including Causticizer Sets Nos. 3 and 5 (ID Nos. ES-H-	Ammonia			9.92E+01

Model ID No.	Emission Source	Toxic Air Pollutants	Emission Limit		
			lb/year	lb/day	lb/hr
	325, ES-H-327, ES-H-329, ES-H-332, ES-H-185, and ES-H-184) and Lime Slakers Nos. 3 and 6 (ID Nos. ES-SLK3 and ES-SLK6)				
SVP	SVP Plant No. 3 (ID No. ES-LL-155)	Acetaldehyde			2.82E+00
		Chlorine (1-hour)			3.32E+01
		Chlorine (24-hour)		7.97E+02	
		Chloroform	4.77E+03		
		Methylene Chloride (1-hour)			8.30E-01
		Methylene Chloride (Annual)	4.75E+03		
		Phenol			2.51E-01
WBLTK1	Weak Black Liquor Tank 1 (ID No. ES-T001)	Acetaldehyde			1.07E-01
		Acrolein			5.27E-02
		Benzene	2.01E+01		
		1,3-Butadiene	3.45E+02		
		Carbon Disulfide		7.87E+01	
		Carbon Tetrachloride	1.03E+02		
		Chloroform	1.43E+00		
		Formaldehyde			2.43E-02
		n-Hexane		2.09E+00	
		Hydrogen Sulfide		1.70E+01	
		Methyl Mercaptan			1.40E-01
		Methylene Chloride (1-hour)			6.09E-02
		Methylene Chloride (Annual)	5.33E+02		
WBLTK2	Weak Black Liquor Tank 2 (ID No. ES-T002)	Acetaldehyde			1.07E-01
		Acrolein			5.27E-02
		Benzene	2.01E+01		
		1,3-Butadiene	3.45E+02		
		Carbon Disulfide		7.87E+01	
		Carbon Tetrachloride	1.03E+02		
		Chloroform	1.43E+00		
		Formaldehyde			2.43E-02

Model ID No.	Emission Source	Toxic Air Pollutants	Emission Limit		
			lb/year	lb/day	lb/hr
		n-Hexane		2.09E+00	
		Hydrogen Sulfide		1.70E+01	
		Methyl Mercaptan			1.40E-01
		Methylene Chloride (1-hour)			6.09E-02
		Methylene Chloride (Annual)	5.33E+02		
BIGMWBL	Big M Weak Black Liquor Tank (ID No. ES-G96)	Acetaldehyde			1.07E-01
		Acrolein			5.27E-02
		Benzene	2.01E+01		
		1,3-Butadiene	3.45E+02		
		Carbon Disulfide		7.87E+01	
		Carbon Tetrachloride	1.03E+02		
		Chloroform	1.43E+00		
		Formaldehyde			2.43E-02
		n-Hexane		2.09E+00	
		Hydrogen Sulfide		1.70E+01	
		Methyl Mercaptan			1.40E-01
		Methylene Chloride (1-hour)			6.09E-02
		Methylene Chloride (Annual)	5.33E+02		
WWTP	Wastewater Collection and Treatment (ID No. ES-WWTS)	Acetaldehyde			1.56E+02
		Ammonia			3.57E-01
		Chloroform	2.08E+04		
		Cresol			2.14E-02
		Formaldehyde			5.73E-02
		Phenol			2.60E-02

**F. Lime Kiln No. 4 (ID No. ES-K4001)**

The following table provides a summary of limits and standards for the emission source(s) described above:

<b>Pollutant</b>	<b>Limits/Standards</b>	<b>Applicable Regulation</b>
Nitrogen Oxides	Less than a total of 402.75 tons per consecutive twelve month period.	15A NCAC 02Q .0317 (15A NCAC 02D .0530 Avoidance)

**1. 15A NCAC 02Q. 0317: AVOIDANCE CONDITIONS for  
15A NCAC 02D. 0530: PREVENTION OF SIGNIFICANT DETERIORATION**

- a. In order to avoid applicability of 15A NCAC 02D .0530(g) for major sources and major modifications, the Lime Kiln (ID No. ES-K4001) shall discharge into the atmosphere less 402.75 tons of nitrogen oxides per consecutive twelve month period.

**Testing** [15A NCAC 02Q .0508(f)]

- b. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test are above the limit given in Section 2.2 F.1.a (ID Nos. ES-K4001) above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530.

**Monitoring/ Recordkeeping** [15A NCAC 02Q .0508(f)]

- c. The Permittee shall not exceed a maximum of 402.75 tons of Nitrogen Oxides total for the No. 4 Lime Kiln (ID No. ES-K4001), per consecutive twelve (12) month period. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if the NOx emissions exceed this limit.
- d. To ensure compliance, the Permittee shall record and maintain records of the NOx emissions from the No. 4 Lime Kiln (ID No. ES-K4001) during each month. The record of the NOx emissions during each month shall be made available to an authorized representative of DAQ upon request. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .0530 if these records are not maintained.

**Reporting** [15A NCAC 02Q .0508(f)]

- e. The Permittee shall submit a summary report of the monitoring and recordkeeping postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. The report shall contain the following:
- the monthly NOx emissions from the No. 4 Lime Kiln (ID No. ES-K4001) for the previous 17 months. The total NOx emissions must be calculated for each of the 12-month periods over the previous 17 months.
  - All instances of deviations from the requirements of this permit must be clearly identified.

## G. Facility-Wide

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Toxic Air Pollutants	<b>State-enforceable only</b> – fuel oil equivalency requirements	15A NCAC 02D .1100 <b>AVOIDANCE</b>

### STATE-ONLY REQUIREMENT

#### 1. **15A NCAC 02Q. 0317: AVOIDANCE CONDITIONS for 15A NCAC 02D .1100: TOXIC AIR POLLUTANT EMISSIONS**

To avoid the requirements of 15A NCAC 02D .1100, the Permittee may:

Burn spilled oil cleanup residue from this site absorbed onto biomass in Power Boiler Nos. 2 and 5, provided that the absorbed waste oil does not exceed the ASTM specifications of unadulterated No. 6 fuel oil; and

Use on-specification used No. 4 fuel oil in Power Boiler No. 5. The on-specification No. 4 fuel oil must be supplied by a DAQ-approved vendor as follows.

- a. **Specifications** - The on-specification used No. 4 fuel oil shall be equivalent to unadulterated fossil fuel by meeting the following criteria:

Constituent/Property	Allowable Level
Arsenic	1 ppm maximum
Cadmium	2 ppm maximum
Chromium	5 ppm maximum
Lead	100 ppm maximum
Total Halogens	1000 ppm maximum
Flash Point	130 degrees F minimum
Sulfur	2.0% maximum (by weight)
Ash	1.0% maximum

The Permittee is responsible for ensuring that the on-specification used No. 4 fuel oil meets the approved criteria for unadulterated fuel. The Permittee is held responsible for any discrepancies discovered by DAQ as a result of any sampling and analysis of the fuel oil.

- b. **Testing Requirement** - The Permittee shall analyze the No. 4 fuel oil for the Constituents listed in the table above annually.
- c. **Recordkeeping Requirements** - The Permittee shall maintain at the facility for a minimum of three years, and shall make available to representatives of the DAQ upon request, accurate records of the following:
- the actual amount of on-specification used No. 4 fuel oil delivered to, and/or combusted at the facility on an annual basis.
  - the results of any analytical testing of the on-specification used No. 4 fuel oil or the oil blend as it is sampled and tested by the Permittee or vendor.
  - type and amount of biomass absorbed oil residue burned on an annual basis.
- d. **Reporting Requirements** - Within 30 days after each calendar year, the Permittee shall submit in writing to the Regional Supervisor, DAQ, the following:
- a summary of the results of the annual analytical testing of the constituents in the No. 4 fuel oil.
  - the total gallons of on-specification used No. 4 fuel oil from each approved vendor combusted at the facility for the previous 12 months.
- e. The DAQ reserves the right to require additional testing and/or monitoring of the on-specification used No. 4 fuel oil without notice.

## H. Reserved

### I. No. 2 Power Boiler (ID No. ES-PB2) and No. 5 Power Boiler (ID No. ES-PB5)

The following table provides a summary of limits and standards for the emission source(s) described above:

Pollutant	Limits/Standards	Applicable Regulation
Hazardous Air Pollutants	2.2E-02 lb HCl per million Btu of heat input	15A NCAC 02D .1111 [40 CFR Part 63, Subpart DDDDD]
	5.7E-06 lb Hg per million Btu of heat input	
	3,500 parts per million CO on a dry basis corrected to 3 percent oxygen, 3-run average	
	4.4E-01 lb filterable PM per million Btu of heat input	

#### 1. 15A NCAC 02D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY

**Applicability** [§§63.7485, 63.7490(d), 63.7499(h)]

- a. For the existing Nos. 2 and 5 Power Boilers (**ID Nos. ES-PB2 and ES-PB5**), the Permittee shall comply with all applicable provisions for hybrid suspension grate boilers (as defined in 40 CFR 63.7575), including the monitoring, recordkeeping, and reporting contained in Environmental Management Commission Standard 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT) as promulgated in 40 CFR 63, Subpart DDDDD "National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters" (Subpart 5D) and Subpart A "General Provisions."

**Definitions and Nomenclature** [§63.7575]

- b. For the purpose of this permit condition, the definitions and nomenclature contained in 40 CFR 63.7575 shall apply.

**40 CFR Part 63 Subpart A General Provisions** [§63.7565]

- c. The Permittee shall comply with the requirements of 40 CFR 63 Subpart A General Provisions according to the applicability of Subpart A to such sources as identified in Table 10 to Subpart 5D.

**Compliance Date** [§§63.7510(e), 63.56(b)]

- d. The Permittee shall:
  - i. Complete the initial tune up and the one-time energy assessment as required in Section 2.2 I.1.q through u no later than May 20, 2019.
  - ii. Complete the initial compliance requirements in Section 2.2 I.1.j no later than November 16, 2019 and according to the applicable provisions in §63.7(a)(2).

**General Compliance Requirements** [§§63.7505(a), 63.7500]

- e. At all times the affected unit(s) is operating, the Permittee shall be in compliance with the emission standards in Section 2.2 I.1.g, except during periods of startup and shutdown. During startup and shutdown, the Permittee shall comply only with items 5 and 6 of Table 3 of Subpart 5D.
- f. At all times, then Permittee shall operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

**Emission Limits** [15A NCAC 02Q .0508(f), §63.7500(a)(1), Table 2, Table 15]

- g. The affected unit(s) shall meet the following emission limits until October 6, 2025:

Pollutant	Emission Limit
Hydrochloric Acid (HCl)	2.2E-02 pounds per million Btu of heat input
Mercury (Hg)	5.7E-06 pounds per million Btu of heat input
Carbon monoxide (CO)	3,500 ppm by volume on a dry basis corrected to 3 percent oxygen, 3 run average
Filterable Particulate Matter (PM)	4.4E-01 pounds per million Btu of heat input

On and after October 6, 2025, the affected unit(s) shall meet the following emission limits:

Pollutant	Emission Limit
Hydrochloric Acid (HCl)	2.0E-02 pounds per million Btu of heat input
Mercury (Hg)	5.4E-06 pounds per million Btu of heat input
Carbon monoxide (CO)	3,500 ppm by volume on a dry basis corrected to 3 percent oxygen, 3 run average
Filterable Particulate Matter (PM)	4.4E-01 pounds per million Btu of heat input

**Testing** [15A NCAC 02Q .0508(f)]

- h. If emissions testing is required, the testing shall be performed in accordance with General Condition JJ. If the results of this test(s) are above the limit given in Section 2.2 I.1.g above, the Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111.

**Notifications** [15A NCAC 02Q .0508(f), §§63.7545(d), 63.7530]

- i. The Permittee shall submit the following notifications:
- The Permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin.
  - For the compliance demonstration for each affected source, the Permittee shall submit all performance test results and fuel analyses, before the close of business on the 60th day following the completion of all performance test and/or other compliance demonstrations for all affected sources at the facility. A revised Notification of Compliance Status report must be submitted with the compliance demonstration results if there is a change in compliance methodology and must contain all the information specified in paragraphs (e)(1) through (8) of §63.7545 as applicable.

[§§63.9(h)(2)(ii), 63.10(d)(2), 63.7545(e)]

The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these notification requirements are not met.

**Initial compliance requirements** [15A NCAC 02Q .0508(f), §63.7510]

- j. The Permittee shall demonstrate compliance with the limits in Section 2.2 I.1.g by conducting initial performance test(s) and fuel analyses, establishing operating limits and conducting continuous monitoring system (CMS) evaluation(s) as necessary according to §§63.7510, 63.7525 and 63.7530. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

**Continuous compliance requirements** [15A NCAC 02Q .0508(f), §63.7515]

- The Permittee shall conduct subsequent performance tests and fuel analyses as necessary according to §63.7515.
- The Permittee shall demonstrate continuous compliance with each emission limit and operating limit that applies according to §63.7540.
  - The 30-day rolling average scrubbing liquid flow rate shall be maintained at or above 1,500 gpm and the 30-day rolling average pressure drop shall be maintained at or above 4.4 inches H<sub>2</sub>O for the No. 2 Power Boiler scrubber.
  - The 30-day rolling average scrubbing liquid flow rate shall be maintained at or above 1,300 gpm and the 30-day rolling average pressure drop shall be maintained at or above 13.1 inches H<sub>2</sub>O for the No. 5 Power Boiler scrubber.
- The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.2 I.1.k through l are not met.

**Monitoring requirements** [15A NCAC 02Q .0508(f), §63.7505, §63.7525]

- The Permittee shall install, operate, and maintain an oxygen analyzer system, as defined in §63.7575, according to the procedures in §63.7525(a).
- The Permittee shall develop a site-specific monitoring plan according to §63.7505(d) and shall meet the

requirements for all monitoring systems as applicable according to §§63.7525 and 63.7535.

- p. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.2 I.1.n through o are not met.

**Work Practice Standards** [15A NCAC 02Q .0508(f)]

- q. The Permittee shall conduct a tune-up of the source(s) annually as specified below. The Permittee shall conduct the tune-up while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the tune-up.
  - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the Permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown);
  - ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
  - iv. Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject; and
  - v. Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.
- [§§63.7500(a), 63.7540(a)(10)]
- r. Each tune-up shall be conducted no more than 13 months after the previous tune-up. [§63.7515(d)]
- s. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [§§63.7540(a)(13), 63.7515(g)]
- t. Startup Requirements. The Permittee shall comply with all applicable emission limits at all times except during startup and shutdown periods. During startup, the Permittee shall meet the work practice requirements below. [40 CFR 63.7500 and Table 3 of 40 CFR Part 63, Subpart DDDDD]
  - i. All CMS shall be operated during startup.
  - ii. For startup of the Nos. 2 and 5 Power Boilers (**ID Nos. ES-PB2 and ES-PB5**), one or a combination of the following clean fuels shall be used: Natural gas, synthetic natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, liquefied petroleum gas, clean dry biomass, and any fuels meeting the appropriate HCl, mercury and TSM emission standards by fuel analysis.
  - iii. The Permittee has the option of complying using either of the following work practice standards.
    - (A) If complying using definition (1) of "startup" in 40 CFR 63.7575, once the Permittee starts firing fuels that are not clean fuels, the Permittee shall vent emissions to the main stack(s) and engage all of the applicable control devices. Startup ends when steam or heat is supplied for any purpose, OR
    - (B) If complying using definition (2) of "startup" in 40 CFR 63.7575, once the Permittee starts to feed fuels that are not clean fuels, the Permittee shall vent emissions to the main stack(s) and engage all of the applicable control devices so as to comply with the emission limits within 4 hours of start of supplying useful thermal energy. The Permittee shall engage and operate PM control within one hour of first feeding fuels that are not clean fuels. The Permittee shall start all applicable control devices as expeditiously as possible, but, in any case, when necessary to comply with other standards applicable to the source by a permit limit or a rule other than this section that require operation of the control devices. The Permittee shall develop and implement a written startup and shutdown plan, as specified in 40 CFR 63.7505(e).
  - iv. The Permittee shall collect monitoring data during periods of startup, as specified in 40 CFR 63.7535(b).
  - v. The Permittee shall keep records during periods of startup.
- u. Shutdown Requirements. The Permittee shall comply with all applicable emission limits at all times except during startup and shutdown periods. The Permittee shall meet the shutdown work practice requirements below. [40 CFR 63.7500 and Table 3 of 40 CFR Part 63, Subpart DDDDD]
  - i. The Permittee shall operate all CMS during shutdown.
  - ii. While firing fuels that are not clean fuels during shutdown, the Permittee shall vent emissions to the main stack(s) and operate all applicable control devices when necessary to comply with other standards applicable to the source that require operation of the control device.
  - iii. If, in addition to the fuel used prior to initiation of shutdown, another fuel must be used to support the shutdown process, that additional fuel must be one or a combination of the following clean fuels: Natural gas, synthetic



- natural gas, propane, other Gas 1 fuels, distillate oil, syngas, ultra-low sulfur diesel, refinery gas, and liquefied petroleum gas.
- iv. The Permittee shall collect monitoring data during periods of shutdown, as specified in 40 CFR 63.7535(b).
  - v. The Permittee shall keep records during periods of shutdown.
  - v. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.2 I.1.q through u are not met.

**Energy Assessment Requirements** [15A NCAC 02Q .0508(f)]

- w. The Permittee shall have a one-time energy assessment performed by a qualified energy assessor. The energy assessment must address the requirements in 40 CFR 63 Subpart DDDDD, Table 3, with the extent of the evaluation for items (a) to (e) in Table 3 appropriate for the on-site technical hours listed in §63.7575. [§63.7500(a)(1), Table 3] The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if these requirements are not met.

**Recordkeeping Requirements** [15A NCAC 02Q .0508(f), §63.7555]

- x. The Permittee shall:
  - i. Keep a copy of each notification and report submitted to comply with Subpart 5D, including all documentation supporting any Initial Notification or Notification of Compliance Status, or semiannual compliance report that has been submitted.  
[§63.7555(a)(1), 63.10(b)(2)(xiv)]
  - ii. Keep records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations. [§63.10(b)(2)(viii)]
  - iii. Maintain on-site and submit, if requested by the Administrator, tune-up reports containing the information in paragraphs (A) through (C) below:
    - (A) The concentrations of carbon monoxide in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
    - (B) A description of any corrective actions taken as a part of the tune-up; and
    - (C) the type and amount of fuel used over the 12 months prior to the adjustment, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.  
[§63.7540(a)(10)(vi)]
  - iv. For each CEMS, COMS, and continuous monitoring system, keep records according to paragraphs (b)(1) through (5) of §63.7555.
  - v. Keep records required in Table 8 of Subpart 5D including records of all monitoring data and calculated averages for applicable operating limits, such as opacity, pressure drop, pH, and operating load, to show continuous compliance with each emission limit and operating limit that applies.
  - vi. Keep the applicable records in paragraphs (d)(1) through (13) of §63.7555.
- y. The Permittee shall:
  - i. Maintain records in a form suitable and readily available for expeditious review;
  - ii. Keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
  - iii. Keep each record on site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record. The Permittee can keep the records offsite for the remaining 3 years.  
[§63.7560, §63.10(b)(1)]
- z. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.2 I.1.x through y are not met.

**Reporting Requirements** [15A NCAC 02Q .0508(f), §63.7550]

- aa. The Permittee shall submit a compliance report to the DAQ on a semi-annual basis, postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June.
  - i. The compliance reports shall also be submitted electronically to the EPA via the procedures in §63.7550(h).
- bb. The compliance report shall contain:
  - i. The information in §63.7550(c) as applicable.
  - ii. For each deviation from an emission limit or operating limit, the report shall contain the information in §63.7550(d) and (e) as applicable.
- cc. Within 60 days after the date of completing each performance test (defined in §63.2) including any associated fuel

analyses and/or CEMS performance evaluation (defined in §63.2) as required by Subpart 5D, the Permittee shall submit the results to the DAQ pursuant to 63.10(d)(2) and to the EPA via the procedures in §63.7550(h).

- dd. The Permittee shall be deemed in noncompliance with 15A NCAC 02D .1111 if the requirements in Section 2.2 I.1.aa through cc are not met.

**State Enforceable-Only Requirement**

**J. 15A NCAC 02D .1806: CONTROL AND PROHIBITION OF ODOROUS EMISSIONS**

- a. The Permittee shall not operate the facility without implementing management practices or installing and operating odor control equipment sufficient to prevent odorous emissions, from the facility from causing or contributing to objectionable odors beyond the facility's boundary. The requirements of this rule do not apply to processes at kraft pulp mills identified in 15A NCAC 02D .0528, and covered under 15A NCAC 02D .0524 or 15A NCAC 02D .0528.

**K. Reserved**

**L. Recovery Boiler No. 5 (ID No. ES-RB5)**

**1. 15A NCAC 02D .0530(u): USE OF PROJECTED ACTUAL EMISSIONS**

- a. The Permittee has used projected actual emissions to avoid applicability of prevention of significant deterioration requirements for the project consisting of the modified No. 5 Recovery Furnace (ID No. ES-RB5) [Application No. 2400036.22A].

**Monitoring/Recordkeeping/Reporting** [15A NCAC 02Q .0308(a)]

- b. No monitoring/recordkeeping/reporting is required.

### SECTION 3 - INSIGNIFICANT ACTIVITIES PER 15A NCAC 02Q .0503(8)

Emission Source ID No.	Emission Source Description <sup>1,2</sup>
IES-AHS	Ash Handling System
IES-ALS	Ash Loading System
IES-ST	Soap Tanks
IES-MLL	Methanol Line Losses
IES-LF	Landfills
IES-CT	Cooling Towers
IES-PMAT	Pulp Dryer Additive Tanks; No. 18 Repulper
IES-RB5CRS	No. 5 Recovery Boiler Chloride Removal System
IES-Z6060 and IES- Z5073	Evaporator Boilout Tanks
IES-PMTKS	Various small tanks and drums containing petroleum products with capacity less than 10,000 gallons each in the paper machines area
IES-PRTKS	Various small tanks and drums containing petroleum products with capacity less than 10,000 gallons each in the power and recovery area
IES-1FOST	No. 1 #2 fuel oil storage tank (846,000 gallons) in power and recovery area (non-Kb tank)
IES-2FOST	No. 2 #2 fuel oil storage tank (1,050,000 gallons) in power and recovery area (non-Kb tank)
IES-PBDT	No. 6 fuel oil day tank East of power boilers (50,000 gallons) – non-Kb tank
IES-GFOST	No. 2 Fuel oil storage tank (10,600 gallons) in power and recovery area
IES-PBTKS	Various small tanks and drums containing petroleum products with capacity less than 10,000 gallons each in the pulping and bleaching areas
IES-TURP	28,000-gallon turpentine storage tank East of Kamyr Digester
IES-JA-037	8,000-gallon ammonia storage tank
IES-WYTKS	Various small tanks and drums containing petroleum products with capacity less than or equal to 10,000 gallons each in the woodyard area (non-Kb tanks)
IES-WTSAT	16,000 gallon Wastewater Treatment System Ammonia Tank
IES-WTSAT2	6,300 gallon Wastewater Treatment System Nitrate Solution Tank
IES-WWTKS	Various small tanks and drums containing petroleum products with capacity less than or equal to 10,000 gallons each in the wastewater treatment, construction yard, and dock areas (non-Kb tanks)
IES-EE2 and IES-EE3 <b>MACT ZZZZ</b>	No. 4 Lime Kiln diesel-fired auxiliary engine (377 hp) and Diesel-fired emergency fire pump (290 hp)

<sup>1</sup> Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement (Federal or State) or that the Permittee is exempted from demonstrating compliance with any applicable requirement.

<sup>2</sup> When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 02D .1100 “Control of Toxic Air Pollutants” or 02Q .0711 “Emission Rates Requiring a Permit.”

## SECTION 4 - GENERAL CONDITIONS (version 8.0, 07/10/2024)

This section describes terms and conditions applicable to this Title V facility.

A. **General Provisions** [NCGS 143-215 and 15A NCAC 02Q .0508(i)(16)]

1. Terms not otherwise defined in this permit shall have the meaning assigned to such terms as defined in 15A NCAC 02D and 02Q.
2. The terms, conditions, requirements, limitations, and restrictions set forth in this permit are binding and enforceable pursuant to NCGS 143-215.114A and 143-215.114B, including assessment of civil and/or criminal penalties. Any unauthorized deviation from the conditions of this permit may constitute grounds for revocation and/or enforcement action by the DAQ.
3. This permit is not a waiver of or approval of any other Department permits that may be required for other aspects of the facility which are not addressed in this permit.
4. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted facility, or from penalties therefore, nor does it allow the Permittee to cause pollution in contravention of state laws or rules, unless specifically authorized by an order from the North Carolina Environmental Management Commission.
5. Except as identified as state-only requirements in this permit, all terms and conditions contained herein shall be enforceable by the DAQ, the EPA, and citizens of the United States as defined in the Federal Clean Air Act.
6. Any stationary source of air pollution shall not be operated, maintained, or modified without the appropriate and valid permits issued by the DAQ, unless the source is exempted by rule. The DAQ may issue a permit only after it receives reasonable assurance that the installation will not cause air pollution in violation of any of the applicable requirements. A permitted installation may only be operated, maintained, constructed, expanded, or modified in a manner that is consistent with the terms of this permit.

B. **Permit Availability** [15A NCAC 02Q .0507(k) and .0508(i)(9)(B)]

The Permittee shall have available at the facility a copy of this permit and shall retain for the duration of the permit term one complete copy of the application(s) and any information submitted in support of the application package. The permit and application shall be made available to an authorized representative of the Department of Environmental Quality upon request.

C. **Severability Clause** [15A NCAC 02Q .0508(i)(2)]

In the event of an administrative challenge to a final and binding permit in which a condition is held to be invalid, the provisions in this permit are severable so that all requirements contained in the permit, except those held to be invalid, shall remain valid and must be complied with.

D. **Submissions** [15A NCAC 02Q .0507(e) and 02Q .0508(i)(16)]

Except as otherwise specified herein, one copy of all documents, reports, test data, monitoring data, notifications, request for renewal, and any other information required by this permit shall be submitted to the appropriate Regional Office. Refer to the Regional Office address on the cover page of this permit. For continuous emissions monitoring systems (CEMS) reports, continuous opacity monitoring systems (COMS) reports, quality assurance (QA)/quality control (QC) reports, acid rain CEM certification reports, and NOx budget CEM certification reports, one copy shall be sent to the appropriate Regional Office and one copy shall be sent to:

Supervisor, Stationary Source Compliance  
North Carolina Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

All submittals shall include the facility name and Facility ID number (refer to the cover page of this permit).

E. **Duty to Comply** [15A NCAC 02Q .0508(i)(3)]

The Permittee shall comply with all terms, conditions, requirements, limitations and restrictions set forth in this permit. Noncompliance with any permit condition except conditions identified as state-only requirements constitutes a violation of the Federal Clean Air Act. Noncompliance with any permit condition is grounds for enforcement action, for permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application.

F. **Circumvention** - STATE ENFORCEABLE ONLY

The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air pollution control device(s) and appurtenances.

G. **Title V Permit Modifications**

1. Administrative Permit Amendments [15A NCAC 02Q .0514]  
The Permittee shall submit an application for an administrative permit amendment in accordance with 15A NCAC 02Q .0514.
2. Transfer in Ownership or Operation and Application Submittal Content [15A NCAC 02Q .0524 and 02Q .0505]  
The Permittee shall submit an application for an ownership change in accordance with 15A NCAC 02Q.0524 and 02Q .0505.
3. Minor Permit Modifications [15A NCAC 02Q .0515]  
The Permittee shall submit an application for a minor permit modification in accordance with 15A NCAC 02Q .0515.
4. Significant Permit Modifications [15A NCAC 02Q .0516]  
The Permittee shall submit an application for a significant permit modification in accordance with 15A NCAC 02Q .0516.
5. Reopening for Cause [15A NCAC 02Q .0517]  
The Permittee shall submit an application for reopening for cause in accordance with 15A NCAC 02Q .0517.

H. **Changes Not Requiring Permit Modifications**

1. Reporting Requirements [15A NCAC 02Q .0508(f)]  
Any of the following that would result in new or increased emissions from the emission source(s) listed in Section 1 must be reported to the Regional Supervisor, DAQ:
  - a. changes in the information submitted in the application;
  - b. changes that modify equipment or processes; or
  - c. changes in the quantity or quality of materials processed.If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.
2. Section 502(b)(10) Changes [15A NCAC 02Q .0523(a)]
  - a. "Section 502(b)(10) changes" means changes that contravene an express permit term or condition. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.
  - b. The Permittee may make Section 502(b)(10) changes without having the permit revised if:
    - i. the changes are not a modification under Title I of the Federal Clean Air Act;
    - ii. the changes do not cause the allowable emissions under the permit to be exceeded;
    - iii. the Permittee notifies the Director and EPA with written notification at least seven days before the change is made; and
    - iv. the Permittee shall attach the notice to the relevant permit.
  - c. The written notification shall include:
    - i. a description of the change;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - d. Section 502(b)(10) changes shall be made in the permit the next time that the permit is revised or renewed, whichever comes first.
3. Off Permit Changes [15A NCAC 02Q .0523(b)]  
The Permittee may make changes in the operation or emissions without revising the permit if:
  - a. the change affects only insignificant activities and the activities remain insignificant after the change; or
  - b. the change is not covered under any applicable requirement.
4. Emissions Trading [15A NCAC 02Q .0523(c)]  
To the extent that emissions trading is allowed under 15A NCAC 02D, including subsequently adopted maximum achievable control technology standards, emissions trading shall be allowed without permit revision pursuant to 15A NCAC 02Q .0523(c).

**I.A. Reporting Requirements for Excess Emissions** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. **"Excess Emissions"** - means an emission rate that exceeds any applicable emission limitation or standard allowed by any rule in Sections .0500, .0900, .1200, or .1400 of Subchapter 02D; or by a permit condition; or that exceeds an emission limit established in a permit issued under 15A NCAC 02Q .0700. *(Note: Definitions of excess emissions under 02D .1110 and 02D .1111 shall apply where defined by rule.)*
2. If a source is required to report excess emissions under NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or the operating permit provides for periodic (e.g., quarterly) reporting of excess emissions, reporting shall be performed as prescribed therein.
3. If the source is not subject to NSPS (15A NCAC 02D .0524), NESHAPS (15A NCAC 02D .1110 or .1111), or these rules do NOT define "excess emissions," the Permittee shall report excess emissions in accordance with 15A NCAC 02D .0535 as follows:
  - a. Pursuant to 15A NCAC 02D .0535, if excess emissions last for more than four hours resulting from a malfunction, a breakdown of process or control equipment, or any other abnormal condition, the owner or operator shall:
    - i. notify the Regional Supervisor or Director of any such occurrence by 9:00 a.m. Eastern Time of the Division's next business day of becoming aware of the occurrence and provide:
      - name and location of the facility;
      - nature and cause of the malfunction or breakdown;
      - time when the malfunction or breakdown is first observed;
      - expected duration; and
      - estimated rate of emissions;
    - ii. notify the Regional Supervisor or Director immediately when corrective measures have been accomplished; and
    - iii. submit to the Regional Supervisor or Director within 15 days a written report as described in 15A NCAC 02D .0535(f)(3).

**I.B. Reporting Requirements for Permit Deviations** [15A NCAC 02D .0535(f) and 02Q .0508(f)(2)]

1. **"Permit Deviations"** - for the purposes of this condition, any action or condition not in accordance with the terms and conditions of this permit including those attributable to upset conditions as well as excess emissions as defined above lasting less than four hours.
2. Pursuant to 15A NCAC 02Q .0508(f)(2), the Permittee shall report deviations from permit requirements (terms and conditions) quarterly by notifying the Regional Supervisor or Director of all other deviations from permit requirements not covered under 15A NCAC 02D .0535. A written report to the Regional Supervisor shall include the probable cause of such deviation and any corrective actions or preventative actions taken. The responsible official shall certify all deviations from permit requirements.

**I.C. Other Requirements under 15A NCAC 02D .0535**

The Permittee shall comply with all other applicable requirements contained in 15A NCAC 02D .0535, including 15A NCAC 02D .0535(c) as follows:

1. Any excess emissions that do not occur during start-up and shut-down shall be considered a violation of the appropriate rule unless the owner or operator of the sources demonstrates to the Director that the excess emissions are a result of a malfunction. The Director shall consider, along with any other pertinent information, the criteria contained in 15A NCAC 02D .0535(c)(1) through (7).
2. 15A NCAC 02D .0535(g). Excess emissions during start-up and shut-down shall be considered a violation of the appropriate rule if the owner or operator cannot demonstrate that excess emissions are unavoidable.

**J. RESERVED**

**K. Permit Renewal** [15A NCAC 02Q .0508(e) and 02Q .0513(b)]

This 15A NCAC 02Q .0500 permit is issued for a fixed term not to exceed five years and shall expire at the end of its term. Permit expiration terminates the facility's right to operate unless a complete 15A NCAC 02Q .0500 renewal application is submitted at least six months before the date of permit expiration. If the Permittee or applicant has complied with 15A NCAC 02Q .0512(b)(1), this 15A NCAC 02Q .0500 permit shall not expire until the renewal permit has been issued or denied. Permit expiration under 15A NCAC 02Q .0400 terminates the facility's right to operate unless a complete 15A NCAC 02Q .0400 renewal application is submitted at least six months before the date of permit expiration for facilities subject to 15A NCAC 02Q .0400 requirements. In either of these events, all terms and conditions of these permits shall remain in effect until the renewal permits have been issued or denied.

L. **Need to Halt or Reduce Activity Not a Defense** [15A NCAC 02Q .0508(i)(4)]

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

M. **Duty to Provide Information (submittal of information)** [15A NCAC 02Q .0508(i)(9)]

1. The Permittee shall furnish to the DAQ, in a timely manner, any reasonable information that the Director may request in **writing** to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.
2. The Permittee shall furnish the DAQ copies of records required to be kept by the permit when such copies are requested by the Director. For information claimed to be confidential, the Permittee may furnish such records directly to the EPA upon request along with a claim of confidentiality.

N. **Duty to Supplement** [15A NCAC 02Q .0507(f)]

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the DAQ. The Permittee shall also provide additional information as necessary to address any requirement that becomes applicable to the facility after the date a complete permit application was submitted but prior to the release of the draft permit.

O. **Retention of Records** [15A NCAC 02Q .0508(f) and 02Q .0508(l)]

The Permittee shall retain records of all required monitoring data and supporting information for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring information, and copies of all reports required by the permit. These records shall be maintained in a form suitable and readily available for expeditious inspection and review. Any records required by the conditions of this permit shall be kept on site and made available to DAQ personnel for inspection upon request.

P. **Compliance Certification** [15A NCAC 02Q .0508(n)]

The Permittee shall submit to the DAQ and the EPA (Air Enforcement Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) postmarked on or before March 1 a compliance certification (for the preceding calendar year) by a responsible official with all terms and conditions in the permit (including emissions limitations, standards, or work practices), except for conditions identified as being State-enforceable Only. It shall be the responsibility of the current owner to submit a compliance certification for the entire year regardless of who owned the facility during the year. The compliance certification shall comply with additional requirements as may be specified under Sections 114(a)(3) or 504(b) of the Federal Clean Air Act. The compliance certification shall specify:

1. the identification of each term or condition of the permit that is the basis of the certification;
2. the compliance status (with the terms and conditions of the permit for the period covered by the certification);
3. whether compliance was continuous or intermittent;
4. the method(s) used for determining the compliance status of the source during the certification period;
5. each deviation and take it into account in the compliance certification; and
6. as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (CAM) occurred.

Q. **Certification by Responsible Official** [15A NCAC 02Q .0520]

A responsible official shall certify the truth, accuracy, and completeness of any application form, report, or compliance certification required by this permit. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

R. **Permit Shield for Applicable Requirements** [15A NCAC 02Q .0512]

1. Compliance with the terms and conditions of this permit shall be deemed compliance with applicable requirements, where such applicable requirements are included and specifically identified in the permit as of the date of permit issuance.
2. A permit shield shall not alter or affect:
  - a. the power of the Commission, Secretary of the Department, or Governor under NCGS 143-215.3(a)(12), or EPA under Section 303 of the Federal Clean Air Act;
  - b. the liability of an owner or operator of a facility for any violation of applicable requirements prior to the effective date of the permit or at the time of permit issuance;
  - c. the applicable requirements under Title IV; or



- d. the ability of the Director or the EPA under Section 114 of the Federal Clean Air Act to obtain information to determine compliance of the facility with its permit.
3. A permit shield does not apply to any change made at a facility that does not require a permit or permit revision made under 15A NCAC 02Q .0523.
4. A permit shield does not extend to minor permit modifications made under 15A NCAC 02Q .0515.

S. **Termination, Modification, and Revocation of the Permit** [15A NCAC 02Q .0519]

The Director may terminate, modify, or revoke and reissue this permit if:

1. the information contained in the application or presented in support thereof is determined to be incorrect;
2. the conditions under which the permit or permit renewal was granted have changed;
3. violations of conditions contained in the permit have occurred;
4. the EPA requests that the permit be revoked under 40 CFR 70.7(g) or 70.8(d); or
5. the Director finds that termination, modification, or revocation and reissuance of the permit is necessary to carry out the purpose of NCGS Chapter 143, Article 21B.

T. **Insignificant Activities** [15A NCAC 02Q .0503]

Because an emission source or activity is insignificant does not mean that the emission source or activity is exempted from any applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement. The Permittee shall have available at the facility at all times and made available to an authorized representative upon request, documentation, including calculations, if necessary, to demonstrate that an emission source or activity is insignificant.

U. **Property Rights** [15A NCAC 02Q .0508(i)(8)]

This permit does not convey any property rights in either real or personal property or any exclusive privileges.

V. **Inspection and Entry** [15A NCAC 02Q .0508(l) and NCGS 143-215.3(a)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the DAQ, or an authorized representative, to perform the following:
  - a. enter the Permittee's premises where the permitted facility is located or emissions-related activity is conducted, or where records are kept under the conditions of the permit;
  - b. have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
  - c. inspect at reasonable times and using reasonable safety practices any source, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - d. sample or monitor substances or parameters, using reasonable safety practices, for the purpose of assuring compliance with the permit or applicable requirements at reasonable times.

Nothing in this condition shall limit the ability of the EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

2. No person shall refuse entry or access to any authorized representative of the DAQ who requests entry for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.

W. **Annual Fee Payment** [15A NCAC 02Q .0508(i)(10)]

1. The Permittee shall pay all fees in accordance with 15A NCAC 02Q .0200.
2. Payment of fees may be by check or money order made payable to the N.C. Department of Environmental Quality. Annual permit fee payments shall refer to the permit number.
3. If, within 30 days after being billed, the Permittee fails to pay an annual fee, the Director may initiate action to terminate the permit under 15A NCAC 02Q .0519.

X. **Annual Emission Inventory Requirements** [15A NCAC 02Q .0207]

The Permittee shall report by **June 30 of each year** the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by a responsible official of the facility.

- Y. **Confidential Information** [15A NCAC 02Q .0107 and 02Q .0508(i)(9)]  
Whenever the Permittee submits information under a claim of confidentiality pursuant to 15A NCAC 02Q .0107, the Permittee may also submit a copy of all such information and claim directly to the EPA upon request. All requests for confidentiality must be in accordance with 15A NCAC 02Q .0107.
- Z. **Construction and Operation Permits** [15A NCAC 02Q .0100 and .0300]  
A construction and operating permit shall be obtained by the Permittee for any proposed new or modified facility or emission source which is not exempted from having a permit prior to the beginning of construction or modification, in accordance with all applicable provisions of 15A NCAC 02Q .0100 and .0300.
- AA. **Standard Application Form and Required Information** [15A NCAC 02Q .0505 and .0507]  
The Permittee shall submit applications and required information in accordance with the provisions of 15A NCAC 02Q .0505 and .0507.
- BB. **Financial Responsibility and Compliance History** [15A NCAC 02Q .0507(d)(3)]  
The DAQ may require an applicant to submit a statement of financial qualifications and/or a statement of substantial compliance history.
- CC. **Refrigerant Requirements (Stratospheric Ozone and Climate Protection)** [15A NCAC 02Q .0501(d)]
  1. If the Permittee has appliances or refrigeration equipment, including air conditioning equipment, which use Class I or II ozone-depleting substances such as chlorofluorocarbons and hydrochlorofluorocarbons listed as refrigerants in 40 CFR Part 82 Subpart A Appendices A and B, the Permittee shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82 Subpart F.
  2. The Permittee shall not knowingly vent or otherwise release any Class I or II substance into the environment during the repair, servicing, maintenance, or disposal of any such device except as provided in 40 CFR Part 82 Subpart F.
  3. The Permittee shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the EPA or its designee as required.
- DD. **Prevention of Accidental Releases - Section 112(r)** [15A NCAC 02Q .0508(h)]  
If the Permittee is required to develop and register a Risk Management Plan with EPA pursuant to Section 112(r) of the Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.
- EE. **National Emission Standards Asbestos – 40 CFR Part 61, Subpart M** [15A NCAC 02D .1110]  
The Permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.
- FF. **Title IV Allowances** [15A NCAC 02Q .0508(i)(1)]  
This permit does not limit the number of Title IV allowances held by the Permittee, but the Permittee may not use allowances as a defense to noncompliance with any other applicable requirement. The Permittee's emissions may not exceed any allowances that the facility lawfully holds under Title IV of the Federal Clean Air Act.
- GG. **Air Pollution Emergency Episode** [15A NCAC 02D .0300]  
Should the Director of the DAQ declare an Air Pollution Emergency Episode, the Permittee will be required to operate in accordance with the Permittee's previously approved Emission Reduction Plan or, in the absence of an approved plan, with the appropriate requirements specified in 15A NCAC 02D .0300.
- HH. **Registration of Air Pollution Sources** [15A NCAC 02D .0202]  
The Director of the DAQ may require the Permittee to register a source of air pollution. If the Permittee is required to register a source of air pollution, this registration and required information will be in accordance with 15A NCAC 02D .0202(b).
- II. **Ambient Air Quality Standards** [15A NCAC 02D .0501(c)]  
In addition to any control or manner of operation necessary to meet emission standards specified in this permit, any source of air pollution shall be operated with such control or in such manner that the source shall not cause the ambient air quality standards in 15A NCAC 02D .0400 to be exceeded at any point beyond the premises on which the source is located. When controls more stringent than named in the applicable emission standards in this permit are required to prevent violation of

the ambient air quality standards or are required to create an offset, the permit shall contain a condition requiring these controls.

JJ. **General Emissions Testing and Reporting Requirements** [15A NCAC 02Q .0508(i)(16)]

Emission compliance testing shall be by the procedures of Section .2600, except as may be otherwise required in Rules .0524, .1110, or .1111 of Subchapter 02D. If emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance for emission sources subject to Rules .0524, .1110, or .1111, the Permittee shall provide and submit all notifications, conduct all testing, and submit all test reports in accordance with the requirements of 15A NCAC 02D .0524, .1110, or .1111, as applicable. Otherwise, if emissions testing is required by this permit or the DAQ or if the Permittee submits emissions testing to the DAQ to demonstrate compliance, the Permittee shall perform such testing in accordance with 15A NCAC 02D .2600 and follow the procedures outlined below:

1. The owner or operator of the source shall arrange for air emission testing protocols to be provided to the Director prior to air pollution testing. Testing protocols are not required to be pre-approved by the Director prior to air pollution testing. The Director shall review air emission testing protocols for pre-approval prior to testing if requested by the owner or operator at least **45 days** before conducting the test.
2. Any person proposing to conduct an emissions test to demonstrate compliance with an applicable standard shall notify the Director at least **15 days** before beginning the test so that the Director may at his option observe the test.
3. The owner or operator of the source shall arrange for controlling and measuring the production rates during the period of air testing. The owner or operator of the source shall ensure that the equipment or process being tested is operated at the production rate that best fulfills the purpose of the test. The individual conducting the emission test shall describe the procedures used to obtain accurate process data and include in the test report the average production rates determined during each testing period.
4. Two copies of the final air emission test report shall be submitted to the Director not later than **30 days** after sample collection unless otherwise specified in the specific conditions. The owner or operator may request an extension to submit the final test report. The Director shall approve an extension request if he finds that the extension request is a result of actions beyond the control of the owner or operator.
  - a. The Director shall make the final determination regarding any testing procedure deviation and the validity of the compliance test. The Director may:
    - i. Allow deviations from a method specified under a rule in this Section if the owner or operator of the source being tested demonstrates to the satisfaction of the Director that the specified method is inappropriate for the source being tested.
    - ii. Prescribe alternate test procedures on an individual basis when he finds that the alternative method is necessary to secure more reliable test data.
    - iii. Prescribe or approve methods on an individual basis for sources or pollutants for which no test method is specified in 15A NCAC 02D .2600 if the methods can be demonstrated to determine compliance of permitted emission sources or pollutants.
  - b. The Director may authorize the DAQ to conduct independent tests of any source subject to a rule in 15A NCAC 02D to determine the compliance status of that source or to verify any test data submitted relating to that source. Any test conducted by the Division of Air Quality using the appropriate testing procedures described in 15A NCAC 02D .2600 has precedence over all other tests.

KK. **Reopening for Cause** [15A NCAC 02Q .0517]

1. A permit shall be reopened and revised under the following circumstances:
  - a. additional applicable requirements become applicable to a facility with remaining permit term of three or more years;
  - b. additional requirements (including excess emission requirements) become applicable to a source covered by Title IV;
  - c. the Director or EPA finds that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. the Director or EPA determines that the permit must be revised or revoked to ensure compliance with the applicable requirements.
2. Any permit reopening shall be completed or a revised permit issued within 18 months after the applicable requirement is promulgated. No reopening is required if the effective date of the requirement is after the expiration of the permit term unless the term of the permit was extended pursuant to 15A NCAC 02Q .0513(c).
3. Except for the state-enforceable only portion of the permit, the procedures set out in 15A NCAC 02Q .0507, .0521, or .0522 shall be followed to reissue the permit. If the State-enforceable only portion of the permit is reopened, the procedures in 15A NCAC 02Q .0300 shall be followed. The proceedings shall affect only those parts of the permit for which cause to reopen exists.

4. The Director shall notify the Permittee at least 60 days in advance of the date that the permit is to be reopened, except in cases of imminent threat to public health or safety the notification period may be less than 60 days.
5. Within 90 days, or 180 days if the EPA extends the response period, after receiving notification from the EPA that a permit needs to be terminated, modified, or revoked and reissued, the Director shall send to the EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate.

**LL. Reporting Requirements for Non-Operating Equipment [15A NCAC 02Q .0508(i)(16)]**

The Permittee shall maintain a record of operation for permitted equipment noting whenever the equipment is taken from and placed into operation. When permitted equipment is not in operation, the requirements for testing, monitoring, and recordkeeping are suspended until operation resumes.

**MM. Fugitive Dust Control Requirement [15A NCAC 02D .0540]**

As required by 15A NCAC 02D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall not cause or allow fugitive dust emissions to cause or contribute to substantive complaints or excess visible emissions beyond the property boundary. If substantive complaints or excessive fugitive dust emissions from the facility are observed beyond the property boundaries for six minutes in any one hour (using Reference Method 22 in 40 CFR, Appendix A), the owner or operator may be required to submit a fugitive dust plan as described in 02D .0540(f).

"Fugitive dust emissions" means particulate matter from process operations that does not pass through a process stack or vent and that is generated within plant property boundaries from activities such as: unloading and loading areas, process areas, stockpiles, stock pile working, plant parking lots, and plant roads (including access roads and haul roads).

**NN. Specific Permit Modifications [15A NCAC 02Q .0501 and .0523]**

1. For modifications made pursuant to 15A NCAC 02Q .0501(b)(2), the Permittee shall file a Title V Air Quality Permit Application for the air emission source(s) and associated air pollution control device(s) on or before 12 months after commencing operation.
2. For modifications made pursuant to 15A NCAC 02Q .0501(c)(2), the Permittee shall not begin operation of the air emission source(s) and associated air pollution control device(s) until a Title V Air Quality Permit Application is filed and a construction and operation permit following the procedures of Section .0500 (except for Rule .0504 of this Section) is obtained.
3. For modifications made pursuant to 502(b)(10), in accordance with 15A NCAC 02Q .0523(a)(1)(C), the Permittee shall notify the Director and EPA (Air Permitting Branch, EPA, Region 4, 61 Forsyth Street SW, Atlanta, GA 30303 or through the EPA CEDRI) in writing at least seven days before the change is made.
  - a. The written notification shall include:
    - i. a description of the change at the facility;
    - ii. the date on which the change will occur;
    - iii. any change in emissions; and
    - iv. any permit term or condition that is no longer applicable as a result of the change.
  - b. In addition to this notification requirement, with the next significant modification or Air Quality Permit renewal, the Permittee shall submit a page "E5" of the application forms signed by the responsible official verifying that the application for the 502(b)(10) change/modification, is true, accurate, and complete. Further note that modifications made pursuant to 502(b)(10) do not relieve the Permittee from satisfying preconstruction requirements.

**OO. Third Party Participation and EPA Review [15A NCAC 02Q .0521, .0522 and .0525(7)]**

For permits modifications subject to 45-day review by the federal EPA, EPA's decision to not object to the proposed permit is considered final and binding on the EPA and absent a third party petition, the failure to object is the end of EPA's decision-making process with respect to the revisions to the permit. The time period available to submit a public petition pursuant to 15A NCAC 02Q .0518 begins at the end of the 45-day EPA review period.