



SC DEPARTMENT *of* **ENVIRONMENTAL SERVICES**

Bureau of Air Quality State Construction Permit

**New-Indy Catawba LLC
5300 Cureton Ferry Road
Catawba, South Carolina 29704
York County**

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5), 48-1-100(A), and 48-1-110(a), the 1976 Code of Laws of South Carolina, as amended, and South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on April 07, 2021, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: CP-50000041 v1.0
Agency Air Number: 2440-0005

Issue Date: DRAFT

**Steve McCaslin, P. E., Director
Air Permitting Division
Bureau of Air Quality**



RECORD OF REVISIONS

Date	Description of Changes

DRAFT

A. PROJECT DESCRIPTION, EQUIPMENT, AND CONTROL DEVICE(S)

The kraft pulp production limit of 1,825 air dried tons of unbleached pulp per day (ADTUBP/day), established in construction permits 2440-0005-DA and -DC and present in the Title V Operating Permit is hereby superseded by a kraft pulp production limit of less than or equal to 2,700 ADTUBP/day.

Construction permits 2400-0005-DA and -DC limited the production of unbleached pulp to less than or equal to 1,825 ADTUBP/day, based on a 12-month rolling average when the facility produced pulp for bleaching. Under construction permit 2440-0005-DF, the facility converted operations from producing pulp for bleaching to producing pulp for unbleached products. This change affected the operation of the digester and allowed for an increase in production of pulp, for unbleached products, from the digester. The 1,825 ADTUBP/day production limit remains as an obsolete legacy condition in the facility's existing Title V permit. This construction permit confirms the change in production rate as included in the application for construction permit 2440-0005-DF (as well as evaluated in subsequent construction permits such as CP-50000061), listing that current rate at 2,700 ADTUBP/day.

A.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
5210	Continuous Digester System: Digester Chip Bin, Continuous Digester, Chip Feed System, Blow Tank, Steam Economizer and Reboiler, Pressure Refiners A and B	5270, 2605, 3705	2610S1, 2610S2
5220	Turpentine Recovery System: Gas Cooler, Condenser, Decanter	5105, 5260, 5260C, 5270, 2605, 3705	5105S, 2610S1, 2610S2
5230	Pulp Washing System: Pressure Diffuser, Filtrate Tank, 3-stage Brownstock Washer Lines w/Filtrate Tanks (2 lines in parallel, repurposed No. 1 Post O ₂ Washer, No. 2 Post O ₂ Washer, D ₀ Washer, D ₁ Washer, D ₂ Washer, E _{op} Washer) Brown Stock Liquor Suge Tank, Washed Stock Storage Tank (repurposed HD Tank)	5270, 2605, 3705	2610S1, 2610S2
5255	Pulp Refining and Washing: Deshive Refiners (2), Screw Presses (2), Screw Press Filtrate Tank, Filtrate Screen	5270, 2605, 3705	2610S1, 2610S2
2400	No. 1 Multi-Effect Evaporator Set with concentrator	5105, 5260, 5260C, 2605, 3705	5105S, 2610S1, 2610S2
2500	No. 2 Multi-Effect Evaporator Set with concentrator	5105, 5260, 5260C, 2605, 3705	5105S, 2610S1, 2610S2
5100	No. 3 Multi-Effect Evaporator Set with concentrator	5105, 5260, 5260C, 2605, 3705	5105S, 2610S1, 2610S2
5260	LVHC Collection System	5105, 5260C, 2605, 3705	5105S, 2610S1, 2610S2

A.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
5270	HVLC Collection System	2605, 3705	2610S1, 2610S2
9820	Stripper Off Gases (SOGs) Collection System	2605, 3705	2610S1, 2610S2
9800	40,000 gallon foul condensate Collection Tank (from NCG Systems)	2605, 3705	2610S1, 2610S2
9801	Backup Steam Stripper, 850 gallons/minute	9820, 2605, 3705	2610S1, 2610S2
9805	Low-Pressure (LP) Steam Stripper, 850 gallons/minute foul condensate, 6.5 gallons/minute methanol	5105, 2505, 5260C, 2605, 3705, 9820	5105S, 2505S, 2610S1, 2610S2
9806	Stripper Rectified Liquid (SRL) Condenser	2505, 5105, 2560C, 2605, 3705	2505S, 5105S, 2610S1, 2610S2
9804	80,400 gallon LP Steam Stripper Feed Tank	5105, 5260C, 2605, 3705	5105S, 2610S1, 2610S2
9807	1,300 gallon LP Steam Stripper Rectified Liquid (SRL) Methanol Tank	5105, 5260C, 2605, 3705	5105S, 2610S1, 2610S2
2901	Aerated Biotreatment (Aerated Stabilization Basin (ASB))	None	Fugitive
9802	Hard Pipe, 850 gallons/minute	2901	Fugitive
9803	Chemical Oxidation Treatment System	None	Fugitive

A.2 CONTROL DEVICES

Control Device ID	Control Device Description	Pollutant(s) Controlled	Emission Point ID
5260	LVHC Collection System	VOC, TRS, HAP	2610S1, 2610S2, Emergency Relief Valves: 24FL331, 24FL336, 24FL341, 51FL262, 26FL371
5260C	LVHC System Caustic Scrubber	VOC, TRS, HAP, SO ₂	2610S1, 2610S2

A.2 CONTROL DEVICES			
Control Device ID	Control Device Description	Pollutant(s) Controlled	Emission Point ID
5270	HVLC Collection System	VOC, TRS, HAP	2610S1, 2610S2, Emergency Relief Valves: 52HS937, 42FL967, 52FL967
9820	Stripper Off Gases (SOGs) Collection System	VOC, TRS, HAP	2610S1, 2610S2
2901	Aerated Biotreatment (Aerated Stabilization Basin (ASB))	VOC, TRS, HAP	Fugitive
2505	No. 2 NDCE Recovery Furnace, 412,140 ton BLS/year	VOC, TRS, HAP, SO ₂	2505S
5105	No. 3 NDCE Recovery Furnace, 744,600 ton BLS/year	VOC, TRS, HAP, SO ₂	5105S
2605	392–405 million BTU/hr No. 1 Combination Boiler, fired on natural gas, No. 6 fuel oil, bark, TDF, Specification used oil, waste paper, paper cores (275,000 lb/hr maximum steaming rate on mixed fuels): Boiler, TRS Gas Cooler, TRS Gas Condenser, TRS Mist Eliminator, TRS Gas Reheater <ul style="list-style-type: none"> • 392 million BTU/hr – No. 6 fuel oil or bark/woodwaste; • 405 million BTU/hr – natural gas 	VOC, TRS, HAP	2610S2
3705	420–720 million BTU/hr No. 2 Combination Boiler, fired on natural gas, No. 6 fuel oil, bark, TDF, Specification used oil, waste paper, paper cores (500,000 lb/hr maximum steaming rate on oil or gas only): Boiler, TRS Gas Cooler, TRS Gas Condenser, TRS Mist Eliminator, TRS Gas Reheater <ul style="list-style-type: none"> • 498 million BTU/hr – bark/wood waste; • 700 million BTU/hr - No. 6 fuel oil; • 720 million BTU/hr - natural gas 	VOC, TRS, HAP	2610S1

B. LIMITATIONS, MONITORING, AND REPORTING	
Condition Number	Conditions
B.1	Equipment ID: 5210, 5220, 5230, 5255, 2400, 2500, 5100, 9800, 9801, 2901, 9802, 9803, 9804, 9805, 9806, 9807 Control Device ID: 5260, 5260C, 5270, 9820, 2901, 2505, 5105, 2605, 3705

B. LIMITATIONS, MONITORING, AND REPORTING

Condition Number	Conditions
	(S.C. Regulation 61-62.1, Section II(J)(2)) The production limit of 1,825 air dried tons of unbleached pulp per day (ADTUBP/day) established in construction permits 2440-0005-DA (introduction) and DC condition 6.B.2 and present in the TV Operating Permit condition C.14, is hereby superseded by a maximum production limit of 2,700 ADTUBP/day; at which it has been demonstrated that the change is not a major modification under Prevention of Significant Deterioration as demonstrated in the permit records for construction permits 2440-0005-DF and CP-50000061.
B.2	<p>Equipment ID: 5210, 5220, 5230, 5255, 2400, 2500, 5100, 9800, 9801, 2901, 9802, 9803, 9804, 9805, 9806, 9807</p> <p>Control Device ID: 5260, 5260C, 5270, 9820, 2901, 2505, 5105, 2605, 3705</p> <p>(S.C. Regulation 61-62.1, Section II(J)(2)) The unbleached pulp production is limited to a maximum rate of 2,700 air dried tons of unbleached pulp per day (ADTUBP/day) (24-hour block). The owner or operator must record the actual unbleached pulp production daily. The Department shall be notified within 48 hours of any exceedance of the daily 24-hour block unbleached pulp production rate. A written report shall be submitted to the Department within 5 days of the exceedance along with calculations documenting the excess emissions. Excess emissions are those emitted when the production limit is exceeded by any amount for the 24-hour block day. Reports of the daily unbleached pulp production shall be submitted semiannually.</p>
B.3	<p>Facility Wide</p> <p>(S.C. Regulation 61-62.70.6(a)(6)(i)) The owner or operator shall continue to operate under all applicable requirements, including emission limits and standards, testing, monitoring, record keeping, and reporting under the existing Title V Operating Permit (2440-0005) and any unincorporated construction permits that are not changed or contravened by this construction permit, to include construction permits 2440-0005-DF and CP-50000061.</p>

C. NESHAP (40 CFR 61 AND 40 CFR 63) - RESERVED**D. GENERAL FACILITY WIDE**

Condition Number	Conditions
D.1	The owner or operator shall comply with S.C. Regulation 61-62.6, Control of Fugitive Particulate Matter, Section III Control of Fugitive Particulate Matter Statewide.
D.2	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
D.3	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II(L), the owner or operator may document an emergency situation through properly signed, contemporaneous

D. GENERAL FACILITY WIDE	
Condition Number	Conditions
	<p>operating logs, and other relevant evidence that verify:</p> <ol style="list-style-type: none"> 1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency; 2. The permitted source was at the time the emergency occurred being properly operated; 3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and 4. The owner or operator gave a verbal notification of the emergency to the Department within twenty-four (24) hours of the time when emission limitations were exceeded, followed by a written report within thirty (30) days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II(J)(1)(c)(i) through (J)(1)(c)(viii). The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. <p>This provision is in addition to any emergency or upset provision contained in any applicable requirement.</p>
D.4	<p>(S.C. Regulation 61-62.1, Section II(O)) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following:</p> <ol style="list-style-type: none"> 1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. 3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. 4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
D.5	<p>(S.C. Regulation 61-62.1, Section II(J)(1)(a)) No applicable law, regulation, or standard will be contravened.</p>
D.6	<p>(S.C. Regulation 61-62.1, Section II(J)(1)(e)) Any owner or operator who constructs or operates a source or modification not in accordance with the application submitted pursuant to this regulation or with the terms of any approval to construct, or who commences construction after the effective date of these regulations without applying for and receiving approval hereunder, shall be subject to enforcement action.</p>

E. EMISSIONS INVENTORY REPORTS - RESERVED**F. GENERAL RECORD KEEPING AND REPORTING**

Condition Number	Conditions
F.1	(S.C. Regulation 61-62.1, Section II(J)(1)(g)) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least five (5) years from the date the record was generated and shall be made available to a Department representative upon request.
F.2	The owner or operator shall submit reports required in this permit in a timely manner and according to the reporting schedule established through the Department's approved electronic permitting system.
F.3	All reports and notifications required under this permit shall be submitted to the Department.
F.4	(S.C. Regulation 61-62.1, Section II(A)(3)) The owner or operator shall submit written notification to the Department of the date construction is commenced, postmarked within thirty (30) days after such date.
F.5	<p>(S.C. Regulation 61-62.1, Section II(J)(1)(c)) For sources not required to have continuous emission monitors, any malfunction of air pollution control equipment or system, process upset, or other equipment failure which results in discharges of air contaminants lasting for one (1) hour or more and which are greater than those discharges described for normal operation in the permit application, shall be reported to the Department within twenty-four (24) hours after the beginning of the occurrence and a written report shall be submitted to the Department within thirty (30) days. The written report shall include, at a minimum, the following:</p> <ol style="list-style-type: none">1. The identity of the stack and/or emission point where the excess emissions occurred;2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions;3. The time and duration of excess emissions;4. The identity of the equipment causing the excess emissions;5. The nature and cause of such excess emissions;6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction;7. The steps taken to limit the excess emissions; and,8. Documentation that the air pollution control equipment, process equipment, or processes

F. GENERAL RECORD KEEPING AND REPORTING

Condition Number	Conditions
	<p>were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.</p> <p>The initial twenty-four (24) hour notification should be made to the Department's local Regional Office.</p> <p>The written report should be sent to the Department.</p>

G. PERMIT EXPIRATION AND EXTENSION

Condition Number	Conditions
G.1	<p>(S.C. Regulation 61-62.1, Section II(A)(4) and (5) and S.C. Regulation 61-62.1, Section II(J)(1)(f)) Approval to construct shall become invalid if construction:</p> <ul style="list-style-type: none"> a. Is not commenced within eighteen (18) months after receipt of such approval; b. Is discontinued for a period of eighteen (18) months or more; or c. Is not completed within a reasonable time as deemed by the Department. <p>The Department may extend the construction permit for an additional eighteen (18) month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.</p> <p>This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within eighteen (18) months of the projected and approved commencement date.</p>

H. PERMIT TO OPERATE

Condition Number	Conditions
H.1	(S.C. Regulation 61-62.1, Section II(F)(2)) When a Department issued construction permit includes only emission limits, monitoring, reporting, and/or other requirements that do not establish engineering or construction specifications for the project, the owner or operator may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
H.2	(S.C. Regulation 61-62.1, Section II(F)(4)(a)) For sources covered by an effective Title V Operating Permit, the modification request required by S.C. Regulation 61-62.70 shall serve as the request to

H. PERMIT TO OPERATE

Condition Number	Conditions
	operate for the purposes of S.C. Regulation 61-62.1, Section II(F). The request should be made using the appropriate Title V modification form.

I. AMBIENT AIR STANDARDS

Condition Number	Conditions
I.1	<p>Air dispersion modeling (or other method) has previously demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded.</p> <p>The owner or operator shall maintain this facility at or below the emission rates used in the most recent air dispersion modeling (or other method) demonstration submitted to and approved by the Department, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates used in the demonstration, not to exceed the pollutant limitations in the body of this permit, it may do so by submitting a new demonstration for approval. This condition along with the referenced modeling demonstration will also serve to meet the intent of S.C. Regulation 61-62.5, Standard No. 8, Section II(D). This is a State Only enforceable requirement.</p>