STATE OF TENNESSEE
AIR POLLUTION CONTROL BOARD
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243

Minor Modification #2 to

OPERATING PERMIT (TITLE V) Issued Pursuant to Tennessee Air Quality Act

This permit fulfills the requirements of Title V of the Federal Clean Air Act (42 U.S.C. 7661a-7661e) and the federal regulations promulgated thereunder at 40 CFR Part 70. (FR Vol. 57, No. 140, Tuesday, July 21, 1992 p.32295-32312). This permit is issued in accordance with the provisions of paragraph 1200-03-09-.02(11) of the Tennessee Air Pollution Control Regulations. The permittee has been granted permission to operate an air contaminant source in accordance with emissions limitations and monitoring requirements set forth herein.

Date Issued: May 22, 2020

Permit Number: **575065**

Date of Minor Modification: TBD, 2025

Date Expires: May 21, 2025

Issued To:

Hood Container Corporation

Installation Address:

2877 Scepter Road
New Johnsonville

Installation Description: Pulp and paper mill producing corrugated paper

43-0010-02:	Package boilers #2 & #3 192 MM BTU/hr each, backup for wood refuse boiler & LVHC
43-0010-07:	527 MM BTU/hr boiler
43-0010-08:	Cooking liquor preparation with wet scrubber
43-0010-10:	Paper machine and associated operations
43-0010-11:	Pulp mill operations and associated equipment
43-0010-12:	Wastewater treatment plant
43-0010-13:	Secondary Fiber Recycle Pulp Mill

Facility ID No.: 43-0010

Renewal Application Due Date: Between August 24, 2024 and November 22, 2024

Primary SIC: 26

Information Relied Upon:

Title V Application dated September 24, 2018.
Construction permit 961563P issued November 20, 2008
Construction permit 958331P issued April 21, 2006
Minor Modification Application dated December 20, 2023

_____
TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

POST AT INSTALLATION ADDRESS

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SECTION A

GENERAL PERMIT CONDITIONS

A permit issued under the provisions of paragraph 1200-03-09-.02(11) is a permit issued pursuant to the requirements of Title V of the Federal Act and its implementing Federal regulations promulgated at 40 CFR, Part 70.

A1. **Definitions.** Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

TAPCR 1200-03

A2. **Compliance requirement.** All terms and conditions in a permit issued pursuant to paragraph 1200-03-09-.02(11) including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act.

The permittee shall comply with all conditions of its permit. Except for requirements specifically designated herein as not being federally enforceable (State Only), non-compliance with the permit requirements is a violation of the Federal Act and the Tennessee Air Quality Act and is grounds for enforcement action; for a permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Non-compliance with permit conditions specifically designated herein as not being federally enforceable (State Only) is a violation of the Tennessee Air Quality Act and may be grounds for these actions.

TAPCR 1200-03-09-.02(11)(e)2(i) and 1200-03-09-.02(11)(e)1(vi)(I)

A3. **Need to halt or reduce activity.** The need to halt or reduce activity is not a defense for noncompliance. 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 the permit. However, nothing in this item shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations.

TAPCR 1200-03-09-.02(11)(e)1(vi)(II)

A4. **The permit.** The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

TAPCR 1200-03-09-.02(11)(e)1(vi)(III)

A5. **Property rights.** The permit does not convey any property rights of any sort, or any exclusive privilege.

TAPCR 1200-03-09-.02(11)(e)1(vi)(IV)

A6. **Submittal of requested information.** The permittee shall furnish to the Technical Secretary, within a reasonable time, any information that the Technical Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or termination of the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Technical Secretary copies of records required to be kept by the permit. If the permittee claims that such information is confidential, the Technical Secretary may review that claim and hold the information in protected status until such time that the Board can hear any contested proceedings regarding confidentiality disputes. If the information is desired by EPA, the permittee may mail the information directly to EPA. Any claims of confidentiality for federal purposes will be determined by EPA.

TAPCR 1200-03-09-.02(11)(e)1(vi)(V)

A7. **Severability clause.** The requirements of this permit are severable. A dispute regarding one or more requirements of this permit does not invalidate or otherwise excuse the permittee from their duty to comply with the remaining portion of the permit.

TAPCR 1200-03-09.02(11)(e)1(v)

A8. **Fee payment.**

(a) The permittee shall pay an annual Title V emission fee based upon the responsible official's choice of actual emissions, allowable emissions, or a combination of actual and allowable emissions; and on the responsible official's choice of annual accounting period. An emission cap of 4,000 tons per year per regulated pollutant per major source SIC Code shall apply to actual or allowable based emission fees. A Title V annual emission fee will not be charged for emissions in excess of the cap. Title V annual emission fees will not be charged for carbon monoxide or for greenhouse gas pollutants solely because they are greenhouse gases.

(b) Title V sources shall pay allowable based emission fees until the beginning of the next annual accounting period following receipt of their initial Title V operating permit. At that time, the permittee shall begin paying their Title V fee based upon their choice of actual or allowable based fees, or mixed actual and allowable based fees. Once permitted, the Responsible Official may revise their existing fee choice by submitting a written request to the Division no later than December 31 of the annual accounting period for which the fee is due.

(c) **W**hen paying annual Title V emission fees, the permittee shall comply with all provisions of 1200-03-26-.02 and 1200-03-09-.02(11) applicable to such fees.

(d) Where more than one (1) allowable emission limit is applicable to a regulated pollutant, the allowable emissions for the regulated pollutants shall not be double counted. Major sources subject to the provisions of paragraph 1200-03-26-.02(9) shall apportion their emissions as follows to ensure that their fees are not double counted.

1. Sources that are subject to federally promulgated hazardous air pollutant under 40 CFR 60, 61, or 63 will place such regulated emissions in the regulated hazardous air pollutant (HAP) category.

2. A category of miscellaneous HAPs shall be used for hazardous air pollutants listed at part 1200-03-26-.02(2)(i)12 that are not subject to federally promulgated hazardous air pollutant standards under 40 CFR 60, 61, or 63.

3. HAPs that are also in the family of volatile organic compounds, particulate matter, or PM_{10} shall not be placed in either the regulated HAP category or miscellaneous HAP category.

4. Sources that are subject to a provision of chapter 1200-03-16 New Source Performance Standards (NSPS) or chapter 0400-30-39 Standards of Performance for New Stationary Sources for pollutants that are neither particulate matter, PM_{10}, sulfur dioxide (SO_2), volatile organic compounds (VOC), nitrogen oxides (NO_x), or hazardous air pollutants (HAPs) will place such regulated emissions in an NSPS pollutant category.

5. The regulated HAP category, the miscellaneous HAP category, and the NSPS pollutant category are each subject to the 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

6. Major sources that wish to pay annual emission fees for PM_{10} on an allowable emission basis may do so if they have a specific PM_{10} allowable emission standard. If a major source has a total particulate emission standard, but wishes to pay annual emission fees on an actual PM_{10} emission basis, it may do so if the PM_{10} actual emission levels are proven to the satisfaction of the Technical Secretary. The method to demonstrate the actual PM_{10} emission levels must be made as part of the source's major source operating permit in advance in order to exercise this option. The PM_{10} emissions reported under these options shall not be subject to fees under the family of particulate emissions. The 4,000 ton cap provisions of subparagraph 1200-03-26-.02(2)(i) shall also apply to PM_{10} emissions.

TAPCR 1200-03-26-.02 and 1200-03-09-.02(11)(e)1(vii)

A9. **Permit revision not required.** A permit revision will not be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or process for changes that are provided for in the permit.

TAPCR 1200-03-09-.02(11)(e)1(viii)

A10. **Inspection and entry.** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Technical Secretary or an authorized representative to perform the following for the purposes of determining compliance with the permit applicable requirements:

(a) Enter upon, at reasonable times, the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) As authorized by the Clean Air Act and Chapter 1200-03-10 of TAPCR, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(e) "Reasonable times" shall be considered to be customary business hours unless reasonable cause exists to suspect noncompliance with the Act, Division 1200-03 or any permit issued pursuant thereto and the Technical Secretary specifically authorizes an inspector to inspect a facility at any other time.

TAPCR 1200-03-09-.02(11)(e)3.(ii)

A11. Permit shield.

(a) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that:

1. Such applicable requirements are included and are specifically identified in the permit; or

2. The Technical Secretary, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.

(b) Nothing in this permit shall alter or affect the following:

1. The provisions of section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section. Similarly, the provisions of T.C.A. §68-201-109 (emergency orders) including the authority of the Governor under the section;

2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

3. The applicable requirements of the acid rain program, consistent with section 408(a) of the Federal Act; or

4. The ability of EPA to obtain information from a source pursuant to section 114 of the Federal Act.

(c) Permit shield is granted to the permittee.

TAPCR 1200-03-09-.02(11)(e)6

A12. Permit renewal and expiration.

(a) An application for permit renewal must be submitted at least 180 days, but no more than 270 days prior to the expiration of this permit. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted.

(b) If the permittee submits a timely and complete application for permit renewal the source will not be considered to be operating without a permit until the Technical Secretary takes final action on the permit application, except as otherwise noted in paragraph 1200-03-09-.02(11).

(c) This permit, its shield provided in Condition A11, and its conditions will be extended and effective after its expiration date provided that the source has submitted a timely, complete renewal application to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)2 and 3, 1200-03-09-.02(11)(d)1(i)(III), and 1200-03-09-.02(11)(a)2

A13. Reopening for cause.

(a) A permit shall be reopened and revised prior to the expiration of the permit under any of the circumstances listed below:

1. Additional applicable requirements under the Federal Act become applicable to the sources contained in this permit provided the permit has a remaining term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the permit expiration date of this permit, unless the original has been extended pursuant to 1200-03-09-.02(11)(a)2.

2. Additional requirements become applicable to an affected source under the acid rain program.

3. The Technical Secretary or EPA determines 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.

4. The Technical Secretary or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue a permit shall follow the same proceedings as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists, and not the entire permit. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings for cause shall not be initiated before a notice of such intent is provided to the permittee by the Technical Secretary at least 30 days in advance of the date that the permit is to be reopened except that the Technical Secretary may provide a shorter time period in the case of an emergency. An emergency shall be established by the criteria of T.C.A. 68-201-109 or other compelling reasons that public welfare is being adversely affected by the operation of a source that is in compliance with its permit requirements.

(d) If the Administrator finds that cause exists to terminate, modify, or revoke and reissue a permit as identified in A13, he is required under federal rules to notify the Technical Secretary and the permittee of such findings in writing. Upon receipt of such notification, the Technical Secretary shall investigate the matter in order to determine if he agrees or disagrees with the Administrator's findings. If he agrees with the Administrator's findings, the Technical Secretary shall conduct the reopening in the following manner:

1. The Technical Secretary shall, within 90 days after receipt of such notification, forward to EPA a proposed determination of termination, modification, or revocation and reissuance, as appropriate. If the Administrator grants additional time to secure permit applications or additional information from the permittee, the Technical Secretary shall have the additional time period added to the standard 90 day time period.

2. EPA will evaluate the Technical Secretary's proposed revisions and respond as to their evaluation.

3. If EPA agrees with the proposed revisions, the Technical Secretary shall proceed with the reopening in the same manner prescribed under Condition A13 (b) and Condition A13 (c).

4. If the Technical Secretary disagrees with either the findings or the Administrator that a permit should be reopened or an objection of the Administrator to a proposed revision to a permit submitted pursuant to Condition A13(d), he shall bring the matter to the Board at its next regularly scheduled meeting for instructions as to how he should proceed. The permittee shall be required to file a written brief expressing their position relative to the Administrator's objection and have a responsible official present at the meeting to answer questions for the Board. If the Board agrees that EPA is wrong in their demand for a permit revision, they shall instruct the Technical Secretary to conform to EPA's demand, but to issue the permit under protest preserving all rights available for litigation against EPA.

TAPCR. 1200-03-09-.02(11)(f)6 and 7.

A14. **Permit transference.** An administrative permit amendment allows for a change of ownership or operational control of a source where the Technical Secretary determines that no other change in the permit is necessary, provided that the following requirements are met:

(a) Transfer of ownership permit application is filed consistent with the provisions of 1200-03-09-.03(6), and

(b) written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Technical Secretary.

TAPCR 1200-03-09-.02(11)(f)4(i)(IV) and 1200-03-09-.03(6)

A15. **Air pollution alert.** When the Technical Secretary has declared that an air pollution alert, an air pollution warning, or an air pollution emergency exists, the permittee must follow the requirements for that episode level as outlined in TAPCR 1200-03-09-.03(1) and TAPCR 1200-03-15-.03.

A16. **Construction permit required.** Except as exempted in TAPCR 1200-03-09-.04, or excluded in subparagraph TAPCR 1200-03-02-.01(1)(aa) or subparagraph TAPCR 1200-03-02-.01(1)(cc), this facility shall not begin the construction of a new air contaminant source or the modification of an air contaminant source which may result in the discharge of air contaminants without first having applied for and received from the Technical Secretary a construction permit for the construction or modification of such air contaminant source.

TAPCR 1200-03-09-.01(1)(a)

A17. **Notification of changes.** The permittee shall notify the Technical Secretary 30 days prior to commencement of any of the following changes to an air contaminant source which would not be a modification requiring a construction permit.

(a) change in air pollution control equipment

(b) change in stack height or diameter

(c) change in exit velocity of more than 25 percent or exit temperature of more than 15 percent based on absolute temperature.

TAPCR 1200-03-09-.02(7)

A18. **Schedule of compliance.** The permittee will comply with any applicable requirement that becomes effective during the permit term on a timely basis. If the permittee is not in compliance the permittee must submit a schedule for coming into compliance which must include a schedule of remedial measure(s), including an enforceable set of deadlines for specific actions.

TAPCR 1200-03-09-.02(11)(d)3 and 40 CFR Part 70.5(c)

A19. **Title VI.**

(a) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

(b) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

(c) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program(SNAP) promulgated pursuant to 40 CFR, Part 82, Subpart G, Significant New Alternatives Policy Program.

A20. **112 (r).** Sources which are subject to the provisions of Section 112(r) of the federal Clean Air Act or any federal regulations promulgated thereunder, shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. The annual certification is due in the office of the Technical Secretary no later than January 31 of each year. Said certification will be for the preceding calendar year.

TAPCR 1200-03-32-.03(3)

SECTION B

GENERAL CONDITIONS for MONITORING, REPORTING, and ENFORCEMENT

B1. **Recordkeeping.** Monitoring and related record keeping shall be performed in accordance with the requirements specified in the permit conditions for each individual permit unit. In no case shall reports of any required monitoring and record keeping be submitted less frequently than every six months.

(a) Where applicable, records of required monitoring information include the following:
- **1.** The date, place as defined in the permit, and time of sampling or measurements;
- **2.** The date(s) analyses were performed;
- **3.** The company or entity that performed the analysis;
- **4.** The analytical techniques or methods used;
- **5.** The results of such analyses; and
- **6.** The operating conditions as existing at the time of sampling or measurement.

(b) Digital data accumulation which utilizes valid data compression techniques shall be acceptable for compliance determination as long as such compression does not violate an applicable requirement and its use has been approved in advance by the Technical Secretary.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B2. **Retention of monitoring data.** The permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

TAPCR 1200-03-09-.02(11)(e)1(iii)(II)II

B3. **Reporting.** Reports of any required monitoring and record keeping shall be submitted to the Technical Secretary in accordance with the frequencies specified in the permit conditions for each individual permit unit. Reports shall be submitted within 60 days of the close of the reporting period unless otherwise noted. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official. Reports required under "State only requirements" are not required to be certified by a responsible official.

TAPCR 1200-03-09-.02(11)(e)1(iii)

B4. **Certification.** Except for reports required under “State Only” requirements, any application form, report or compliance certification submitted pursuant to the requirements of this permit shall contain certification by a responsible official of truth, accuracy and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

TAPCR 1200-03-09-.02(11)(d)4

B5. **Annual compliance certification.** The permittee shall submit annually compliance certifications with terms and conditions contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(a) The identification of each term or condition of the permit that is the basis of the certification;

(b) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(c) The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in B5(b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(d) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* “Excursion” shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667

B6. **Submission of compliance certification.** The compliance certification shall be submitted to:

The Tennessee Department of Environment and Conservation Environmental Field Office specified in Section E of this permit	and	Air Enforcement Branch US EPA Region IV 61 Forsyth Street, SW Atlanta, Georgia 30303

TAPCR 1200-03-09-.02(11)(e)3(v)(IV)

B7(MM1). Reserved

B8. **Excess emissions reporting.**

(a) The permittee shall promptly notify the Technical Secretary when any emission source, air pollution control equipment, or related facility breaks down in such a manner to cause the emission of air contaminants in excess of the applicable emission standards contained in Division 1200-03 or any permit issued thereto, or of sufficient duration to cause damage to property or public health. The permittee must provide the Technical Secretary with a statement giving all pertinent facts, including the estimated duration of the breakdown. Violations of the visible emission standard which occur for less than 20 minutes in one day (midnight to midnight) need not be reported. Prompt notification will be within 24 hours of the malfunction and shall be provided by telephone to the Division's Nashville office. The Technical Secretary shall be notified when the condition causing the failure or breakdown has been corrected. In attainment and unclassified areas if emissions other than from sources designated as significantly impacting on a nonattainment area in excess of the standards will not and do not occur over more than a 24-hour period (or will not recur over more than a 24-hour period) and no damage to property and or public health is anticipated, notification is not required.

(b) Any malfunction that creates an imminent hazard to health must be reported by telephone immediately to the Division's Nashville office at (615) 532-0554 and to the State Civil Defense.

(c) A log of all malfunctions, startups, and shutdowns resulting in emissions in excess of the standards in Division 1200-03 or any permit issued thereto must be kept at the plant. All information shall be entered in the log no later than twenty-four (24) hours after the startup or shutdown is complete, or the malfunction has ceased or has been corrected. Any later discovered corrections can be added in the log as footnotes with the reason given for the change. This log must record at least the following:

1. Stack or emission point involved
2. Time malfunction, startup, or shutdown began and/or when first noticed
3. Type of malfunction and/or reason for shutdown
4. Time startup or shutdown was complete or time the air contaminant source returned to normal operation
5. The company employee making entry on the log must sign, date, and indicate the time of each log entry

The information under items 1. and 2. must be entered into the log by the end of the shift during which the malfunction or startup began. For any source utilizing continuous emission(s) monitoring, continuous emission(s) monitoring collection satisfies the above log keeping requirement.

TAPCR 1200-03-20-.03 and .04

B9. **Malfunctions, startups and shutdowns - reasonable measures required.** The permittee must take all reasonable measures to keep emissions to a minimum during startups, shutdowns, and malfunctions. These measures may include installation and use of alternate control systems, changes in operating methods or procedures, cessation of operation until the process equipment and/or air pollution control equipment is repaired, maintaining sufficient spare parts, use of overtime labor, use of outside consultants and contractors, and other appropriate means. Failures that are caused by poor maintenance, careless operation or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions. This provision does not apply to standards found in 40 CFR, Parts 60(Standards of performance for new stationary sources), 61(National emission standards for hazardous air pollutants) and 63(National emission standards for hazardous air pollutants for source categories).

TAPCR 1200-03-20-.02

B10. Reserved.

B11. **Report required upon the issuance of a notice of violation for excess emissions.** The permittee must submit within twenty (20) days after receipt of the notice of violation, the data required below. If this data has previously been available to the Technical Secretary prior to the issuance of the notice of violation no further action is required of the violating source. However, if the source desires to submit additional information, then this must be submitted within the same twenty (20) day time period. The minimum data requirements are:

(a) The identity of the stack and/or other emission point where the excess emission(s) occurred;

(b) The magnitude of the excess emissions expressed in pounds per hour and the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

(c) The time and duration of the emissions;

(d) The nature and cause of such emissions;

(e) For malfunctions, the steps taken to correct the situation and the action taken or planned to prevent the recurrence of such malfunctions;

(f) The steps taken to limit the excess emissions during the occurrence reported, and

(g) If applicable, documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good operating practices for minimizing emissions.

Failure to submit the required report within the twenty (20) day period specified shall preclude the admissibility of the data for determination of potential enforcement action.

TAPCR 1200-03-20-.06(2), (3) and (4)

SECTION C
PERMIT CHANGES

C1. **Operational flexibility changes.** The source may make operational flexibility changes that are not addressed or prohibited by the permit without a permit revision subject to the following requirements:

(a) The change cannot be subject to a requirement of Title IV of the Federal Act or Chapter 1200-03-30.

(b) The change cannot be a modification under any provision of Title I of the federal Act or Division 1200-03.

(c) Each change shall meet all applicable requirements and shall not violate any existing permit term or condition.

(d) The source must provide contemporaneous written notice to the Technical Secretary and EPA of each such change, except for changes that are below the threshold of levels that are specified in Rule 1200-03-09-.04.

(e) Each change shall be described in the notice including the date, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change.

(f) The change shall not qualify for a permit shield under the provisions of part 1200-03-09-.02(11)(e)6.

(g) The permittee shall keep a record describing the changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. The records shall be retained until the changes are incorporated into subsequently issued permits.

TAPCR 1200-03-09-.02(11)(a)4 (ii)

C2. **Section 502(b)(10) changes.**

(a) The permittee can make certain changes without requiring a permit revision, if the changes are not modifications under Title I of the Federal Act or Division 1200-03 and the changes do not exceed the emissions allowable under the permit. The permittee must, however, provide the Administrator and Technical Secretary with written notification within a minimum of 7 days in advance of the proposed changes. The Technical Secretary may waive the 7 day advance notice in instances where the source demonstrates in writing that an emergency necessitates the change. Emergency shall be demonstrated by the criteria of TAPCR 1200-03-09-.02(11)(e)7 and in no way shall it include changes solely to take advantages of an unforeseen business opportunity. The Technical Secretary and EPA shall attach each such notice to their copy of the relevant permit.

(b) The written notification must be signed by a facility Title V responsible official and include the following:

1. a brief description of the change within the permitted facility;

2. the date on which the change will occur;

3. a declaration and quantification of any change in emissions;

4. a declaration of any permit term or condition that is no longer applicable as a result of the change; and

5. a declaration that the requested change is not a Title I modification and will not exceed allowable emissions under the permit.

(c) The permit shield provisions of TAPCR 1200-03-09-.02(11)(e)6 shall not apply to Section 502(b)(10) changes.

TAPCR 1200-03-09-.02(11)(a)4 (i)

C3. **Administrative amendment.**

(a) Administrative permit amendments to this permit shall be in accordance with 1200-03-09-.02(11)(f)4. The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

(b) The permit shield shall be extended as part of an administrative permit amendment revision consistent with the provisions of TAPCR 1200-03-09-.02(11)(e)6 for such revisions made pursuant to item (c) of this condition which meet the relevant requirements of TAPCR 1200-03-09-.02(11)(e), TAPCR 1200-03-09-.02(11)(f) and TAPCR 1200-03-09-.02(11)(g) for significant permit modifications.

(c) Proceedings to review and grant administrative permit amendments shall be limited to only those parts of the permit for which cause to amend exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)4

C4. **Minor permit modifications.**

(a) The permittee may submit an application for a minor permit modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(ii).

(b) The permittee may make the change proposed in its minor permit modification immediately after an application is filed with the Technical Secretary.

(c) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

(d) Minor permit modifications do not qualify for a permit shield.

TAPCR 1200-03-09-.02(11)(f)5(ii)

C5. **Significant permit modifications.**

(a) The permittee may submit an application for a significant modification in accordance with TAPCR 1200-03-09-.02(11)(f)5(iv).

(b) Proceedings to review and modify permits shall be limited to only those parts of the permit for which cause to modify exists, and not the entire permit.

TAPCR 1200-03-09-.02(11)(f)5(iv)

C6. **New construction or modifications.**

Future construction at this facility that is subject to the provisions of TAPCR 1200-03-09-.01 shall be governed by the following:

(a) The permittee shall designate in their construction permit application the route that they desire to follow for the purposes of incorporating the newly constructed or modified sources into their existing operating permit. The Technical Secretary shall use that information to prepare the operating permit application submittal deadlines in their construction permit.

(b) Sources desiring the permit shield shall choose the administrative amendment route of TAPCR 1200-03-09-.02(11)(f)4 or the significant modification route of TAPCR 1200-03-09-.02(11)(f)5(iv).

(c) Sources desiring expediency instead of the permit shield shall choose the minor permit modification procedure route of TAPCR 1200-03-09-.02(11)(f)5(ii) or group processing of minor modifications under the provisions of TAPCR 1200-03-09-.02(11)(f)5(iii) as applicable to the magnitude of their construction.

TAPCR 1200-03-09-.02(11)(d) 1(i)(V)

SECTION D

GENERAL APPLICABLE REQUIREMENTS

D1. **Visible emissions.** With the exception of air emission sources exempt from the requirements of TAPCR Chapter 1200-03-05 and air emission sources for which a different opacity standard is specifically provided elsewhere in this permit, the permittee shall not cause, suffer, allow or permit discharge of a visible emission from any air contaminant source with an opacity in excess of twenty (20) percent for an aggregate of more than five (5) minutes in any one (1)hour or more than twenty (20) minutes in any twenty-four (24) hour period; provided, however, that for fuel burning installations with fuel burning equipment of input capacity greater than 600 million btu per hour, the permittee shall not cause, suffer, allow, or permit discharge of a visible emission from any fuel burning installation with an opacity in excess of twenty (20) percent (6-minute average) except for one six minute period per one (1) hour of not more than forty (40) percent opacity. Sources constructed or modified after July 7, 1992 shall utilize 6-minute averaging.

Consistent with the requirements of TAPCR Chapter 1200-03-20, due allowance may be made for visible emissions in excess of that permitted under TAPCR 1200-03-05 which are necessary or unavoidable due to routine startup and shutdown conditions. The facility shall maintain a continuous, current log of all excess visible emissions showing the time at which such conditions began and ended and that such record shall be available to the Technical Secretary or an authorized representative upon request.

TAPCR 1200-03-05-.01(1), TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.02(1)

D2. **General provisions and applicability for non-process gaseous emissions.** Any person constructing or otherwise establishing a non-portable air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize the best equipment and technology currently available for controlling such gaseous emissions.

TAPCR 1200-03-06-.03(2)

D3. **Non-process emission standards.** The permittee shall not cause, suffer, allow, or permit particulate emissions from non-process sources in excess of the standards in TAPCR 1200-03-06.

D4. **General provisions and applicability for process gaseous emissions.** Any person constructing or otherwise establishing an air contaminant source emitting gaseous air contaminants after April 3, 1972, or relocating an air contaminant source more than 1.0 km from the previous position after November 6, 1988, shall install and utilize equipment and technology which is deemed reasonable and proper by the Technical Secretary.

TAPCR 1200-03-07-.07(2)

D5. **Particulate emissions from process emission sources.** The permittee shall not cause, suffer, allow, or permit particulate emissions from process sources in excess of the standards in TAPCR 1200-03-07.

D6. **Sulfur dioxide emission standards.** The permittee shall not cause, suffer, allow, or permit Sulfur dioxide emissions from process and non-process sources in excess of the standards in TAPCR 1200-03-14. Regardless of the specific emission standard, new process sources shall utilize the best available control technology as deemed appropriate by the Technical Secretary of the Tennessee Air Pollution Control Board.

D7. **Fugitive Dust.**

(a) The permittee shall not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in demolition of existing buildings or structures, construction operations, grading of roads, or the clearing of land;

2. Application of asphalt, water, or suitable chemicals on dirt roads, material stock piles, and other surfaces which can create airborne dusts;

3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials. Adequate containment methods shall be employed during sandblasting or other similar operations.

(b) The permittee shall not cause, suffer, allow, or permit fugitive dust to be emitted in such manner to exceed five (5) minutes per hour or twenty (20) minutes per day as to produce a visible emission beyond the property line of the property on which the emission originates, excluding malfunction of equipment as provided in Chapter 1200-03-20.

TAPCR 1200-03-08

D8. **Open burning.** The permittee shall comply with the TAPCR 1200-03-04 for all open burning activities at the facility.

TAPCR 1200-03-04

D9. **Asbestos.** Where applicable, the permittee shall comply with the requirements of TAPCR 1200-03-11-.02(2)(d) when conducting any renovation or demolition activities at the facility.

TAPCR 1200-03-11-.02(2)(d) and 40 CFR, Part 61

D10. **Annual certification of compliance.** The generally applicable requirements set forth in Section D of this permit are intended to apply to activities and sources that are not subject to source-specific applicable requirements contained in State of Tennessee and U.S. EPA regulations. By annual certification of compliance, the permittee shall be considered to meet the monitoring and related record keeping and reporting requirements of TAPCR 1200-03-09-.02(11)(e)1.(iii) and 1200-03-10-.04(2)(b)1 and compliance requirements of TAPCR 1200-03-09-.02(11)(e)3.(i). The permittee shall submit compliance certification for these conditions annually.

D11. **Emission Standards for Hazardous Air Pollutants.** When applicable, the permittee shall comply with the TAPCR 0400-30-38 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-38

D12. **Standards of Performance for New Stationary Sources.** When applicable, the permittee shall comply with the TAPCR 0400-30-39 for all emission sources subject to a requirement contained therein.

TAPCR 0400-30-39

D13. **Gasoline Dispensing Facilities.** When applicable, the permittee shall comply with the TAPCR 1200-03-18-.24 for all emission sources subject to a requirement contained therein.

D14. **Internal Combustion Engines.**

(a) All stationary reciprocating internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-38-.01.
(b) All stationary compression ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.01.
(c) All stationary spark ignition internal combustion engines, including engines deemed insignificant activities and insignificant emission units, shall comply with the applicable provisions of TAPCR 0400-30-39-.02.

TAPCR 0400-30-38 and 39

D15(MM1). The permittee shall maintain and repair each emission source, associated air pollution control device(s), and compliance assurance monitoring equipment as required to maintain and assure compliance with the specified emission limits.

TAPCR 1200-03-09-.03(8)

SECTION E

SOURCE SPECIFIC EMISSION STANDARDS, OPERATING LIMITATIONS, and MONITORING, RECORDKEEPING and REPORTING REQUIREMENTS

43-0010	**Facility Description:**	Neutral sulfite semi-chemical (NSSC) pulp and paper mill producing corrugated paper medium

Conditions E1 through E3-21 apply to all sources in Section E of this permit unless otherwise noted.

E1(MM2). Fee payment

FEE EMISSIONS SUMMARY TABLE FOR MAJOR SOURCE 43-0010

REGULATED POLLUTANTS	ALLOWABLE EMISSIONS (tons per AAP)	ACTUAL EMISSIONS (tons per AAP)	COMMENTS
PARTICULATE MATTER (PM)	**93.64**	**AEAR**	**Includes all fee emissions.**
SO_2	**576.45**	**AEAR**	**Includes all fee emissions.**
VOC	**400.06**	**AEAR**	**Includes all fee emissions.**
NO_X	**863.9**	**AEAR**	**Includes all fee emissions.**
Facility-Wide Total HAP Limit	**46.35**	**AEAR**	
Facility-Wide Individual HAP Limit		**AEAR**	
HAZARDOUS AIR POLLUTANTS (HAPs) NOT INCLUDED ABOVE*			
		AEAR	
		AEAR	
		AEAR	
MISCELLANEOUS POLLUTANTS NOT LISTED ABOVE**			
EACH MISC POLLUTANT NOT LISTED ABOVE			
Hydrogen sulfide	**12.7**	**AEAR**	
Sulfuric acid mist	**1.5**	**AEAR**	
		AEAR	
		AEAR	

NOTES

AAP The **Annual Accounting Period** (**AAP**) is a 12 consecutive month period that **either (a) begins each July 1st and ends June 30th of the following year when fees are paid on a fiscal year basis, or (b) begins January 1st and ends December 31st of the same year when paying on a calendar year basis.** The **AAP** at the time of modification #2 issuance **began July 1, 2024 and ends June 30, 2025.** The next AAP begins **July 1, 2025** and ends **June 30, 2026** unless a request to change the annual accounting period is submitted by the responsible official as required by subparagraph 1200-03-26-.02(9)(b) of the TAPCR and approved by the Technical Secretary**.** If the permittee wishes to revise their annual accounting period or their annual emission fee basis as allowed by subparagraph 1200-03-26-.02(9)(b) of the TAPCR, the responsible official must submit the request to the Division in writing on or before December 31 of the annual accounting period for which the fee is due. If a change in fee basis from allowable emissions to actual emissions for any pollutant is requested, the request from the responsible official must include the methods that will be used to determine actual emissions. **Changes in fee bases must be made using the Title V Fee Selection form, form number APC 36 (CN-1583), included as an attachment to this permit and available on the Division of Air Pollution Control's website**.

N/A **N/A** indicates that no emissions are specified for fee computation.

AEAR If the permittee is paying annual emission fees on an actual emissions basis, **AEAR** indicates that an **A**ctual **E**missions **A**nalysis is **R**equired to determine the actual emissions of:

(1) **each regulated pollutant** (Particulate matter [PM], SO_2, VOC, NO_X and so forth. See TAPCR 1200-03-26-.02(2)(i) for the definition of a regulated pollutant.),

(2) the "**HAP Not Included Above" Category (non-VOC and non-PM HAP not included in a facility-wide limit)**, and

(3) the **Miscellaneous Category**

under consideration during the **Annual Accounting Period**.

***** **Hazardous Air Pollutants Not Included Above:** This category is made-up of hazardous air pollutants that are not included in the VOC or PM category, such as HCl and HF, and are not included in a facility-wide HAP emission limitation. **For fee computation**, each individual hazardous air pollutant is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i) of the TAPCR.

****** **Miscellaneous Pollutants Not Listed Above:** This category is for pollutants that are not included in one of the other categories but for which an emission limitation has been established in this permit (including NSPS pollutants). **For fee computation**, each pollutant in this category is subject to the 4,000-ton cap provisions of subparagraph 1200-03-26-.02(2)(i).

END NOTES

The permittee shall:

(1) Pay Title V **annual fees** (including the emissions fee, base fee, significant modification fee, & minor modification fee), on the emissions and year bases requested by the responsible official and approved by the Technical Secretary, for each annual accounting period (AAP) by the payment deadline(s) established in TAPCR 1200-03-26-.02(9)(a). Fees may be paid on an **actual**, **allowable**, or **mixed** emissions basis, and on either a **state fiscal year** or a **calendar year**, provided the requirements of TAPCR 1200-03-26-.02(9)(b) are met. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8).

(2) Sources paying annual fees on an allowable emissions basis: pay annual fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d).
TAPCR 1200-03-26-.02(9)(a)2(i)

(3) Sources paying annual fees on a calendar year basis and an actual or mixed emissions basis: pay annual allowable based emission fees for each AAP no later than April 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(ii)

(4) Sources paying annual fees on a fiscal year basis and an actual or mixed emissions basis: for each AAP, pay an estimated 65% of the fee due no later than April 1 of the current fiscal year. The remainder of the fee for each annual accounting period is due no later than August 1 of each year pursuant to TAPCR 1200-03-26-.02(9)(d), except as allowed by TAPCR 1200-03-26-.02(9)(g)3.
TAPCR 1200-03-26-.02(9)(a)2(iii)

(5) Sources paying annual fees on a Fee Choice of an actual emissions basis: prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

(a) the completed **Fee Emissions Summary Table**,

(b) each **actual emissions analysis** required**,** and

(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the Fee Year basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analyses** required by the above **Fee Emissions Summary Table**.
TAPCR 1200-03-26-.02(9)(g)2

(6) Sources paying annual fees on a Fee Choice of a mixed emissions basis: for all

pollutants and all sources for which the permittee has chosen an actual emissions basis, prepare an **actual emissions analysis** for each AAP and pay **actual based emission fees** pursuant to TAPCR 1200-03-26-.02(9)(d). The **actual emissions analysis** shall include:

(a) the completed **Fee Emissions Summary Table**,

(b) each **actual emissions analysis** required**,** and

(c) the actual emission records for each pollutant and each source as required for actual emission fee determination, or a summary of the actual emission records required for fee determination, as specified by the Technical Secretary or the Technical Secretary's representative. The summary must include sufficient information for the Technical Secretary to determine the accuracy of the calculations. These calculations must be based on the Fee Year basis approved by the Technical Secretary (a state fiscal year [July 1 through June 30] or a calendar year [January 1 through December 31]). These records shall be used to complete the **actual emissions analysis**.

For all pollutants and all sources for which the permittee has chosen an allowable emissions basis, pay allowable based emission fees pursuant to TAPCR 1200-03-26-.02(9)(d).

TAPCR 1200-03-26-.02(9)(g)2

(7) When paying on an actual or mixed emissions basis, submit the **actual emissions analyses** at the time the fees are paid in full or earlier.

TAPCR 1200-03-26-.02(9)(g)2

(8) Include with each required AEAR report the following statement signed by the Responsible Official: *"I have reviewed this document in its entirety, and to the best of my knowledge, based on information and belief formed after reasonable inquiry, the statements and information contained in this document are true, accurate, and complete."*

TAPCR 1200-03-09-.02(11)(d)4

The annual fee due dates are specified in TAPCR 1200-03-26-.02(9)(a) and are dependent on the Responsible Official's choice of fee bases as described above. If any part of any fee imposed under TAPCR 1200-03-26-.02 is not paid within 15 days of the due date, penalties shall at once accrue as specified in TAPCR 1200-03-26-.02(8). Emissions for regulated pollutants shall not be double counted as specified in Condition A8(d) of this permit.

Payment of the fee due and the actual emissions analysis (if required) shall be submitted to the Technical Secretary at the following address:

Payment of Fee to:
Tennessee Department of Environment and Conservation
Division of Fiscal Services
Consolidated Fee Section – APC
Davy Crockett Tower, 6th Floor
500 James Robertson Parkway
Nashville, Tennessee 37243

and

Actual Emissions Analyses to:
A "Title V Emissions Summary Form" and the AEAR must be submitted electronically as directed by the Division. Additional information can be found at https://www.tn.gov/environment/air/inventory.html

TAPCR 1200-03-26-.02(3), (8), and (9), and TAPCR 1200-03-09-.02(11)(e)1(vii)

E2(AA1). **Reporting requirements**.

(a) **Semiannual reports.** Semiannual reports shall cover the six-month periods from **October 1st** to **March 31st** and **April 1st** to **September 30th** and shall be submitted within 60 days after the end of each six-month period. Subsequent reports shall be submitted within 60 days after the end of each 6-month period following the first report. The first semiannual report following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
560438	April 1, 2020	May 21, 2020
575065	May 22, 2020	September 30, 2020

These semiannual reports shall include:

(1) Any monitoring and recordkeeping required by Conditions and associated Logs as follows: Log 2 of **E3-5**, **E3-11, E3-12,** Log 3 of **E4-4**, Log 4 of **E5-1**, Log 5 of **E5-2,** Log 6 of **E5-12**, Log 7 of **E6-1**, **E7-3**, **E8-4**, **E10-1 and the report required by Condition E5-8** of this permit. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

(2) The visible emission evaluation readings from condition **E4-3, E5-4, E6-2, E7-2**, **E8-2,** and **E10-3** of this permit if required. However, a summary report of this data is acceptable provided there is sufficient information to enable the Technical Secretary to evaluate compliance.

(3) Identification of all instances of deviations from **ALL PERMIT REQUIREMENTS**.

These reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to The Technical Secretary at the address in Condition E2(b) of this permit.

TAPCR 1200-03-09-.02(11)(e)1.(iii)

(b) **Annual compliance certification.** The permittee shall submit annually compliance certifications with each term or condition contained in Sections A, B, D and E of this permit, including emission limitations, standards, or work practices. This compliance certification shall include all of the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

(1) The identification of each term or condition of the permit that is the basis of the certification;

(2) The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period; Such methods and other means shall include, at a minimum, the methods and means required by this permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Act, which prohibits knowingly making a false certification or omitting material information;

(3) The status of compliance with each term or condition of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in E2(b)2 above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion* or exceedance** as defined below occurred; and

(4) Such other facts as the Technical Secretary may require to determine the compliance status of the source.

* "Excursion" shall mean a departure from an indicator range established for monitoring under this paragraph, consistent with any averaging period specified for averaging the results of the monitoring.

** "Exceedance" shall mean a condition that is detected by monitoring that provides data in terms of an emission limitation or standard and that indicates that emissions (or opacity) are greater than the applicable emission limitation or standard (or less than the applicable standard in the case of a percent reduction requirement) consistent with any averaging period specified for averaging the results of the monitoring.

Annual compliance certifications shall cover the 12-month period from **October 1st** to **September 30th** and shall be submitted within 60 days after the end of each 12-month period. The first annual compliance certification following issuance of this permit shall cover the following permits and reporting periods:

Permit Number	Reporting Period Begins	Reporting Period Ends
560438	October 1, 2019	May 21, 2020
575065	May 22, 2020	September 30, 2020

These certifications shall be submitted to: **TN APCD** and **EPA**

Division of Air Pollution Control
Nashville Environmental Field Office
711 R.S. Gass Blvd
Nashville, TN 37216
or
Air.pollution.control@tn.gov

and **Air Enforcement Branch**
US EPA Region IV
61 Forsyth Street, SW
Atlanta, Georgia 30303

40 CFR Part 70.6(c)(5)(iii) as amended in the Federal Register Vol. 79, No.144, July 28, 2014, pages 43661 through 43667
TAPCR 1200-03-09-.02(11)(e)3.(v)

(c) **Retention of Records** All records required by any condition in Section E of this permit must be retained for a period of not less than five years. Additionally, these records shall be kept available for inspection by the Technical Secretary or a Division representative.

TAPCR 1200-03-09-.02(11)(e)1.(iii)(II)II

(d) MACT and NSPS semiannual and annual reporting periods shall be synchronized with the semiannual and annual reporting periods for this Title V permit. The semiannual reporting periods of April-September and October-March and the annual reporting period of October-September have been established and are stipulated in **Conditions E2(a) and E2(b)**. The MACT and NSPS reports shall be submitted within 60 days after each 6-month period ends. Unless otherwise noted, the MACT and NSPS reports shall be submitted within 60 days after each 6-month period ends.

All MACT and NSPS reports must be certified by a responsible official consistent with condition B4 of this permit and shall be submitted to: The Technical Secretary, Tennessee Division of Air Pollution Control, 312 Rosa L. Parks Avenue, 15TH Floor, Nashville, TN 37243 or electronic copy via email: Air.Pollution.Control@tn.gov

TAPCR 1200-03-10-.02(2)

E3. General Permit Requirements.

E3-1(AA1). Monthly logs of maintenance and/or repair for each designated air pollution control device shall be kept. This includes the venturi scrubber and tray absorption scrubber which both serve the wood refuse boiler, the cooking liquor scrubber, and the LVHC system. The logs shall denote what maintenance and what repair was done, when it was done, by whom, and when problems were rectified denoting date accomplished. Each log must be made available upon request by the Technical Secretary or a Division representative. Such logs must be maintained for 5 years. Records from these logs are not required to be submitted semiannually except for the LVHC system.

TAPCR 1200-03-09-.02(11)(e)1.(iii) and TAPCR 1200-03-10-.02(2)

Compliance Method: Included with the requirement.

E3-2(AA1). This facility is subject to 40 CFR 63 Subpart S, a NESHAP (MACT) requirement affecting the pulp and paper industry. General provisions are included in Attachment #4. The facility is considered a semi-chemical pulp and paper plant which processes wood and old corrugated containers (OCC)/recycled corrugated paper resulting in a corrugating paper medium as a final product. The applicable rule affects certain Kraft, soda, sulfite, or semi-chemical pulping processes using wood as stipulated in 63.440(a)(1). The facility has chosen to comply with the applicable (EPA Cluster Rule) standards contained in the rule by venting HAP emissions to a low volume high concentration (LVHC) gas system into the wood refuse boiler or into one of two package boilers for combustion. The LVHC system collects and routes gases from various operations/equipment including a blow tank and digester relief from the NSSC pulp mill and boil-out tank, evaporator hot well, and water reclaim tank from the black liquor tank. The gases are routed through a closed-vent system consisting of hard-case piping to either the wood refuse boiler or to one of the package boilers.

TAPCR 1200-03-09-.03(8)

The thermal oxidation of the non-condensable gases (NCG) in the wood refuse boiler or in one of two package/backup boilers (secondary backup system) constitutes a Pollution Prevention Project in the context of the EPA memorandum from Mr. John S. Seitz dated July 1, 1994.

The applicable rules that pertain to this facility under Subpart S with which the facility must comply, include, but are not limited to, the following:

Rule/federal citation	**Requirement/explanation**
1. 63.440(a)(1)	Applicability to semi-chemical pulping processes using wood
2. 63.443(b)(1)	Total HAP emissions from existing affected equipment/sources to be controlled for LVHC system
3. 63.443(c)	Equipment to be enclosed and routed through a closed-vent system
4. 63.443(d)(4)	Control device to reduce total HAP emissions using a boiler by introducing HAP emission stream with the primary fuel or into flame zone of the boiler
5. 63.443(e)(1)	Excess emissions for LVHC systems do not result if excess emission time divided by the total process operating time during a semi-annual period is less than or equal to 1%.
6 63.450(a)	Standards for enclosures and closed-vent systems
7. 63.450(b)	Negative pressure to be maintained on enclosures and hoods at all times except for sampling, inspection, maintenance, and repairs
8. 63.450(d)	Bypass venting for closed-vent systems
9. 63.450(d)(1)	Installation of a flow indicator to show the presence of a gas stream flow in the bypass line every 15 minutes
10. 63.453(k)(2)	Visible inspections of possible defects in closed-vent systems every 30 days
11. 63.453(k)(3)	Positive pressure closed-vent systems to be visibly checked initially and annually
12. 63.453(k)(6)	If defects are found or leaks noted per (k)(2) or (k)(3) or instrument readings indicate 500 PPM above background, then corrective action to be taken.
13. 63.453(k)(6)(i)	Closed-vent repairs/corrections to be attempted within 5 calendar days after problem is noted
14. 63.453(k)(6)(ii)	Repairs/corrective action to be completed within 15 days after problem is noted. Delay is allowed if technically not feasible without a process shutdown or other specified reasons.
15. 63.454(a)	General recordkeeping under 63.10 of Subpart A and records under 63.453
16. 63.454(b)	Site specific inspection plan with schematics of affected equipment and inspection records
17. 63.1	Reporting pursuant to Subpart A General Provisions; 63.6 - O & M related to startup, shutdown, and malfunction; 63.7 - performance testing requirements; 63.9 - notification of testing and source compliance; 63.10 - recordkeeping and reporting and associated reports

Construction permit 961563P issued November 20, 2008

Compliance Method: The permittee shall comply with applicable sections and requirements listed above for Subpart S as stipulated for each rule or section. The method of compliance utilized by the permittee is capturing and routing LVHC gases from designated equipment/operations per 63.443(c) into a control device (boiler) for thermal oxidation per 63.443(d)(4). The closed-vent system using sealed tank venting meet the applicable requirements of 63.450. A report of the compliance status and findings shall be submitted semiannually. Logs and records pertaining to Subpart S shall be kept on site and shall be made available upon request by the Technical Secretary or a Division representative and shall be retained for a period of not less than five years unless otherwise noted. This pertains to the wood refuse boiler (Source 07) and package boilers (Source 02) when routing and combusting NCG gases from the LVHC system.

The following log (Log 1) shall be kept to denote the times when the LVHC system is vented directly to the atmosphere uncontrolled due to malfunction and what boiler unit(s) shall be used to combust the NCG gas stream along with the reason for the malfunction. It shall also be used to calculate the total amount of time vented in the semi-annual period for comparison to the 1% of operational time allowed. Records of Log 1 shall be kept and shall be submitted semiannually in accordance with **Condition E2(a)(4)**.

TAPCR 1200-03-10-.02(2)

LOG 1

LOG OF LVHC SYSTEM MALFUNCTION PERIODS & SUBPART S ACTIONS

Month _____ Year _____

Date Boiler being Utilized to Combust NCG Gases	Time Period Non-Operational	Reason for Malfunction	Steps Taken to Minimize Emissions During Malfunction	Steps Taken to Prevent Recurrence of This Malfunction

E3-3(AA1). Logs and records specified in this permit shall be made available upon request by the Technical Secretary or representative and shall be retained for a period of not less than five years unless otherwise noted. These logs or records may be requested to be submitted semiannually. Each respective permit condition requiring logs or records will specify whether semiannual reporting is required.

TAPCR 1200-03-10-.02(2)

E3-4(AA1). Reasonable precautions must be taken to prevent the generation of fugitive dust. If valid complaints result, fugitive dust from this site shall not produce visible emissions beyond the property line for more than five minutes per hour or twenty minutes per day as determined by Tennessee Visible Emissions Evaluation Method 4.

TAPCR 1200-03-08-.01

Compliance Method: Compliance shall be assured by measures already in place.

E3-5. Open burning, as listed below, may be conducted subject to specified limitations. This grant of exception shall in no way relieve the person responsible for such burning from the consequences, damages, injuries, or claims resulting from such burning.

TAPCR 1200-03-04

(a) Material for open burning includes vegetation grown on the property of the burn site; manufactured lumber products not chemically treated to prevent insect or rot damage, such as plywood, fiberboard, and paneling, uncoated paper and uncoated cardboard; and paper items including roll cores and non-plastic packing material.

Compliance Method: A log (Log 2) listing the specific materials that are open burned and time periods of burning shall be kept during each day of open burning. Only those materials listed above may be burned at this location. Records of Log 2 shall be kept in accordance with **Condition E3-3** and shall be submitted semiannually in accordance **Condition E2(a)(1).**

TAPCR 1200-03-10-.02(2)

LOG 2

MONTHLY OPEN BURNING LOG

Month _____Year _____

Date	Time at Beginning of Open Burn(s) (x:xx AM/PM)	Time at Ending of Open Burn(s) (x:xx AM/PM)	Specific Material Combusted	Person making log entry

(b) The open burning of materials, handling and disposal of ash and other waste generated from this burning process must be conducted in accordance with all applicable Tennessee Division of Solid Waste Management regulations.

(c) Open burning may be conducted five days per week and may commence no earlier than 9:00 AM and no later than 2:00 PM. If, in an emergency situation, open burning must be conducted outside these hours, verbal notification must be made to Air Pollution Control staff in the Nashville Environmental Assistance Center on the next work day.

(d) The open burning site must be located at least one-half mile from any airport, hospital, nursing home, school, Interstate, US or State highway(s), national reservation, national or state park, wildlife area, national or state forest, and/or residence not on the same property as the open burning site, and shall be operated in such fashion as to assure no impairment of highway visibility. In addition, the site must be at least five hundred feet from any registered sanitary landfill or other land disposal sites for combustible solid waste or other similar facility. The person responsible for such burning must certify compliance with the distance requirements by written statement. The certification must include the types and amounts of materials projected to be burned, and must be delivered to the Division of Air Pollution Control at the appropriate regional Environmental Field Office at least ten working days prior to commencing the burn.

(e) No burning shall be conducted on days when the wind velocity is above twenty miles per hour, described as "Fresh" on the Beaufort Wind Scale. Refer to Attachment 2.

(f) All materials to be burned must be in a state to sustain good combustion. Burning must be conducted when ambient conditions are such that good dispersion of combustion products will result. No open burning will be conducted on a day when the Tennessee Division of Air Pollution Control has declared an Air Pollution Emergency Episode.

(g) Fugitive dust from the open burning site shall not produce visible emissions beyond the property line for more than five minutes per hour or twenty minutes per day as determined by Tennessee Visible Emissions Evaluation Method 4.

(h) If valid complaints are received by Division staff because of dust generated from roadways and parking areas, visible emissions from roads and parking lots associated with operation of this open burning site shall meet ten percent (10%) opacity as determined by Tennessee Visible Emissions Evaluation Method 1.

(i) Any exception to the open burning prohibition granted by this Rule Chapter does not relieve any person of the responsibility to obtain a permit required by any other agency, or of complying with other applicable requirements, ordinances, or restrictions.

(j) Materials strictly prohibited from being burned at this site shall include, but are not limited to:

1. Municipal waste and the waste resulting from the processing, storage, serving or consumption of food,
2. Tires,
3. Automobile batteries,
4. Asphalt shingles and roll roofing material,
5. Household furniture, appliances and store fixtures,
6. Wood that has been treated with or is contaminated with pentachlorophenol (PCP),
7. Waste paint and solvents,
8. Rubber, polystyrene, urea formaldehyde, styrofoam, electrical wire coatings and polyvinyl chloride,
9. Asbestos-containing materials, and
10. Other materials identified by the Technical Secretary because they generate noxious or toxic fumes or because the products of combustion adversely affect public health and welfare

E3-6. For the purposes of calculating sulfur dioxide emissions based on PPM measured, the following formula based on the 40 CFR (Code of Federal Regulations) Part 60.45 shall be used. This is based on pollutant concentration calculations where the one-hour concentration is multiplied by 2.59×10^{-9} M lbs/dscf per PPM, where M is the molecular weight, (64.07 for SO_2) at 68^0 F. TAPCR 1200-03-09-.03(8)

SO_2 in lbs/hr = 0.165315×10^{-6}/PPM x DSCF/min x 60 min/hr x Actual PPM SO_2 where DSCF is at 70^0 F

E3-7(AA1). This facility is subject to 40 CFR 63 Subpart DDDDD, a NESHAP (MACT) requirement affecting Industrial, Commercial, and Institutional Boilers and Process Heaters because the permittee is a major source of HAP emissions and has three boilers on site that produce steam for the mill operation. 40 CFR 63 Subpart DDDDD Industrial Boiler MACT applies to the operational boiler (43-0010-07) and the two package boilers (43-0010-02). General provisions are included in Attachment #4. TAPCR 1200-03-09-.03(8)

E3-8(AA1). Pursuant to 40 CFR §63.7550, the permittee must submit semiannual, annual, biennial, or 5-year, 40 CFR 63, Subpart DDDDD compliance reports, whichever is applicable. The compliance reports must contain the information required in (a) through (e) below:

(a) Company and Facility name and address.
(b) Process unit information, emissions limitations, and operating parameter limitations.
(c) Date of report and beginning and ending dates of the reporting period.
(d) The total operating time during the reporting period.
(e) Information as specified in section 40 CFR 63.7550 (c) for the reporting period

TAPCR 1200-03-09-.03(8)

E3-9. Pursuant to 40 CFR §63.7555 and §63.7560, the permittee must keep the following records pertaining to 40 CFR 63, Subpart DDDDD in a form suitable and readily available for expeditious review, according to §63.10(b)(1). The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). Records may be kept off site for the remaining 3 years. TAPCR 1200-03-09-.03(8)

(a) A copy of each notification and report submitted to comply with subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or compliance report submitted, according to the requirements in § 63.10(b)(2)(xiv).
(b) Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in § 63.10(b)(2)(viii).
(c) If the permittee operates a unit in the unit designed to burn gas 1 subcategory, and an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under part 63, other gas 1 fuel, or gaseous fuel subject to another subpart of part 63 or part 60, 61, or 65, is used, the permittee must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply emergencies.
(d) Records of the calendar date, time, occurrence and duration of each startup and shutdown.
(e) Records of the type(s) and amount(s) of fuels used during each startup and shutdown.

Compliance Method: Included with the requirement.

E3-10(AA1). The Notice of Compliance Status, dated November 8, 2016, addressed the applicable rules that pertain to this facility under Subpart DDDDD with which the permittee must comply. Additional requirements are included in Attachment 4.

Rule/federal citation	**Requirement/explanation**
63.7500	Work practice standards
63.7505	General requirements including
63.7510	Fuel analysis for each type of fuel burned
63.7515	Annual performance tests
63.7520	Stack tests and procedures
63.7525(h)	Operation of ESP
63.7530	Demonstration of initial compliance with emissions limits, fuel specifications, and work practice standards as appropriate
63.7535	Data will be collected and monitored as required
63.7540	Compliance demonstrations
63.7541	Emissions Averaging
63.7545	
63.7550	Submit annual, or 5-year, 40 CFR 63, Subpart DDDDD compliance reports. Tracking of amount and types of fuel burned in boilers as appropriate
63.7555 and 63.7560	Record keeping
Table 2	Items 1, 7, 14, and 15
Table 3	Items 3, 4, 5, and 6
Table 4	Item 4 for electrostatic precipitator beginning no later than January 31, 2016, and Items 7-10 if these methods are used to prove compliance with emissions limits by fuel analysis or

Rule/federal citation	Requirement/explanation
	performance testing.
Table 5	Items 3 and 4 if using performance test to demonstrate compliance with HCl and Mercury limits
Table 6	Items 1 and 2 if using fuel analysis to demonstrate compliance with Mercury and HCl limits
Table 9	Reporting requirements
Table 10	Applicability of General Provisions to Subpart DDDDD

Compliance Method: Included with the requirement.

E3-11(AA1). Fuel oil combusted at this facility shall not exceed 8.23 million gallons during any 12 consecutive months. This limitation was set as part of a PSD review. This is a facility-wide limitation.

TAPCR 1200-03-09-.01(4) and construction permit number 961563P issued November 20, 2008

Compliance Method: A log of onsite fuel oil usage, in gallons per month (backup boilers), gallons per month (wood refuse boiler), and gallons per 12 consecutive months (all boilers and fuel burning sources including insignificant sources), must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The logs required by this condition shall be used to certify compliance with this condition and in the requirements of **Condition E2**. This log must be retained for a period of not less than five years. Reports and certifications shall be submitted semiannually in accordance with **Condition E2(a)(1)** of this permit.

TAPCR 1200-03-10-.02(2)

E3-12. Fuel oil combusted onsite for purposes of generating process steam shall not have a sulfur content in excess of 0.05%. This limitation was set as part of a PSD review.

TAPCR 1200-03-09-.01(4) and construction permit number 961563P issued November 20, 2008

Compliance Method: Compliance with this limitation shall be assured through vendor's certification of sulfur content. The logs required by this condition shall be used to certify compliance with this condition and in the requirements of **Condition E2**. The permittee shall use vendor's certification for the sulfur content for each shipment of fuel oil or alternatively, the vendor may supply a statement effectively that all No. 2 fuel oil will contain no more than 0.05% sulfur by weight. The logs must be maintained on site and made readily available for a period of not less than five years. Reports and certifications shall be submitted semiannually in accordance with **Condition E2(a)(1)** of this permit.

E3-13. Regarding recordkeeping of logs, the following is applicable:

a. For sources required to maintain monthly logs:
All data, including all required calculations, must be entered in the log no later than 30 days from the end of the month for which the data is required.

b. For sources required to maintain weekly logs:
All data, including all required calculations, must be entered in the log no later than 7 days from the end of the week for which the data is required.

c. For sources required to maintain daily logs:
All data, including all required calculations, must be entered in the log no later than 7 days from the end of the day for which the data is required.

TAPCR 1200-03-10-.02

Compliance Method: Maintain record keeping schedule as required.

E3-14. This facility is not subject to 40 CFR 60 Subpart DDDD, a NSPS requirement affecting Commercial, Industrial, Solid Waste incineration because the permittee's mill does not conduct solid waste incineration. The Refuse Boiler (43-0010-07) burns wood, fuel oil, gas, black liquor, and pulping residuals including OCC. Black liquor is a by-product of the mill and is either sold as ligno-sulfate or burned in the Refuse Boiler for its heating value. The black liquor is never discarded and therefore never meets the definition of a solid waste. Pulping residuals falls under the exclusion found in 40 CFR 241.4(a)4 for pulp

and paper sludges that are not discarded and are burned on-site for their heating value. Records will be kept to document that the material is listed as a non-waste under 40 CFR 241.4.
40 CFR 60.2500 and TAPCR 1200-03-09-.03(8)

E3-15. In accordance with Section 112(r) of the Clean Air Act and 1200-03-32-.03(1) of Tennessee Air Pollution Control Regulations, this facility is required to file a copy of its accidental release plan with both EPA Region IV and the Tennessee Division of Air Pollution Control. The permittee shall annually certify in writing to the Technical Secretary that they are properly following their accidental release plan. Such certification is due no later than January 31 for the preceding calendar year in accordance with 1200-03-32-.03(3) of TAPCR.

E3-16(AA1). All air pollution control devices shall be operating when the equipment served by the devices are in operation. Upon the malfunction/failure of any emission control device(s) serving a particular source, the operation of the process(es) served by the device(s) shall be regulated by Chapter 1200-03-20 of the Tennessee Air Pollution Control Regulations. This also applies to any excess emissions due to start-up and shutdowns.

TAPCR 1200-03-20

Compliance Method: Follow the requirements as identified in TAPCR 1200-03-20, including reporting the malfunction / failure, tracking the malfunction / failure, and taking all reasonable measures to keep emissions to a minimum.

E3-17. Unless otherwise specified, visible emissions from any stack at this facility shall not exhibit greater than twenty percent (20%) opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and TAPCR 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using EPA Method 9 that is enclosed as **Attachment 1**.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E3-18. **CAM Plan.** This facility **is not** currently subject to regulations under 40 CFR Part 64 (Compliance Assurance Monitoring).

E3-19. This Title V Operating Permit No. 575065 represents the second renewal of the initial Title V Permit No. 548424 issued May 9, 2002, and all subsequent revisions since the initial Title V permit was issued. TAPCR 1200-03-09-.03(8)

Compliance Method: None.

E3-20(MM1). Identification of Responsible Official (RO), Technical Contact, and Billing Contact**.**

(a) The application that was utilized in the preparation of this permit is dated September 24, 2018, and was signed by Jimmy Gibson, Mill Manager indicates he would serve as the RO. Notification was received October 22, 2024 that John Curtis, Acting Mill Manager is now the Responsible Official. If this person terminates their employment or is assigned different duties such that he/she is no longer a Responsible Official for this facility as defined in part 1200-03-09-.02(11)(b)21 of the Tennessee Air Pollution Control Regulations, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Responsible Official and certification of truth and accuracy. All representations, agreement to terms and conditions, and covenants made by the former Responsible Official that were used in the establishment of the permit terms and conditions will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements, and/or covenants.

(b) The application that was utilized in the preparation of this permit is dated September 24, 2018, and was signed by Jimmy Gibson, Mill Manager indicates that Mike Goodman, Environmental Manager would serve as the Principal Technical Contact for the permitted facility A letter dated September 27, 2023 lists Jordan Moore, Environmental Manager as the Principal Technical Contact. If this person terminates their employment or is assigned different duties such that he/she is no longer the Principal Technical Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be

submitted within thirty days of the change. The notification shall include the name and title of the new Principal Technical Contact and certification of truth and accuracy.

(c) The application that was utilized in the preparation of this permit is dated September 24, 2018, and was signed by Jimmy Gibson, Mill Manager identifies Mike Goodman, Environmental Manager as the Billing Contact for the permitted facility. A letter dated September 27, 2023 lists Jordan Moore, Environmental Manager as the Billing Contact. If this person terminates their employment or is assigned different duties such that he/she is no longer the Billing Contact for this facility, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification must be in writing and must be submitted within thirty days of the change. The notification shall include the name and title of the new Billing Contact and certification of truth and accuracy.

TAPCR 1200-03-09-.03(8)

E3-21(AA1). Reserved

43-0010-02	**Two backup boilers to the wood refuse boiler for producing steam and secondary backup for combusting the NCG stream from a LVHC system, fired with natural gas/no. 2 fuel oil**	Package boilers #2 and #3 serve as backup boilers to the wood refuse boiler. They produce plant steam and also serve as secondary backup boilers for combusting NCG gases and are rated at 192 MM BTU/hr each. The NCG gas stream from various operations/emission points are routed in the LVHC system via hard case piping for incineration in the boiler unit used. This source is subject to MACT 40 CFR 63 Subpart S and Subpart DDDDD and is non-NSPS.

Conditions E4-1 through E4-12 apply to source 43-0010-02

E4-1. Sulfur dioxide emitted from Source 02 shall not exceed 0.51 pounds per million BTU heat input to the fuel burning installation (195.84 lb/hr, totaled from both boilers) and shall not exceed 29.21 tons totaled from both boilers during all intervals of twelve consecutive months. The 29.21 tons during all intervals of twelve consecutive months limitation was set as part of a PSD review. This total includes emissions from the combined combustion of primary fuel(s) and the NCG fuel.

TAPCR 1200-03-19-.14(1)(b)(5), 1200-03-09-.01(4), and construction permit 958331P issued April 21, 2006.

Compliance Method: Compliance shall be assured by compliance with **Conditions E4-4 and E4-10**. At 0.05% maximum sulfur content in fuel oil as required by **Condition E3-12**, representative of worst-case SO_2 emissions, the 0.51 lbs/MMBtu emission limit is not exceeded, the actual maximum emissions being 0.0507 lbs/MMBtu and 19.47 lb/hr, based on an AP-42 factor of 142S lb SO_2/1,000 gal, a fuel oil heating value of 140,000 Btu/gal and a maximum sulfur content in fuel oil of 0.05% (i.e., S =0.05). At this rate, the annual tonnage limit will not be exceeded provided the fuel oil combusted does not exceed 8.23 million gallons during all intervals of twelve consecutive months as stipulated in **Condition E4-10**.

If natural gas is used as fuel, the actual maximum emissions are 0.0006 lbs/MMBtu and 0.23 lb/hr, based on an AP-42 factor of 0.6 lb SO_2/MMSCF and a natural gas heating value of 1,020 MMBtu/MMSCF. At this rate, the annual tonnage limit cannot be exceeded.

E4-2. Particulate matter emitted from this fuel-burning installation shall not exceed 0.2329 pounds per million Btu heat input and 89.43 lb/hr, and shall not exceed 8.23 tons during all intervals of twelve consecutive months. The 8.23 tons during all intervals of twelve consecutive months limitation was set as part of a PSD review. This total includes emissions from the combined combustion of primary fuel(s) and the NCG fuel.

TAPCR 1200-03-06-.02(1), 1200-03-09-.01(4), and construction permit 958331F issued April 21, 2006.

Compliance Method: Compliance shall be assured by the use of No. 2 fuel oil or natural gas which meets the particulate emission limit per MMBtu of heat input. Using maximum emissions from fuel oil, the 0.2329 lbs/MMBtu and 89.43 lb/hr emission limitations are not exceeded, the actual maximum emissions being 0.0143 lbs/MMBtu and 5.49 lb/hr, based on an AP-42 factor of 2 lb PM/1,000 gal and a fuel oil heating value of 140,000 Btu/gal. Using the worst case fuel and maximum

emissions from No. 2 fuel oil, the annual tonnage limit will not be exceeded provided the fuel oil combusted does not exceed 8.23 million gallons during all intervals of twelve consecutive months as stipulated in **Condition E4-10**.

If natural gas is used as fuel, the actual maximum emissions are 0.0075 lbs/MMBtu and 2.86 lb/hr, based on an AP-42 factor of 7.6 lb PM/MMSCF and a natural gas heating value of 1,020 MMBtu/MMSCF. At this rate, the annual tonnage limit will not be exceeded provided the operating hours from Boiler #2 plus the operating hours from Boiler #3 do not exceed 6000 hours during all intervals of twelve consecutive months as stipulated in **Condition E4-4**.

E4-3. Visible emissions from the boilers shall not exhibit greater than twenty percent opacity, except for one six-minute period in any one hour period and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.03(6) and 1200-03-05-.01(1)

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E4-4. Operating hours from Boiler #2 plus operating hours from Boiler #3 shall not exceed 6000 hours during all intervals of twelve consecutive months. This operational limitation was set as part of a PSD review.

TAPCR 1200-03-09-.01(4) and construction permit number 958331P issued April 21, 2006.

Compliance Method: Compliance shall be assured by recording the monthly operating hours for each of the boilers. The following log (Log 3) shall be kept in accordance with **Condition E3-3** and shall be submitted semiannually in accordance with **Condition E2(a)(1)**. TAPCR 1200-03-10-.02(2)

LOG 3

LOG OF OPERATING HOURS FOR PACKAGE BOILERS
(SOURCE 02)

Month _____ Year _____

Date Month/year	Boiler #2 (hours)	Boiler #3 (hours)	Monthly operating hours totaled from both boilers (hours)	Total cumulative boiler operating hours for previous 12 months (hours)

E4-5. For fee purposes, the following values shall be utilized for allowable emissions based on maximum emissions for each billable gaseous pollutant not previously specified. This total includes emissions from the combined combustion of primary fuel(s) and the NCG fuel. The maximum VOC emissions are based on VOC emissions from natural gas as worst case with an emission factor of 5.5 lbs VOC/million scf of natural gas. The maximum NO_X emissions are based on NO_X emissions from natural gas as worst case and the results of a 7/13/2001 source test.

VOC	3.1 tons for 12 consecutive months
NO_X	171.4 tons for 12 consecutive months
Sulfuric Acid Mist	1.5 tons for 12 consecutive months

TAPCR 1200-03-26-.02(2)(d)3

E4-6(AA1). This facility shall comply with the applicable standards of 40 CFR 63 Subpart S, and the general NESHAP requirements found in Attachment #4..

NESHAPS MACT standard 40 CFR 63 Subpart S and construction permit 953392F issued January 12, 2001. TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance is assured by meeting the conditions and requirements of **Condition E3-2**.

Emission limits when combusting NCG gases in a package boiler

E4-7. Sulfur dioxide emitted from the incineration of the NCG gas stream in two back-up boilers shall not exceed 8.27 pounds per hour and shall not exceed 6.0 tons during all intervals of twelve consecutive months.

TAPCR 1200-03-14-.01(3); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 953392F issued January 12, 2001

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953392F, within 120 days of the startup of the non-condensable gas (NCG) incineration system. Test results indicated no appreciable NCG emissions and complied with the above limit. Subsequent tests of the NCG scrubber alone conducted in October of 2001 indicated compliance with NCG emission limits with or without the NCG scrubber in place. Combustion of NCG gases in the boiler will comply with the emission limits without the need of the NCG scrubber prior to combustion.

E4-8. Nitrogen oxides emitted from the incineration of the NCG gas stream in two back-up boilers shall not exceed 7.43 pounds per hour and shall not exceed 5.3 tons during all intervals of twelve consecutive months.

TAPCR 1200-03-06-.01(7); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 953392F issued January 12, 2001

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953392F, within 120 days of the startup of the non-condensable gas (NCG) incineration system. Test results indicated no appreciable NCG emissions and complied with the above limit. Subsequent tests of the NCG scrubber alone conducted in October of 2001 indicated compliance with NCG emission limits with or without the NCG scrubber in place. Combustion of NCG gases in the boiler will comply with the emission limits without the need of the NCG scrubber prior to combustion.

E4-9. Carbon monoxide emitted from the incineration of the NCG gas stream in two back-up boilers shall not exceed 2.33 pounds per hour and shall not exceed 1.7 tons during all intervals of twelve consecutive months.

TAPCR 1200-03-06-.01(7); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 953392F

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953392F, within 120 days of the startup of the non-condensable gas incineration (NCG) system. Test results indicated no appreciable NCG emissions and complied with the above limit. Subsequent tests of the NCG scrubber alone conducted in October of 2001 indicated compliance with NCG emission limits with or without the NCG scrubber in place. Combustion of NCG gases in the boiler will comply with the emission limits without the need of the NCG scrubber prior to combustion.

E4-10. Fuel oil combusted by this boiler is subject to the facility-wide limitation set forth in **Condition E3-11**.

TAPCR 1200-03-10-.02(2)
Compliance Method: As specified in **Condition E3-11**.

E4-11. These boilers shall comply with the applicable standards of 40 CFR 63 Subpart DDDDD. TAPCR 1200-03-09-.03(8)

Compliance Method: The permittee must meet the applicable work practice standards in Table 3 to subpart DDDDD for each affected unit designed to burn gas 1 type fuel in accordance with 40 CFR §63.7500:

If the unit is . . .	The permittee must. . .
A boiler or process heater with a continuous oxygen trim system that maintains an optimum air to fuel ratio.	Conduct a tune-up of the boiler or process heater every 5 years in accordance with § 63.7540
A boiler or process heater with heat input capacity of less than 10 million Btu per hour, but greater than 5 million Btu per hour.	Conduct a tune-up of the boiler or process heater biennially in accordance with § 63.7540
A boiler or process heater without a continuous oxygen trim system and with heat input capacity of 10 million Btu per hour or greater.	Conduct a tune-up of the boiler or process heater annually in accordance with § 63.7540
An existing boiler or process heater located at a major source facility, not including limited use units.	Have a one-time energy assessment performed by a qualified energy assessor according to § 63.7530(e). The energy assessment must include the items a. through h. in Table 3 as appropriate for the on-site technical hours listed in § 63.7575

(a) Pursuant to 40 CFR §63.7530(f) and 63.7545(a), the permittee must submit all of the notifications in §63.7(b) and (c), §63.8(e), (f)(4) and (6), and §63.9(b) through (h), including the Notification of Compliance Status containing the results of the initial compliance demonstration.

(b) Pursuant to 40 CFR §63.7550, the permittee must submit annual, biennial, and/or 5-year, 40 CFR 63, Subpart DDDDD compliance reports, whichever are applicable. In order to synchronize the reporting period with the Title V reporting period, the initial 40 CFR 63, Subpart DDDDD compliance report must cover the period beginning January 31, 2017 and ending on either December 31, 2017 if reporting annually, December 31, 2018 if reporting biennially, or December 31, 2022 if reporting every 5-years, whichever are applicable. Reports must be postmarked or delivered with the next required Semi Annual Report (SAR) in accordance with the reporting schedule established in condition **E(2)(a)**. Subsequent compliance reports after the initial report will cover shall be submitted with the next required Semi Annual Report (SAR) in accordance with the reporting schedule established in condition **E(2)(a)** after the end of each annual, biennial, or 5-year period following the first report.

(c) Pursuant to 40 CFR §63.7555 and §63.7560, the permittee must keep records pertaining to 40 CFR 63, Subpart DDDDD in a form suitable and readily available for expeditious review, according to §63.10(b)(1). The permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Each record must be kept on site, or they must be accessible from on site (for example, through a computer network), for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to § 63.10(b)(1). Records may be kept off site for the remaining 3 years.

E4-12. Fuel oil is to be combusted in Package Boiler #2 and/or Boiler #3 only during periods of natural gas curtailment. During Curtailment, these boilers are also subject to the conditions set forth in **Conditions E4-1-E4-4, E4-6, E4-10 and E4-11**.

Compliance Method: As specified in **Conditions E4-1 through E4-4, E4-6, E4-10** and **E4-11**

E4-13(MM2). Upon recent facility inspection, the two 192 MMBtu/hr natural gas-fired backup boilers (EU 43-0010-02) needed to be taken out of service while repairing the roof of the building housing the boilers. Therefore, Hood Container has rented a temporary natural gas-fired package unit boiler with a capacity of 72,000 pph. This boiler will be used solely as a backup to assist in restarting the primary 527 MMBtu/hr wood refuse boiler in the event of an unforeseen shutdown, as it would not result in any increase in emissions under the existing major source Title V Operating Permit Number 575065.

The facility submitted an Operational Flexibility Notification to TDEC APC on March 18, 2024, and the APC confirmed on April 4, 2024 that this change qualifies as an operational flexibility change under TAPCR 1200-03-09-.02(11)(a)4. Due to unforeseen delays, this project is now expected to be completed by the end of November 2024, extending beyond the 180-day limit as noted in 40 CFR 60 subpart Dc, with the possibility of further delays prolonging it more.

Within 30 days after the temporary boiler has ceased operation at the facility, the facility must report the starting and ending date of the use of the boiler to the Division. Failure to submit the report within the given time frame is a violation of Tennessee Code Annotated §68-201-105(b)(2).

43-0010-07	**527**	**MMBtu/hr**	**boiler**	This spreader stoker boiler is used to burn several fuels primarily wood and spent

	burning wood refuse, ammonium sulfite spent liquor, sludge, OCC rejects, facility waste oil, natural gas, and No. 2 fuel oil serving as primary boiler fuel for producing plant steam and combusting NCG gases from the LVHC system	liquor. Facility waste oil and other material as described herein may be burned. This operation uses two primary air pollution control devices consisting of a venturi scrubber and tray type absorption scrubber. This boiler unit serves as the primary combustor device for generating plant steam and thermally oxidizing the NCG gas stream to comply with Subpart S. These gases are routed through the LVHC system via hard case piping into the boiler for thermal oxidation. This source is subject to MACT 40 CFR 63 Subpart S, MACT 40 CFR 63 Subpart DDDDD, and to NSPS 40 CFR 60.40, and NSPS 40 CFR 60 Subpart D for Fossil-fuel-fired steam generating units when solely burning fossil fuel or a fossil fuel-wood mixture.

Conditions E5-1 through E5-19 apply to source 43-0010-07

E5-1(MM2). Filterable particulate matter emitted from this source shall comply with the limits specified in Table 2(7) of 40 CFR 63 Subpart DDDDD.

TAPCR 1200-03-09-.03(8)

Compliance Method:
The particulate control equipment at this source consists of a high efficiency venturi scrubber, a wet electrostatic precipitator (WESP), and a tray type absorption scrubber**.** Previous source sampling observed by the Division has verified particulate compliance using various fuels and combinations. On-going compliance with the above particulate limits shall be assured by maintaining a daily log of venturi scrubber parameters during days of boiler operation along with boiler fuel constituents and feed rates. For the venturi scrubber this pertains to the scrubber liquid flow rate (gallons per minute) and pressure drop (inches of water) across the venturi throat. For boiler operation this means type of fuel being burned (wood waste, fossil fuels, spent liquor or other permitted fuels) including any fuel additives and their quantities. One daily reading of each parameter is required for each day that the boiler operates and such readings shall be taken during actual boiler operation.

Based on Division review and discussions with the facility, a value of 1000 gallons per minute represents the acceptable minimum value of the venturi scrubber liquor flow rate and 10 inches of water represents the minimum acceptable pressure differential across the venturi scrubber.

Accordingly, official recording of such values has commenced for the scrubbers and the WESP. Readings shall only be taken on days when the wood refuse boiler is operational. Daily readings shall be reported semiannually in accordance with **Condition E2(a)(1)** and the following log (Log 4) shall be kept. Based on the established minimum acceptable values for the venturi scrubber liquid flow rate and the pressure differential across the venturi scrubber, if readings fall below these levels, relevant comments and any action taken shall be noted by the recorder on the daily log. Such values shall be reported as deviations in the semiannual report and reported in accordance with **Condition E2(a)(1).**

Compliance assurance of emission limits for the Refuse Boiler for bark only has been verified by source testing conducted on August 16-17, 2023, with results submitted to the Division in a report dated September 28, 2023, and accepted by the Division in a letter dated November 20, 2023. The flow rate shall be no less than 1,134.9 gpm (gallons per minute) and the scrubber differential shall measure no less than 10.5 PSI when the Refuse Boiler is burning bark only. Compliance assurance of emission limits for the Refuse Boiler for bark and liquor has been verified by source testing conducted on August 7, 2024, with results submitted to the Division in a report dated August 29, 2024, and accepted by the Division in a letter dated October 10, 2024.The venturi scrubber flow rate shall be no less than 1,017.0 gpm and the scrubber differential shall be no less than 9.9 PSI when the Refuse Boiler is burning bark and liquor. Any values outside these ranges over a 720-hour rolling average shall be recorded as deviations. Specific operating parameter limits (OPLs) values listed in this condition remain in effect unless subsequent required testing supports a different OPL value. If testing supports new OPLs the permittee shall submit an application to amend this permit. The permittee shall begin using the revised OPLs following the issuance of a permit amendment by the Technical Secretary.

LOG 4

PARAMETERS FOR WOOD REFUSE BOILER VENTURI SCRUBBER FOR SOURCE 07
All Values Represent a 720 hour rolling average

Month _____Year _____

Date	Hour	Venturi scrubber flow rate (gal/min)	Venturi scrubber differential pressure (inches of water)	Liquor being fed to the Boiler (gpm)	Compliant with Control Conditions (Y or N)	Comments

TAPCR 1200-03-10-.02(2)

E5-2. The burning of wood must supply at least thirty percent of the heat input to this boiler when ammonium sulfite spent liquor is burned for the boiler unit to qualify as a wood-fired boiler and the applicable standards.

TAPCR 1200-03-16-.02(3)(a)1, and TAPCR 1200-03-10-.02(2), and construction permit 961563P issued November 20, 2008

Compliance Method: Compliance shall be assured by maintaining the following log (Log 5) for days when ammonium sulfite is burned. Semiannual reporting for this log is not necessary.

LOG 5

LOG OF DATES WHEN AMMONIUM SULFITE SPENT LIQUOR IS FIRED WITH WOOD

Month _____Year _____

Date when ammonium sulfite spent liquor is burned	Wood refuse heat input to boiler greater than 30% of total heat input Yes/No	Person making log entry

E5-3. Nitrogen oxides emitted from this boiler shall not exceed 0.3 pounds per million BTU of heat input to this source and shall not exceed 692.5 tons during all intervals of twelve consecutive months. This total includes emissions from the combined combustion of primary fuel(s) and the NCG fuel.

TAPCR 1200-03-16-.02(5)(a), 40 CFR 60.44(a)(2), and construction permit 961563P issued November 20, 2008

Compliance Method: Compliance shall be assured by determining the worst case emissions from various fuels. Using the worst-case fuel and maximum NOx emissions from ammonium sulfite spent liquor, the annual tonnage limit will not be exceeded.

E5-4. Visible emissions from the wood refuse boiler shall not exceed twenty percent (20%) opacity except for one six minute period per hour of not more than 27 percent opacity as determined by EPA Method 9 published in 40 CFR 60, Appendix A (6-minute average).

TAPCR 1200-03-16-.02(6)(g)1, 40 CFR 60.45(g)(1), and construction permit 961563P issued November 20, 2008

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E5-5. The sulfur dioxide emissions from this source shall not exceed 0.20 pounds of SO2 per million Btu of heat input and 105.4 pounds per hour. This total includes emissions from the combined combustion of primary fuel(s) and the NCG fuel. This emission limitation shall apply at all times when wood refuse, fossil fuels, ammonium sulfite spent liquor, primary sludge, corrugated container rejects, and waste oil are burned. This standard supersedes and is more restrictive than the previous sulfur dioxide emission standards of ninety percent controlled when burning ammonium sulfite spent liquor and less than 0.80 pounds of SO2 per million Btu of heat input when operating pursuant to 40 CFR Subpart D.

This emission limitation was set as part of a previous PSD review (for permit 958331P), in order to limit allowable sulfur dioxide emissions from increased utilization of this boiler.

TAPCR 1200-03-09-.01(4) and Construction permit 961563P issued November 20, 2008

Compliance Method: Compliance with these emission standards shall be determined through the use of continuous in-stack monitoring for sulfur dioxide. NSPS applicability and the requirement for continuous monitoring for the wood refuse boiler at Inland was established based on the November 1, 1977 EPA memo from Edward Reich to Tommie Gibbs. Compliance shall be determined utilizing a three-hour averaging basis (block average).

TAPCR 1200-03-09-.02(11)(e)1.(iii) and construction permit 961563P issued November 20, 2008

E5-6. Operational Availability Condition for the Sulfur Dioxide Monitoring System

The use of continuous in-stack monitoring for sulfur dioxide is the method by which this fuel burning installation proves continual compliance with the applicable sulfur dioxide emission limitation. Therefore, for this fuel burning installation to demonstrate continual compliance with the applicable sulfur dioxide emission limitation, the sulfur dioxide monitoring system shall be fully operational for at least ninety five percent of the operational time of the monitored unit during each month of the calendar quarter. An operational availability level of less than this amount may be considered the basis for declaring the fuel burning installation in noncompliance with the applicable monitoring requirements, unless the reasons for the failure to maintain these levels of operational availability are accepted by the Division as being legitimate malfunctions of the instruments or due to limited operation of the monitored units.

TAPCR 1200-03-10-.02(1)(a) and construction permit 961563P issued November 20, 2008

E5-7. Quality Assurance Condition for the Sulfur Dioxide Monitoring System

Quality assurance checks shall be performed on the sulfur dioxide monitoring system on an annual basis. The quality assurance checks shall consist of a repetition of the relative accuracy portion of the Performance Specification Test. Written reports of the quality assurance checks shall be submitted to the Technical Secretary.

Within ninety days of each major modification or major repair of any sulfur dioxide emissions monitor, diluent monitor, or electronic signal combining system, a repeat of the performance specification test shall be conducted. A written report of the performance specification test shall be submitted to the Technical Secretary as proof of the continuous operation of the sulfur dioxide emissions monitoring system within acceptable limits.

TAPCR 1200-03-10-.02(1)(a) and construction permit 961563P issued November 20, 2008

E5-8. From the emissions data generated by the continuous sulfur dioxide monitoring systems, reports of excess sulfur dioxide emissions shall be generated. The format of these reports shall meet the requirements of Paragraph 1200-03-10-.02(2) of the Tennessee Air Pollution Control Regulations. These reports shall be submitted as part of the semiannual reports required by Condition E2(a).

TAPCR 1200-03-10-.02(2), 1200-03-09-.02(11)(e)1(iii) and construction permit 961563P issued November 20, 2008

E5-9. For sulfur dioxide monitoring, the reports referenced in **Condition E5-8** shall consist of:

(a) Emission averages, in the units of the applicable standard, for each averaging period during operation of the source.
(b) Identification of each averaging period in which the applicable standard was exceeded and the nature and cause of excess emissions, if known;

(c) The date and time identifying each period during which the system was inoperative, except for zero and span checks, and the nature of system repairs or adjustments shall be reported. The Technical Secretary may require proof of system performance whenever system repairs or adjustments have been made; and

(d) When no excess emissions have occurred and the system has not been inoperative, repaired, or adjusted, such information shall be included in the report.

TAPCR 1200-03-10-.02(2), 1200-03-09-.02(11)(e)1(iii) and construction permit 961563P issued November 20, 2008

E5-10. This boiler shall comply with the applicable standards of 40 CFR 63 Subpart S.

NESHAPS MACT standard Subpart S and construction permit 953393F issued January 12, 2001. TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance is assured by meeting the conditions and requirements of **Condition E3-2**.

E5-11(AA2). For fee purposes the following is pertinent for emission source 07:
HAP and VOC emissions are billable pollutants pursuant to 1200-03-26-.02(2)(i)(12) of TAPCR. In accordance with 1200-03-26-.02(2)(d)3, for pollutants with no specific allowable emission rate, the allowable emissions are based on maximum actual emissions expected at full design capacity operating at 24 hours per day, every day, or expected at the operating time specified in a legally enforceable permit. Pollutants are not to be double-counted for fees so that HAP-VOC emissions are not to be counted twice as VOC emissions but are a subset of the VOC emissions previously listed. The remaining HAP emissions are to be categorized as non-VOC gaseous HAPs and particulate matter HAPs. For emission source 07, the following values shall be used utilized for billing purposes based on maximum actual emissions as described above:

VOC emissions: 30.8 tons per year based on AP-42 emission factor of 0.12 lbs VOC per ton of wood, VOC HAPs of 20.3 tons per year (included in the VOC emissions) based on the revised VOC and HAP emission submittal of September 4, 2001, 0.8 tons per year of non-VOC gaseous HAPs (same submittal), and 5.5 tons per year of particulate matter HAPs (same submittal).

Particulate emissions of 85.41 tons per year based on 0.037 lbs/MM BTU
Sulfur dioxide emissions of 461.7 tons per year based on 0.20 lbs/MM BTU

TAPCR 1200-03-26-.02(2)(d)3., 1200-03-26-.02(2)(i)(12) and 40 CFR 63 Subpart DDDDD Table 2(7)

E5-12. The amount of on and off spec oil, as defined at 40 CFR 279, and nonhazardous solvents that can be burned in this fuel burning installation shall not exceed 1000 gallons per month. In addition, oil contaminated media, and oil-contaminated soil and absorbent material used to clean up oil spills may be burned.

TAPCR 1200-03-09-.02(11)(e)1.(iii) and TAPCR 1200-03-10-.02(2) and construction permit 961563P issued November 20, 2008

Compliance Method: Compliance for this condition is assured by the utilizing the following log (Log 6) to record the type and amount of material burned listed above. The data from this log shall be kept as stipulated in **Condition E3-3** and shall be submitted semiannually in accordance with **Condition E2(a)(1)**.

LOG 6

MONTHLY WASTE OIL BURNED AND NON-CONVENTIONAL MATERIAL BURNED IN WOOD REFUSE BOILER

Month _____Year _____

Date	Specific Material Combusted	Amount of waste oil and solvents burned (gallons)	Amount of material other than waste oil and solvents combusted (pounds/gallons)	Person making log entry

Emission limits when combusting NCG gases in the wood refuse boiler

E5-13. Sulfur dioxide emitted from the thermal oxidation of the NCG gas stream in the wood refuse boiler shall not exceed 0.83 pounds per hour.

TAPCR 1200-03-14-.01(3); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 961563P issued November 20, 2008

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953393F, within 120 days of the startup of the non-condensable gas thermal oxidation system. Test results indicated no appreciable sulfur dioxide emissions from NCG combustion.

E5-14. Nitrogen oxides emitted from the thermal oxidation of the NCG gas stream in the wood refuse boiler shall not exceed 7.3 pounds per hour.

TAPCR 1200-03-14-.01(3); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 961563P issued November 20, 2008

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953393F, within 120 days of the startup of the non-condensable gas thermal oxidation system. Test results indicated no appreciable NOX emissions from NCG combustion.

E5-15. Carbon monoxide emitted from the thermal oxidation of the NCG gas stream in the wood refuse boiler shall not exceed 2.33 pounds per hour.

TAPCR 1200-03-14-.01(3); agreement letter dated December 20, 2000; PSD avoidance; and construction permit 961563P issued November 20, 2008

Compliance Method: Source tests conducted during July and August of 2001 and observed by the Division were done in accordance with construction permit 953393F, within 120 days of the startup of the non-condensable gas thermal oxidation system. Test results indicated no appreciable CO emissions from NCG combustion.

E5-16(AA2). Hydrogen Chloride emitted from this source shall comply with the limits stated in 40 CFR 63.7500 Table 2, 63.7505(c), 63.7545, and 63.7525(l), according to your boiler or process heater subcategory and what type of fuel is being combusted.

TAPCR 1200-03-09-.03(8)

Compliance Method: Compliance with this limitation will be shown by using the SO2 CEMS as a surrogate to demonstrate compliance as allowed in the standard and acceptance of the 0.249 lbs/MMBtu as the allowable limit to determine compliance based on a 30 day rolling average. Specific operating parameter limits (OPLs) values listed in this condition remain in effect unless subsequent required testing supports a different OPL value. If testing supports new OPLs the permittee shall submit an application to amend this permit. The permittee shall begin using the revised OPLs following the issuance of a permit amendment by the Technical Secretary.

E5-17(AA1). After January 31, 2016, Mercury emitted from this source shall comply with the limits stated in 40 CFR 63.7500 table 2, 63.7505(c), 63.7545, and 63.7525(l), according to your boiler or process heater subcategory and what type of fuel is being combusted.

TAPCR 1200-03-09-.03(8)

Compliance Method: The Permittee shall comply with this by monthly fuel sampling. These records shall be kept in accordance with **Condition E3-1** and submitted semiannually with the Boiler MACT report.

E5-18. Fuel oil combusted by this boiler is subject to the facility-wide limitation set forth in **Condition E3-11**.

TAPCR 1200-03-09-.03(8)

Compliance Method: As specified in **Condition E3-11**.

E5-19. This boiler shall comply with the applicable standards of 40 CFR 63 Subpart DDDDD.

TAPCR 1200-03-09-.03(8)

43-0010-08	**Cooking liquor preparation system with wet scrubber**	The cooking liquor preparation system processes sulfur, which is burned and then, is combined with water and ammonia in an absorption system to produce cooking liquor. The absorption system serves primarily as a process device as well as a sulfur dioxide scrubber.

Conditions E6-1 and E6-2 apply to source 43-0010-08

E6-1. Sulfur Dioxide emissions shall not exceed 100 ppm (dry basis). An allowable of 1.48 pounds per hour based on the application of record results from a maximum flow tare of 1,480 dscf/min. This corresponds to 6.48 tons of sulfur dioxide during all intervals of twelve consecutive months. This value shall be assigned as the allowable sulfur dioxide tonnage for fee purposes.

TAPCR 1200-03-19-.14(1)(c)(7)(i) for cooking liquor systems and 1200-03-26-.02(2)(d)(3)

Compliance Method: Compliance shall be assured by Lundberg data and in-house test values of sulfur dioxide from the scrubber outlet. A source test conducted on July 12, 2001 that was observed by the Division indicated an average outlet stack concentration of 19 PPM for sulfur dioxide. Daily readings during cooking liquor operation shall be taken of the scrubber liquid flow rate in gallons per minute. One daily reading of this parameter is required for each day that the cooking liquor preparation system operates and such readings shall be taken during actual process operation.

A parameter gauge was installed, calibrated, and operational to measure scrubber cooking liquor flow rate. Readings were taken for more than 30 days after the gauge was properly operating and were taken on days in which both the process and control device were operational. The data was submitted by the permittee to the Division in a letter dated October 20, 2003. Based on Division review and discussions with the facility, a value of 10 gallons per minute represents the acceptable minimum value of scrubber liquor flow rate.

Readings shall only be taken on days when the process is operational. Daily readings shall be reported semiannually in accordance with **Condition E2(a)(1)** and the following log (Log 7) shall be kept. Based on the established minimum acceptable value for cooking liquor scrubber liquid flow rate, if readings fall below this level, relevant comments and any action taken shall be noted by the recorder on the daily log. Such values shall be reported as deviations in the semiannual report and reported in accordance with **Condition E2(a)(1).**

TAPCR 1200-03-10-.02(2)

LOG 7

COOKING LIQUOR SCRUBBER LIQUID FLOW RATE

Month _____Year _____

Date	Scrubber liquid flow rate (gal/min)	Greater than 10 gallons per minute ?	If less than 10 gallons per minute, why and what actions are being taken?

A monthly log of maintenance and repair of the scrubber shall be kept on site in accordance with **Condition E3-1.** The log shall denote what maintenance and what repair was done, when it was done, by whom, and when problems were rectified showing date accomplished. The following maintenance log (Log 8) shall be kept. Semiannual reports are not necessary for this maintenance log.

LOG 8

MONTHLY MAINTENANCE LOG OF COOKING LIQUOR SCRUBBER

Month _____Year _____

Date	Scrubber ID	Repair/Maintenance Performed	Person making log entry

E6-2. Visible emissions from the cooking liquor scrubber shall not exhibit an opacity in excess of twenty percent for an aggregate of more than five minutes in any one hour or more than twenty minutes in any twenty-four hour period as specified in Rule 1200-03-05-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

TAPCR 1200-03-05-.01

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using TVEE Method 2 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

43-0010-10	**Paper machine and associated operations**	Wood pulp from the NSSC and recycle pulp are blended at an annualized average of 75,000 pounds per hour of machine dry pulp. The material is sent through screening, headbox, Fourdrinier, presses, dryers, and then wound on reels resulting in a final product of paper. VOCs, ammonia, and HAPs are released to the atmosphere.

Conditions E7-1 through E7-4 apply to source 43-0010-10

E7-1(AA2). This emission source predates reasonable and proper gaseous emission control (April 3, 1972) under TAPCR 1200-03-07-.07(2); therefore, there are no regulatory or ammonia allowable emission limits for this source. HAP emissions are billable pollutants pursuant to 1200-03-26-.02(2)(i)(12) of TAPCR. In accordance with 1200-03-26-.02(2)(d)3, for pollutants with no specific allowable emission rate, the allowable emissions are based on maximum actual emissions expected at full design capacity operating at 24 hours per day, every day, or expected at the operating time specified in a legally enforceable permit. Pollutants are not to be double-counted for fees so that HAP-VOC emissions are not to be counted twice as VOC emissions but are a subset of the VOC emissions previously listed. The remaining HAP emissions are to be categorized as non-VOC gaseous HAPs and particulate matter HAPs. For this emission source, the following values shall be utilized for fee billing purposes based on maximum actual emissions as described above:

Based on the September 4, 2001 VOC and HAP submittal, the following values are relevant for this source: 0.14 tons per year of non-VOC gaseous HAP emissions. There are no particulate matter HAPs.

TAPCR 1200-03-26-.02(2)(d)3. and 1200-03-26-.02(2)(i)(12)

E7-2. Visible emissions from the stack emission points in the paper machine process shall not exhibit an opacity in excess of twenty percent for an aggregate of more than five minutes in any one hour or more than twenty minutes in any twenty-four hour period as specified in Rule 1200-03-05-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

TAPCR 1200-03-05-.01

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using TVEE Method 2 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E7-3(AA1). Paper machine production shall not exceed 407,340 bone-dry tons during any period of 12 consecutive months.

This operating limitation was set as part of a PSD review in order to limit emissions from the paper machine and from increased utilization of other non-modified sources. The relevant increase in paper machine production is from the 2003/2004 average of 277,710 bone-dry tons per year to the new maximum level of 407,340 bone-dry tons per year.

TAPCR 1200-03-09-.01(4) and TAPCR 1200-03-10-.02(2) and construction permit 958331P issued April 21, 2006

Compliance Method A log of the production rate for this source, in bone-dry tons per month and bone-dry tons per 12 consecutive months, must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The log required by this condition shall be used to certify compliance with this condition and in the requirements of **Condition E2.** This log must be retained for a period of not less than five years. Reports and certifications shall be submitted semiannually in accordance with **Condition E2(a)(1)** of this permit.

E7-4(AA1). VOC emissions shall not exceed 41.95 lb/hr. Pulp must be washed with hot water in a counter current fashion prior to sending it to the paper machine. These emission and operation limitations are established as BACT for this source.

TAPCR 1200-03-09-.01(4)(j) and construction permit 958331P issued April 21, 2006

Compliance Method Compliance is based on a source test conducted on a non-kraft semichemical paper machine as described in NCASI Technical Bulletin 683, which resulted in an emission factor of 0.812 pounds per air-dried ton of product. At 0.9 tons of bone-dried ton of product per air-dried ton of product, this corresponds to 41.95 lb/hr for a production of 407,340 bone-dry tons during any period of 12 consecutive months. The Permittee shall maintain documentation to substantiate that the pulp washing has occurred. This information shall be kept readily accessible and made available upon request by the Technical Secretary or a Division representative.

43-0010-11	**Pulp mill including NSSC blow tank and other associated equipment and operations, and OCC**	Wood pulp from the wood chip steaming vessel is processed with anhydrous ammonia and cooking liquor in an impregnator, continuous digester, primary refiner, blow tank, washer and repulpers, filtrate tanks, and to secondary refiners. The maximum throughput is 101,010 pounds per hour resulting in NSSC pulp and weak spent liquor. VOCs, HAPs, ammonia, and sulfur dioxide are released to the atmosphere.

Conditions E8-1 through E8-4 apply to source 43-0010-11

E8-1. This emission source predates reasonable and proper gaseous emission control (April 3, 1972) under TAPCR 1200-03-07-.07(2); therefore, there are no regulatory VOC or ammonia allowable emission limits for this source. HAP and VOC emissions are billable pollutants pursuant to 1200-03-26-.02(2)(i)(12) of TAPCR. In accordance with 1200-03-26-.02(2)(d)3, for pollutants with no specific allowable emission rate, the allowable emissions are based on maximum actual emissions expected at full design capacity operating at 24 hours per day, every day, or expected at the operating time specified in a legally enforceable permit. Pollutants are not to be double-counted for fees so that HAP-VOC emissions are not to be counted twice as VOC emissions but are a subset of the VOC emissions previously already listed. The remaining HAP emissions are to be categorized as non-VOC gaseous HAPs and particulate matter HAPs. For this emission source, the following values shall be utilized for billing purposes based on maximum actual emissions as described above:

Based on the September 4, 2001 VOC and HAP submittal, the following values are relevant for this source: VOC emissions of 78.9 tons per year, 72.6 tons per year of VOC HAP emissions included in the VOCs, 0.03 tons per year of non-VOC gaseous HAP emissions. There are no particulate matter HAPs.

TAPCR 1200-03-26-.02(2)(d)3. and 1200-03-26-.02(2)(i)(12)

E8-2. Visible emissions from stack emission points on the NSSC pulp mill shall not exhibit an opacity in excess of twenty percent for an aggregate of more than five minutes in any one hour or more than twenty minutes in any twenty-four hour period as specified in Rule 1200-03-05-.01 of the Tennessee Air Pollution Control Regulations (aggregate count). Visible emissions from stacks will be determined by Tennessee Visible Emission Evaluation Method 2 as adopted by the Tennessee Air Pollution Control Board on August 24, 1984.

TAPCR 1200-03-05-.01

Compliance Method: The permittee shall assure compliance with the opacity standard by utilizing the opacity matrix dated June 18, 1996, and amended September 11, 2013, using TVEE Method 2 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

E8-3. Sulfur dioxide emissions shall not exceed 50 PPM (dry basis) for all vents other than the continuous digester and blow tank serving this process. These two operations route NCG emissions to the LVHC system for incineration and have no separate stack exit and thus no allowable. For the other vents within this process, the following stack emission points are subject to 50 PPM of sulfur dioxide (dry basis). Corresponding flow rates and equivalent allowable for each stack are shown in the table below.

Stack Description	Stack/vent ID	Flow rate (dscf/min)	Allowable SO_2 concentration (PPM)	Allowable SO_2 emission rate at flow rate shown (lbs/hr)
Pulp mill washers & repulpers	2130SA	15,700	50	7.83
Pulp mill washers & repulpers	2130SB	15,700	50	7.83
No. 1 Filtrate tank	2140S	3,740	50	1.87
No. 2 Filtrate tank	2145S	1,040	50	0.52
Total				18.05

A total of 18.05 pounds per hour of allowable emissions results from combining all process stacks for this source based on the application of record at the maximum flow rate for each stack shown above. This corresponds to a total of 79.06 tons of sulfur dioxide during all intervals of twelve consecutive months and this value shall be assigned as the total allowable sulfur dioxide tonnage for fee purposes.

A reduction in allowable emissions from 100 to 50 PPM was set as part of a PSD review for this permit.

TAPCR 1200-03-09-.01(4) and 1200-03-19-.14-(1)(c)7.(iv) and construction permit 958331P issued April 21, 2006

Compliance Method: Compliance is assured by November 7, 2001 SO_2 testing by the permittee using a calibrated SO_2/H_2S meter. Actual test results for the 2 washer vents indicated 0.3 PPM and filtrate tank vents at 1.5 PPM and 12.4 PPM for Filtrate tanks No. 1 and No. 2, respectively.

E8-4(AA1). Pulp mill production shall not exceed 176,700 bone-dry tons during any period of 12 consecutive months. This operating limitation was set as part of a PSD review for this permit.

TAPCR 1200-03-09-.01(4) and construction permit 958331P issued April 21, 2006

Compliance Method A log of production rate for this source, in bone-dry tons per month and bone-dry tons per 12 consecutive months, must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The log required by this condition shall be used to certify compliance with this condition and in the requirements of **Condition E2**. This log must be retained for a period of not less than five years. Reports and certifications shall be submitted semiannually in accordance with Condition **E2(a)(1)** of this permit.

43-0010-12	**Wastewater treatment plant**	Process sewer water and ash slurry are processed for wastewater treatment.

Condition E9-1 applies to source 43-0010-12

E9-1. This emission source predates reasonable and proper gaseous emission control (April 3, 1972) under TAPCR 1200-03-07-.07(2); therefore, there are no regulatory VOC allowable emission limits for this source. HAP and VOC emissions are billable pollutants pursuant to 1200-03-26-.02(2)(i)(12) of TAPCR. In accordance with 1200-03-26-.02(2)(d)3, for pollutants with no specific allowable emission rate, the allowable emissions are based on maximum actual emissions expected at full design capacity operating at 24 hours per day, every day, or expected at the operating time specified in a legally enforceable permit. Pollutants are not to be double-counted for fees so that HAP-VOC emissions are not to be counted twice as VOC emissions but are a subset of the VOC emissions previously already listed. The remaining HAP emissions are to be categorized as non-VOC gaseous HAPs and particulate matter HAPs. For this emission source, the following values shall be used utilized for billing purposes based on maximum actual emissions as described above:

Based on the September 4, 2001 VOC and HAP submittal, the following values are relevant for this source: VOC emissions of 101.4 tons per year, 101.4 tons per year of VOC HAP (methanol) emissions included in the VOCs, 0.0 tons per year of non-VOC gaseous HAP emissions. There are no particulate matter HAPs.

TAPCR 1200-03-26-.02(2)(d)3. and 1200-03-26-.02(2)(i)(12)

43-0010-13	**Secondary Fiber Recycle Pulp Mill (BACT: VOC)**	This Secondary Fiber Recycle Pulp Mill recycles old corrugated container (OCC) and double kraft liner (DKL) into pulp for use in the paper machine. The existing secondary fiber recycle pulp mill includes an OCC pulper, and a Thickening Process, all of which are considered emission units as this term is defined in TAPCR 1200-03-09-.04(5)(a)1. This source has no pollution control, and is not subject to 40 CFR Part 63 Subpart S. This Secondary Fiber Recycle Pulp Mill includes an OCC pulper and associated screening equipment, as well as a waste thickener.

Conditions E10-1 through E10-3 apply to source 43-0010-13

E10-1(AA1). Secondary Fiber Recycle Pulp Mill production shall not exceed 230,640 bone-dry tons during any period of 12 consecutive months.

This operating limitation was set as part of a PSD review.

TAPCR 1200-03-09-.01(4) and TAPCR 1200-03-10-.02(2) and construction permit 958331P issued April 21, 2006 and amended May 9, 2007

Compliance Method A log of the production rate for this source, in bone-dry tons per month and bone-dry tons per 12 consecutive months, must be maintained at the source location and kept available for inspection by the Technical Secretary or a Division representative. The log required by this condition shall be used to certify compliance with this condition and in the requirements of **Condition E2**. This log must be retained for a period of not less than five years. Reports and certifications shall be submitted semiannually in accordance with Condition **E2(a)(1)** of this permit.

E10-2. Volatile organic compounds (VOC) emitted from the OCC plant shall not exceed 0.49 pounds per hour. In order to achieve compliance with this emission limitation, no VOC-containing additives or solvents will be used in the pulping process in the Secondary Fiber Recycle Pulp Mill. These emission and operation limitations are established as BACT for this source.

TAPCR 1200-03-09-.01(4)(j) and construction permit 958331P issued April 21, 2006 and amended May 9, 2007

Compliance Method: Compliance is based on an emissions factor of 0.0185 pounds per bone-dry ton of pulp from a source test performed on a similar unit on July 19,1994.

E10-3. Visible emissions from this source shall not exhibit greater than twenty percent opacity, except for one six-minute period in any one hour period, and for no more than four six-minute periods in any twenty-four hour period. Visible emissions from this source shall be determined by EPA Method 9, as published in the current 40 CFR 60, Appendix A (six-minute average).

TAPCR 1200-03-05-.01(1) and 1200-03-05-.03(6)

Compliance Method: Compliance with this opacity limitation shall be certified through utilization of the Division's Opacity Matrix dated June 18, 1996, and amended September 11, 2013, using EPA Method 9 that is enclosed as Attachment 1.

If the magnitude and frequency of excursions reported by the permittee in the periodic monitoring for emissions is unsatisfactory to the Technical Secretary, this permit may be reopened to impose additional opacity monitoring requirements.

END OF MM2 to PERMIT NUMBER: 575065

ATTACHMENT 1

OPACITY MATRIX DECISION TREE for VISIBLE EMISSION EVALUATION for TVEE Method 2 and EPA Method 9, dated JUNE 18, 1996 and Amended September 11, 2013

OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 2
dated September 11, 2013

Decision Tree PM for Opacity for Sources Subject to Rule 1200-03-05-.01 Utilizing TVEE Method 2

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standard in Rule 1200-03-05-.01. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PMT required.

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing Tennessee Visible Emission Evaluation Method 2. The observer must be properly certified according to the criteria specified in EPA Method 9 to conduct TVEE Method 2 evaluations.

Typical Pollutants
Particulates, VOC, CO, SO_2, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

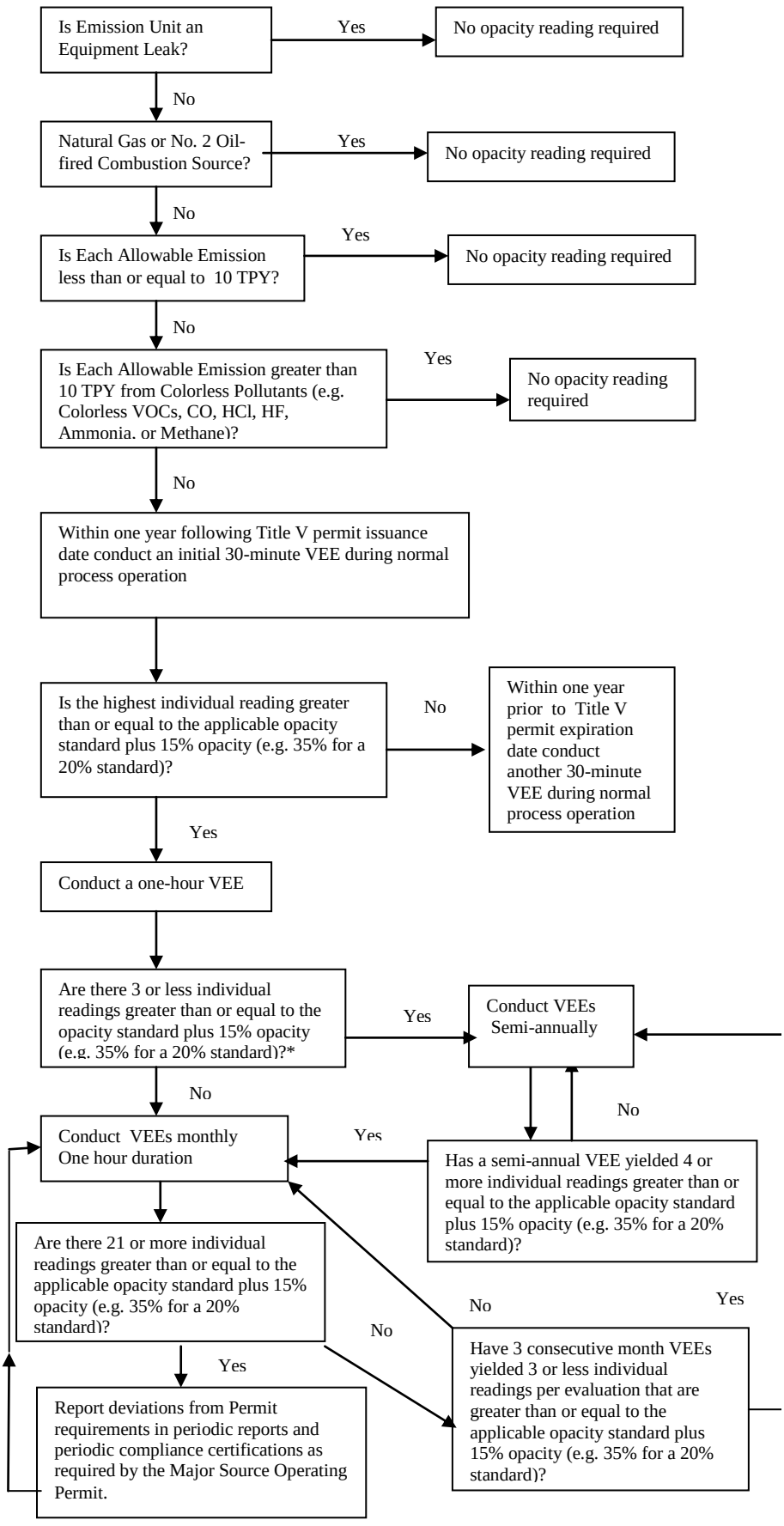
A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

Reader Error
TVEE Method 2: The TAPCD declares non-compliance when 21 observations are read at the standard plus 15% opacity (e.g. 35% for a 20% standard).

*The rationale for this is the fact that Rule 1200-03-05-.01 allows for an exemption of 5 minutes (20 readings) per hour and up to 20 minutes (80 readings) per day. With 4 or more excessive individual readings per hour the possibility of a daily exceedance exists.

Note: A company could mutually agree to have all of its sources regulated by EPA Method 9. Caution: Agreement to use Method 9 could potentially place some sources in non-compliance with visible emission standards. Please be sure before you agree.

Dated June 18, 1996
Amended September 11, 2013



OPACITY MATRIX DECISION TREE for
VISIBLE EMISSION EVALUATION METHOD 9
dated September 11, 2013

Decision Tree PM for Opacity for Sources Utilizing EPA Method 9*

Notes:

PM = Periodic Monitoring required by 1200-03-09-.02(11)(e)(iii).

This Decision Tree outlines the criteria by which major sources can meet the periodic monitoring and testing requirements of Title V for demonstrating compliance with the visible emission standards set forth in the permit. It is not intended to determine compliance requirements for EPA's Compliance Assurance Monitoring (CAM) Rule (formerly referred to as Enhanced Monitoring – Proposed 40 CFR 64).

Examine each emission unit using this Decision Tree to determine the PM required.*

Use of continuous emission monitoring systems eliminates the need to do any additional periodic monitoring.

Visible Emission Evaluations (VEEs) are to be conducted utilizing EPA Method 9. The observer must be properly certified to conduct valid evaluations.

Typical Pollutants
Particulates, VOC, CO, SO_2, NO_x, HCl, HF, HBr, Ammonia, and Methane.

Initial observations are to be repeated within 90 days of startup of a modified source, if a new construction permit is issued for modification of the source.

A VEE conducted by TAPCD personnel after the Title V permit is issued will also constitute an initial reading.

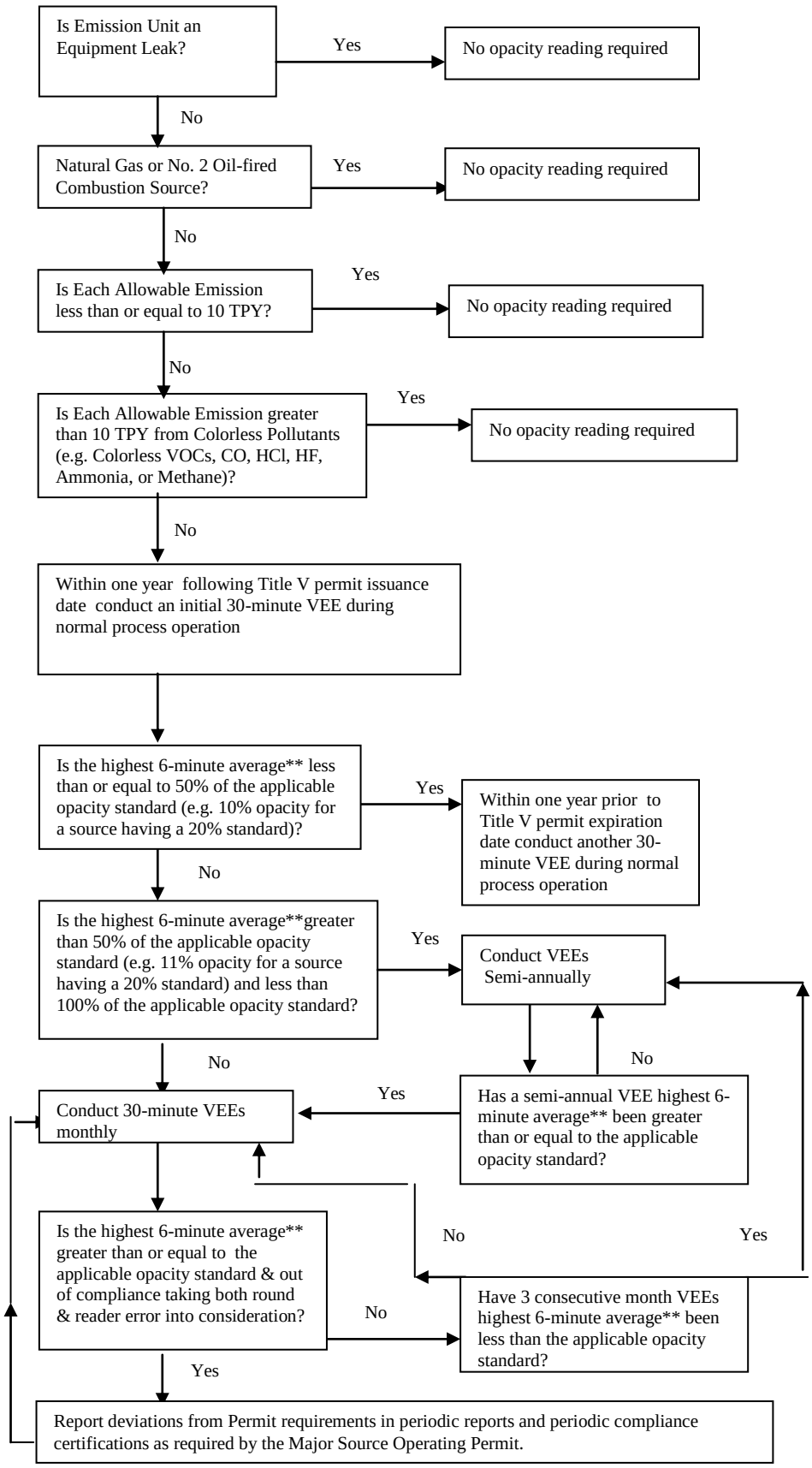
Reader Error
EPA Method 9, Non-NSPS or NESHAPS stipulated opacity standards:
The TAPCD guidance is to declares non-compliance when the highest six-minute average** exceeds the standard plus 6.8% opacity (e.g. 26.8% for a 20% standard).

EPA Method 9, NSPS or NESHAPS stipulate opacity standards:
EPA guidance is to allow only engineering round. No allowance for reader error is given.

*Not applicable to Asbestos manufacturing subject to 40 CFR 61.142

**Or second highest six-minute average, if the source has an exemption period stipulated in either the regulations or in the permit.

Dated June 18, 1996
Amended September 11, 2013



ATTACHMENT 2

THE BEAUFORT SCALE OF WIND SPEED EQUIVALENTS

Term	General Description	Limits of Velocity 33 feet (10 m) Above level ground (MPH)
Calm	Smoke rises vertically.	Under 1
	Direction of wind shown by smoke drift but not by wind vane.	1 to 3
Light	Wind felt in face; leaves rustle; ordinary vane moved by wind.	4 to 7
Gentle	Leaves and small twigs in constant motion; wind extends light flag.	8 to 12
Moderate	Raises dust and loose paper; small branches are moved.	13 to 18
Fresh	Small trees in leaf begin to sway; crested wavelets form on inland waters.	19 to 24
	Large branches in motion; whistling heard in telegraph wires; umbrellas used with difficulty.	25 to 31
Strong	Whole trees in motion; inconvenience felt in walking against wind.	32 to 38
	Breaks twigs off trees; generally impedes progress.	39 to 46
Gale	Slight structural damage occurs (chimney pot and slate removed).	47 to 54
	Trees uprooted; considerable structural damage occurs.	55 to 63
Whole Gale	Rarely experienced; accompanied by widespread damage.	64 to 75
Hurricane		Above 75

Attachment #3: General Provisions for 40 CFR 60 Subpart Dc

You are required to comply with the following General Provisions of the federal Standards of Performance for New Stationary Sources [commonly known as New Source Performance Standards (NSPS)]:

General provisions citation 40 CFR	Subject of citation	Applies to subpart	Explanation
§60.1	General applicability of the General Provisions	Yes	
§60.2	Definitions	Yes	
§60.3	Units and abbreviations	Yes	
§60.4	Address	Yes	
§60.5	Determination of construction or modification	Yes	
§60.6	Review of plans	Yes	
§60.7	Notification and Recordkeeping	Yes	
§60.8	Performance tests	Yes	
§60.9	Availability of information	Yes	
§60.10	State Authority	Yes	
§60.11	Compliance with standards and maintenance requirements	Yes	
§60.12	Circumvention	Yes	
§60.13	Monitoring requirements	Yes	
§60.14	Modification	Yes	
§60.15	Reconstruction	Yes	
§60.16	Priority list	Yes	
§60.17	Incorporations by reference	Yes	
§60.18	General control device requirements	Yes	
§60.19	General notification and reporting requirements	Yes	

TAPCR 1200-03-09-.03(8)

Attachment #4: General Provisions for 40 CFR 63 Subparts DDDDD and S.

You are required to comply with the following General Provisions of the federal National Emission Standards for Hazardous Air Pollutants (NESHAP):

General Provisions Citation 40 CFR	Subject of Citation	Applies to Subpart	Explanation
63.1	Applicability	Yes	
63.2	Definitions	Yes	
63.3	Units and Abbreviations	Yes	
63.4	Prohibited Activities and Circumvention	Yes	
63.5	Preconstruction Review and Notification Requirements	Yes	
63.6(a), (b), (c)	Compliance with Standards and Maintenance Requirements—Applicability Compliance Dates	Yes	
63.6(e)	Operation and Maintenance Requirements	Yes	
63.6(f), (g), (i), (j)	Compliance with Non-opacity Emission Standards	Yes	
63.7(a), (e), (f), (g), (h)	Performance Testing Requirements	Yes	
63.8	Monitoring Requirements	Yes	
63.9	Notification Requirements	Yes	
63.10	Recordkeeping and Reporting Requirements	Yes	
63.11	Control Device Requirements	Yes	
63.12	State Authorities and Delegations	Yes	
63.13	Addresses	Yes	
63.14	Incorporations by Reference	Yes	
63.15	Availability of Information and Confidentiality	Yes	
63.16	Performance Track Provisions	Yes	

TAPCR 1200-03-09-.03(8)

ATTACHMENT 5

Title V Fee Election form

DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower
312 Rosa L. Parks Avenue, 15th Floor, Nashville, TN 37243
Telephone: (615) 532-0554, Email: Air.Pollution.Control@TN.gov

TITLE V FEE SELECTION

Type or print and submit to the email address above.

FACILITY INFORMATION

1. Organization's legal name and SOS control number [as registered with the TN Secretary of State (SOS)]

2. Site name (if different from legal name)

3. Site address (St./Rd./Hwy.)	County name
City	Zip code

4. Emission source reference number	**5.** Title V permit number

FEE SELECTION

This fee selection is effective beginning January 1, _____. When approved, this selection will be effective until a new Fee Selection form is submitted. Fee Selection forms must be submitted on or before December 31 of the annual accounting period.

6. Payment Schedule (choose one):

Calendar Year Basis (January 1 – December 31) ☐ Fiscal Year Basis (July 1 – June 30) ☐

7. Payment Basis (choose one):

Actual Emissions Basis ☐ Allowable Emissions Basis ☐ Combination of Actual and Allowable Emissions Basis ☐

8. If Payment Basis is "Actual Emissions" or "Combination of Actual and Allowable Emissions", complete the following table for each permitted source and each pollutant for which fees are due for that source. See instructions for further details.

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

8. (Continued)

Source ID	Pollutant	Allowable or Actual Emissions	If allowable emissions: Specify condition number and limit. If actual emissions: Describe calculation method and provide example. Provide condition number that specifies method, if applicable.

CONTACT INFORMATION (BILLING)

9. Billing contact			Phone number with area code
Mailing address (St./Rd./Hwy.)			Fax number with area code
City	State	Zip code	**Email address**

SIGNATURE BY RESPONSIBLE OFFICIAL

Based upon information and belief formed after reasonable inquiry, I, as the responsible person of the above mentioned facility, certify that the information contained in the submittal is accurate and true to the best of my knowledge. As specified in TCA Section 39-16-702(a)(4), this declaration is made under penalty of perjury.

10. Signature		Date
Signer's name (type or print)	**Title**	Phone number with area code