

1 BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY
2 OF THE STATE OF OREGON
3

4 IN THE MATTER OF)
International Paper Company)
5 Springfield Mill)
6)
 Permittee.) ORDER NO. 208850

7 Permittee (International Paper Company - Springfield Mill), Lane Regional Air
8 Protection Agency (LRAPA), and the Department of Environmental Quality (DEQ) hereby agree
9 that:
10

11 WHEREAS:

12 1. Permittee operates a pulp and paper mill located at 801 42nd Street in Springfield,
13 Oregon (the Facility).

14 2. On June 30, 2005, LRAPA issued Title V Operating Permit No. 208850 (the Permit)
15 to Permittee.

16 3. On December 14, 2012, LRAPA renewed the Permit.

17 4. The Permit authorizes Permittee to discharge air contaminants associated with its
18 operation of the Facility in conformance with the requirements, limitations, and conditions set forth
19 in the Permit.

20 5. As of December 31, 2017, the Permit had the following Plant Site Emission Limits
21 (PSELs) for sulfur dioxide (SO₂), particulate matter of ten microns or less (PM₁₀), and nitrogen
22 oxides (NO_x), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the
23 Facility: 1,521 tons per year for SO₂, 750 tons per year for PM₁₀ and 1,692 tons per year for NO_x
24 (as 12-month rolling averages).

25 6. The Facility is located 58.9 kilometers from Three Sisters Wilderness Area, which is
26 the nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility
27 to the Class I Area.

1 8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the
2 State Implementation Plan under the federal Clean Air Act.

3 9. Permittee waives any and all rights and objections Permittee may have to the form,
4 content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial
5 review of the SAFO.

6 10. In the event EPA does not accept DEQ's Round II Regional Haze State
7 Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final
8 Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to
9 ensure compliance with the Round II Regional Haze SIP.

10 11. This SAFO shall be binding on Permittee and its respective successors, agents, and
11 assigns. The undersigned representative of Permittee certifies that he, she, or they are fully
12 authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or
13 partnership status of Permittee, or change in the ownership of the properties or businesses affected
14 by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise
15 approved in writing by DEQ through an amendment to this SAFO.

16 12. If any event occurs that is beyond Permittee's reasonable control and that causes or
17 may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must
18 immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the
19 measures that Permittee has or will take to prevent or minimize the delay or deviation, and the
20 timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in
21 writing this information within five (5) business days of the onset of the event. It is Permittee's
22 responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or
23 deviation has been or will be caused by circumstances beyond the control and despite due diligence
24 of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related
25 activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control
26 include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work
27 stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a consultant's

1 failure to provide timely reports are not considered circumstances beyond Permittee's control.

2 13. Facsimile or scanned signatures on this SAFO shall be treated the same as original
3 signatures.

4 II. FINAL ORDER

5 The DEQ hereby enters a final order requiring Permittee to comply with the following
6 schedule and conditions:

- 7 1. On and after July 31, 2022, the Permittee's combined assigned PSELs for the Power
8 Boiler, Package Boiler, Lime Kilns and Recovery Furnace for the following
9 pollutants are:
 - 10 a. 237 tons per year for SO₂, as a 12-month rolling average.
 - 11 b. 962 tons per year for NO_x, as a 12-month rolling average.
 - 12 c. 177 tons per year for PM₁₀, as a 12-month rolling average.
- 13 2. Permittee agrees that the only fuel that it may combust in the Power Boiler and
14 Package Boiler at the facility is natural gas, except that it may operate the Power
15 Boiler and Package Boiler on ultra-low sulfur diesel for no more than 48 hours per
16 year and when needed for natural gas curtailments.
- 17 3. Permittee agrees that the only fuels that it may combust in the Recovery Furnace are
18 Black Liquor Solids (BLS) and natural gas, except that it may operate the Recovery
19 Furnace on ultra-low sulfur diesel no more than 48 hours per year and when needed
20 for natural gas curtailment.
- 21 4. Permittee agrees that the only fuels that it may combust in the Lime Kilns are natural
22 gas, product turpentine and product methanol, except that it may operate the Lime
23 Kilns on ultra-low sulfur diesel no more than 48 hours per year and when needed for
24 natural gas curtailment.
- 25 5. By December 31, 2022, Permittee shall install CEMS and measure the emissions of
26 NO_x from the Power Boiler. Permittee shall install the CEMS according to the
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1 installation, quality control, and quality assurance requirements detailed in the
2 following:

- 3 a. Permittee shall demonstrate proper installation of the CEMS following EPA
4 Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1), Performance
5 Specification 2 (see 40 CFR 60, Appendix B, Performance Specification 2), and
6 DEQ Source Sampling Manual, Rev. 2018, no later than March 31, 2023.
- 7 b. Permittee shall submit data collected during testing identified in Section II.5 to
8 DEQ and LRAPA for review.
- 9 c. Upon DEQ's and LRAPA's approval of the CEMS certification, Permittee shall
10 use data collected from the CEMS to demonstrate compliance with the NOx
11 emissions rates in Section II.6 & 7.
- 12 d. Permittee shall ensure that the CEMS are certified by DEQ and LRAPA no later
13 than May 31, 2023.
- 14 e. Permittee shall use the CEMS to document Power Boiler emissions, replacing
15 the equation in Condition 186.g in the LRAPA permit that requires monitoring
16 of the Power Boiler NOx, no later than May 31, 2023.
- 17 f. Permittee shall collect and record all data from the NOx CEMS and make that
18 data available to DEQ and/or LRAPA upon request.
- 19 6. On and after January 31, 2025, Permittee shall meet the following emission limit:
- 20 a. 0.25 lb NOx/MMBtu on a 7-day rolling average from the Power Boiler
- 21 7. On and after December 31, 2025, the Permittee's assigned PSEL for the following
22 pollutants and Emission Unit is:
- 23 a. 179 tons per year for NOx, as a 12-month rolling average for the Power Boiler.

24
25 8/9/2021
26 Date

International Paper (PERMITTEE)

Signature

Name (print)

Title (print)

1
2 LANE REGIONAL AIR PROTECTION AGENCY

3 8-9-21
4 Date

5 Steven A. Dietrich
6 Steven A. Dietrich, Director

7 DEPARTMENT OF ENVIRONMENTAL QUALITY and
8 ENVIRONMENTAL QUALITY COMMISSION

9 8/9/2021
10 Date

11 Ali Mirzakhali
12 Ali Mirzakhali, Administrator
13 Air Quality Division
14 on behalf of DEQ pursuant to OAR 340-223-0110(2)
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