LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)
TITLE V OPERATING PERMIT

1010 Main Street
Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
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~~Issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.~~

ISSUED TO:

International Paper Company
Springfield Mill
P.O. Box 700
Springfield, Oregon 97477

INFORMATION RELIED UPON

Application Number: 61828
Received: 08/31/16

PLANT SITE LOCATION:
801 42nd Street
Springfield, Oregon 97478

LAND USE COMPATIBILITY STATEMENT:

From: City of Springfield
Dated: September 30, 1997

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

OCT - 4 2016
Date

Nature of Business: Kraft Pulping and Containerboard Manufacturing
Primary SIC: 2631 -- Paperboard Mills
Secondary SIC: 4911 -- Electrical Power Generation

RESPONSIBLE OFFICIAL:

Title: Mill Manager

FACILITY CONTACT PERSON:
Name: Laura Seyler
Title: Air Quality Supervisor
Phone: (541) 741-5824

Addendum No. 3
Significant Permit Modification

In accordance with OAR 340-218-0150(1)(h) and 340-218-0180(1)(e), Title V Operating Permit No. 208850 is hereby amended to incorporate into the Title V Operating Permit the Construction ACDP issued July 8, 2016.

Pages 2-105 redacted -- outside the scope of the SIP

PLANT SITE EMISSION LIMIT MONITORING [OAR 340-218-0050(3)(a)]

186. The permittee shall determine compliance with the Plant Site Emission Limits established in Condition 185 of this permit by conducting monitoring in accordance with the following procedures, test methods, and frequencies: [OAR 340-218-0050(3)(a)]

186.a. The permittee shall maintain annual records of the following process parameters:

Table 27. Plant Site Emission Limit Monitoring and Testing

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
EU-150A	CO	Natural Gas Usage	MMBtu	1.40E-2	lb/MMBtu	Method 10	Once/Term
Power Boiler	CO	#4 and/or #6 Oil/Used Oil Usage	MMBtu	9.6000E-2	lb/MMBtu	Method 10 if throughput >50% of PSEL calculation basis in any year, or if actual throughput < 50% then recordkeeping & fuel emission factor calculation.	Once/term if oil usage > 50% of PSEL throughput calculation in any year., otherwise not required, Condition 187.d
	NO_x	Natural Gas Usage	MMBtu	Formula utilized as per Condition 186.g	lb/MMBtu	Method 7E	Once/Term
	NO_x	#4, #2 and/or #6 Oil	MMBtu	4.20E-1	lb/MMBtu	Method 7E or equivalent if throughput >50% of PSEL calculation basis in any year, or if actual throughput < 50% then recordkeeping & fuel emission factor calculation.	Once/term if oil usage > 50% of PSEL throughput calculation in any year, otherwise not required Condition 187.d
	NO_x	Used Oil	MMBtu	4.20E-1	lb/MMBtu	Recordkeeping and fuel emission factor calculation or Condition 187.d	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	$PM/PM_{10}/PM_{2.5}$	Natural Gas Usage	MMBtu	*2.500E-3	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	#4 and/or #6 Oil	MMBtu	0.128/0.110/0.0748	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Used Oil	MMBtu	1.6E-1/1.6E-1/0.0748	lb/MMBtu	Not Required	
	Pb	#4 and/or #6 Oil	MMBtu	1.00E-5	lb/MMBtu	Not Required	
	Pb	Used Oil	MMBtu	2.8E-3	lb/MMBtu	Not Required	
	SAM	#4 and/or #6 Oil	MMBtu	3.96E-2	lb/MMBtu	Not Required	
	SAM	Used Oil	MMBtu	3.000E-2	lb/MMBtu	Not Required	
	SO_2	Natural Gas Usage	MMBtu	6.000E-4	lb/MMBtu	Not Required	
	SO_2	#2 Oil	MMBtu	5.05E-1	lb/MMBtu	Method 6 or 6C or material balance	Annually
	SO_2	#4 and/or #6 Oil	MMBtu	1.84	lb/MMBtu	Method 6 or 6C or material balance	Annually
	SO_2	Used Oil	MMBtu	8.4E-1	lb/MMBtu	Method 6 or 6C or material balance	Annually
	$VOC_{as\ propane}$	Natural Gas Usage	MMBtu	1.700E-3	lb/MMBtu	Not Required	
	$VOC_{as\ propane}$	#2 Oil	MMBtu	2.20E-3	lb/MMBtu	Not Required	
	$VOC_{as\ propane}$	#4 and/or #6 Oil	MMBtu	6.140E-3	lb/MMBtu	Not Required	
	$VOC_{as\ propane}$	Used Oil	MMBtu	1.73E-3	lb/MMBtu	Not Required	
EU-150B	CO	Natural Gas Usage	MMBtu	1.40E-1	lb/MMBtu	Method 10	Once/Term
Package Boiler	CO	#2 Oil/Used Oil Usage	MMBtu	3.210E-1	lb/MMBtu	Method 10	Once/term if oil usage > 50 % of PSEL throughput assumption in any calendar year of term, where 50% level equals 130,600 MM BTU/year, or 926,000 gal No.2 Fuel Oil, based on year 2000 Title V Application..

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	NO_x	Natural Gas Usage	MMBtu	2.000E-1	lb/MMBtu	CEMS Data	Continuously
	NO_x	#2 Oil/Used Oil Usage	MMBtu	2E-1	lb/MMBtu	CEMS Data	Continuously
	Pb	#2 Oil	MMBtu	1E-5	lb/MMBtu	Not Required	
	Pb	Used Oil	MMBtu	3E-3	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Natural Gas Usage	MMBtu	*5.00E-3	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	#2 Oil	MMBtu	4.0E-02/4.0E-02/2.68E-02	lb/MMBtu	Not Required (see Condition 159.a)	No further testing required per Condition 159.a
	$PM/PM_{10}/PM_{2.5}$	Used Oil	MMBtu	1.6E-01/1.6E-01/1.09E-01	lb/MMBtu	Not Required (see Condition 159.a	No further testing required per Condition 159.a
	SAM	#2 Oil	MMBtu	2E-2	lb/MMBtu	Not Required	
	SAM	Used Oil	MMBtu	3E-2	lb/MMBtu	Not Required	
	SO_2	Natural Gas Usage	MMBtu	6.000E-4	lb/MMBtu	Not Required	
	SO_2	#2 Oil/Used Oil Usage	MMBtu	5.6E-1	lb/MMBtu	Method 6 or 6C or material balance	Annually
	$VOC_{as\ propane}$	Natural Gas Usage	MMBtu	1.037E-2	lb/MMBtu	Not Required	
	$VOC_{as\ propane}$	#2 Oil/Used Oil Usage	MMBtu	2.200E-2	lb/MMBtu	Not Required	
EU-185 ETS FU185-000	$VOC_{as\ propane}$	Pulp - Unbleached	adt	9.869E-2 1.20E-1 as propane	lb/adt	Not Required	
	TRS	Paper	adt	8.26E-4	lb/adt	Not Required	
EU-275A Road Fugitives	$PM/PM_{10}/PM_{2.5}$	Hours of Operation	hours	1.32/3.55E-1/3.55E-02	lb/hr-opr	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
EU-275C Other Source TRS FU401-098	$VOC_{as\ propane}$ Controlled	Pulp - Unbleached	adt	0.2466	lb/adt	EPA Method 25A for VOC as propane -Concurrent Testing on Condenser Inlet and Outlet (Percent Efficiency)	Once by December 31, 2017 (in addition to 5/8/15 testing)
	$VOC_{as\ propane}$ Uncontrolled	Pulp - Unbleached	adt	5.430	lb/adt	EPA Method 25A for VOC as propane	Once by December 31, 2017 (in addition to 5/8/15 testing)
	TRS	Pulp - Unbleached	adt	0.001110	lb/adt	Method 16, 16A, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141.
PS410-999	TRS	Pulp - Unbleached	adt	4.210E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.75E-1	lb/adt	Not Required	
PS420-999	TRS	Pulp - Unbleached	adt	0.0549	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.122	lb/adt	Not Required	
TA186-120	TRS	Pulp - Unbleached	adt	1.310E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	6.050E-3	lb/adt	Not Required	
TA440-003	TRS	Pulp - Unbleached	adt	1.500E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	6.185E-2	lb/adt	Not Required	
TA440-004	TRS	Pulp - Unbleached	adt	6.19-E-4	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ C}$	Pulp - Unbleached	adt	1.830E-3	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
TA440-067	TRS	Pulp - Unbleached	adt	4.400E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	SO_2	Pulp - Unbleached	adt	2.000E-2	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	8.54E-2	lb/adt	Not Required	
TA441-050	TRS	Pulp - Unbleached	adt	3.200E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	SO_2	Pulp - Unbleached	adt	2.000E-2	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	9.289E-3	lb/adt	Not Required	
TA445-300	CO	Pulp - Unbleached	adt	5.990E-4	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	4.200E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	2.586E-3	lb/adt	Not Required	
TA445-530	CO	Pulp - Unbleached	adt	1.380E-4	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	1.730E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	2.590E-3	lb/adt	Not Required	
EU-275D Additional Other Source TRS w/Title V EQ420-070	TRS	Pulp - Unbleached	adt	0.000580	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.0023	lb/adt	Not Required	
EQ455-009	PM/PM_{10}	Pulp - Unbleached	adt	6E-3/5E-3	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	2.650E-3	lb/adt	Method 16, 16a, or 16B Condition 141)	Annually if > 3%/10% per Condition 141

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	3.820E-2	lb/adt	Not Required	
EQ-456-008	PM/PM_{10}	Pulp - Unbleached	adt	4.72E-3/4.22E-3	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	1.230E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	4.440E-2	lb/adt	Not Required (not quantifiable)	
FA400-084	TRS	Pulp - Unbleached	adt	8.600E-2	lb/adt	Method 16, 16a, or 16B	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	4.88E-1	lb/adt	Not Required	
TA186-140	TRS	Pulp - Unbleached	adt	4.15E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	5.856E-3	lb/adt	Not Required	
TA420-014	TRS	Pulp - Unbleached	adt	2.500E-3	lb/at	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	5.86E-3	lb/adt	Not Required	
TA443-082	TRS	Pulp - Unbleached	adt	5.200E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.098E-2	lb/adt	Not Required	
TA455-007	PM/PM_{10}	Pulp - Unbleached	adt	8.96E-3/8.02E-3	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	1.19E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	Adt	1.46E-5	lb/adt	Not Required	
TA455-010	TRS	Pulp - Unbleached	adt	4.17E-4	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	3.90E-3	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
TA455-014	TRS	Pulp - Unbleached	adt	7.92E-4	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	2.56E-3	lb/adt	Not Required	
TA456-007	PM/PM_{10}	Pulp - Unbleached	adt	0.00704/0.00630	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	1.46E-2	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	6.620E-2	lb/adt	Method 25A, 25B (if taken out of service, then not required)	Once/term (if taken out of service, then not required)
TA456-011	TRS	Pulp - Unbleached	adt	8.2E-3	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	3.172E-4	lb/adt	Not Required (already tested)	None
TA456-013	TRS	Pulp - Unbleached	adt	1.130E-5	lb/adt	Method 16, 16a, or 16B (Condition 141)	Annually if > 3%/10% per Condition 141
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	9.028E-5	lb/adt	Not Required (already tested)	None
EU-310 Chip Handling FU310-999	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	8.87E-3/4.19E-3/2.1E-03	lb/adt	Not Required	None
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	5.57E-1 as propane	lb/adt	Not Required	None
EU-320	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	6.3E-3/2.99E-3/4.49E-4	lb/adt	Not Required	
Chip Storage FU320-999	$VOC_{as\ propane}$	Pulp - Unbleached	adt	9.76E-3 as propane	lb/adt	Not Required	
EU-330	PM	Fines – Bone Dry Tons (BDT)	BDT	0.1	lb/BDT	Not Required	
Fines System	PM_{10}	Fines – Bone Dry Tons (BDT)	BDT	0.095	lb/BDT	Not Required	
	$PM_{2.5}$	Fines – Bone Dry Tons (BDT)	BDT	0.08	lb/BDT	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	VOC	Fines – Bone Dry Tons (BDT)	BDT	0.049 as propane	lb/BDT	Not Required	
EU-402 New Fiber Line FU402-100	$PM/PM_{10}/PM_{2.5}$	Pulp - New Fiber	adt	0.0490/0.0230/3.45E-03	lb/adt	Not Required	
FU402-101	$PM/PM_{10}/PM_{2.5}$	Pulp - New Fiber	adt	0.0490/0.0230/3.45E-03	lb/adt	Not Required	
FU402-350	$VOC_{as\ propane}$	Pulp - New Fiber	adt	4.721E-2	lb/adt	Not Required	
PS402-300	$VOC_{as\ propane}$	Pulp - New Fiber	adt	5.40E-2	lb/adt	Not Required	
PS402-400	$VOC_{as\ propane}$	Pulp - New Fiber	adt	3.68E-2	lb/adt	Not Required	
PS402-401	NOx	Pulp - New Fiber	adt	2.72E-1	lb/adt	Not Required	
PS402-401	CO	Pulp - New Fiber	adt	3.96	lb/adt	Method 10	Once/Term
PS402-401	$VOC_{as\ carbon}$	Pulp - New Fiber	adt	7.503E-01	lb/adt	Method 10	Once/Term
TA402-221	NO_x	Pulp - New Fiber	adt	1.810E-1	lb/adt	Method 7E	Once/Term
	$PM/PM_{10}/PM_{2.5}$	Pulp - New Fiber	adt	4.77/4.77/7.16E-01	lb/adt	DEQ Method 5	Twice/Term
	SO_2	Pulp - New Fiber	adt	8.210E-4	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - New Fiber	adt	3.599E-1	lb/adt	Method 25A, 25B	Once/Term
	CO	Pulp -New Fiber	adt	6.700E-2	lb/adt	Not Required	
	TRS	Pulp - New Fiber	adt	1.276E-4	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - New Fiber	adt	5.61E-3	lb/adt	Not Required	
TA402-999	$VOC_{as\ propane}$	Pulp - New Fiber	adt	1.02E-1	lb/adt	Not Required	None
EU-410 Batch Digesters	$VOC_{as\ propane}$	Pulp - Unbleached	adt	3.28E-3	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
TA400-002							
TA410-045	$VOC_{as\ propane}$	Hours of Operation	hours	2.350E-1	lb/adt	Not Required	
TA410-046	$VOC_{as\ propane}$	Pulp - Unbleached	adt	2.68E-4	lb/adt	Not Required	
TA410-058	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.62E-2	lb/adt	Not Required	
EU-420 Kamyr Digester EQ420-050	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.0233	lb/adt	Not Required	
TA420-035	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.0074	lb/adt	Not Required	
TA420-037	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.01	lb/adt	Not Required	
TA420-045	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.03	lb/adt	Not Required	
TA420-059	$VOC_{as\ propane}$	Pulp -zzunbleached	adt	0.012	lb/adt	Not Required	
	CO	Pulp - Unbleached	adt	0.00265	lb/adt	Not Required	
TA420-109	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.01	lb/adt	Not Required	
EU-440 Evap/Rec Tank FU441-999	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	2.080E-3/1.870E-3/9.35E-04	lb/adt	Not Required	
TA155-020	$VOC_{as\ propane}$	Pulp - Unbleached	adt	0.00074	lb/adt	Not Required	
TA445-001	CO	Pulp - Unbleached	adt	3.130E-5	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp -Unbleached	adt	5.88E-4	lb/adt	Not Required	
TA445-002	CO	Pulp - Unbleached	adt	3.430E-5	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	6.44E-4	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
TA445-651	CO	Pulp - Unbleached	adt	2.500E-4	lb/adt	Not Required	
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	4.64E-3	lb/adt	Not Required	
EU-445A Rec #3 (EQ445-014)	CO	Pulp - Unbleached	adt	0.12	lb/adt	Method 10	Once/Term
	CO	Natural Gas	MMBtu	8.7E-2	Lb/MMBtu	Method 10	Once/Term
	NO_x	Pulp - Unbleached	adt	1.22	lb/adt	Method 7E	Once/Term
	NO_x	Natural Gas Usage	MMBtu	2.733E-1	lb/MMBtu	Not Required	
	NO_x	#6 Oil Usage	MMBtu	3.10E-1	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	1.03/0.827/7.44E-01	lb/adt	DEQ Method 5 per Condition 83	3 mos or 6 mos per Condition 83
	SAM	#6 Oil Usage	MMBtu	8.000E-2	lb/MMBtu	Not Required	
	SAM	Pulp - Unbleached	adt	1.140E-2	lb/adt	Not Required	
	SO_2	Natural Gas Usage	MMBtu	6.000E-4	lb/MMBtu	Not Required	
	SO_2	#6 Oil Usage	MMBtu	1.82	lb/MMBtu	Not Required	
	SO_2	Pulp - Unbleached	adt	3.8	lb/adt	Method 6 or 6C or CEMs (see Condition 86)	Once/Month (see Condition 86)
	TRS	Pulp - Unbleached	adt	1.2E-1	lb/adt	CEMS data (see Condition 81)	Continuously
	$VOC_{as\ propane}$	Pulp-Unbleached	adt	1.56E-1	lb/adt	Not Required (tested already)	
EU-445B #3 SDT East (TA445-038)	NO_x	Pulp - Unbleached	adt	2.750E-2	lb/adt	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	1.690E-1/1.270E-1/1.38E-01	lb/adt	DEQ Method 5 (see Condition 136)	3 mos/6 mos (see Condition 136)
	SO_2	Pulp - Unbleached	adt	3.000E-2	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	TRS	Pulp - Unbleached	adt	1.660E-2	lb/adt	Method 16, 16a, or 16B (See Condition 136)	3 mos/6 mos (see Condition 136)
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	4.758E-2	lb/adt	Not Required	
EU-445B # 3 SDT West (TA445-045)	NO_x	Pulp - Unbleached	adt	2.750E-2	lb/adt	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	1.42E-1/1.270E-1/1.38E-01	lb/adt	DEQ Method 5 sSee Condition 136)	3 mos/6 mos (see Condition 136)
	SO_2	Pulp - Unbleached	adt	3.000E-2	lb/adt	Not Required	
	TRS	Pulp - Unbleached	adt	2.750E-2	lb/adt	Method 16, 16a, or 16B (See Condition 136)	3 mos/6 mos (see Condition 136)
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	4.758E-2	lb/adt	Not Required	
EU-445C Rec #4 (EQ445-321)	CO	Natural Gas Usage	MmBtu	8.7E-2	Lb/MMBtu	Method 10	Once/Term
	CO	Pulp - Unbleached	adt	1.28	lb/adt	Method 10	Once/Term
	NO_x	Pulp - Unbleached	adt	1.53	lb/adt	Method 7E	Once/Term
	NO_x	Natural Gas Usage	MMBtu	2.733E-1	lb/MMBtu	Not Required	
	NO_x	#6 Oil Usage	MMBtu	4.430E-1	lb/MMBtu	Not Required	
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	0.55/4.95E-01/4.95E-01	lb/adt	DEQ Method 5 (see Condition 98)	3 Mos or 6 Mos (See Condition 98)
	SAM	#6 Oil Usage	MMBtu	3.3E-2	lb/MMBtu	Not Required	
	SAM	Pulp - Unbleached	adt	5.700E-2	lb/adt	Not Required	
	SO_2	#6 Oil Usage	MMBtu	1.82	lb/MMBtu	Not Required	
	SO_2	Pulp - Unbleached	adt	0.3	lb/adt	Method 6 Or 6C or CEMS (see Condition 101)	Once/Month (dee Condition 101)
	TRS	Pulp - Unbleached	adt	1.2E-1	lb/adt	CEMS Data (see Condition 96)	Continuously (See Condition 96)

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.39E-1	lb/adt	Not Required	
EU-445D #4 SDT (TA445-350)	NO_x	Pulp - Unbleached	adt	4.01E-2	lb/adt	Method 7E	Once/term
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	1.6E-1/1.6E-1/1.46E-01	lb/adt	DEQ Method 5	3 mos/6 mos
	SO_2	Pulp - Unbleached	adt	1.832E-2	lb/adt	Method 6 Or 6C	Once/term
	TRS	Pulp - Unbleached	adt	6.700E-2	lb/adt	Method 16, 16a, or 16B	3 mos/6 mos
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	9.516E-2	lb/adt	Not Required	None
EU-455 Lime Kilns (PS455-999)	CO	Pulp - Unbleached	adt	2.0E-1	lb/adt	Method 10	Once/Term
	NO_x	Pulp - Unbleached	adt	2.400E-1	lb/adt	Method 7E	Once/Term
	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	7.2E-2/7.2E-2/6.77E-02	lb/adt	DEQ Method 5 (see Condition 127)	6 mos. (see Condition 127)
	Pb	Pulp - Unbleached	adt	2.360E-5	lb/adt	Not Required	
	SAM	Pulp - Unbleached	adt	6.7E-3	lb/adt	Not Required	
	SO_2	Pulp - Unbleached	adt	5.73E-1	lb/adt	Method 6 or 6C or CEM	Twice/Term
	TRS	Pulp - Unbleached	adt	3E-2	lb/adt	CEMS data (see Condition 124)	Continuously (see Condition 124)
	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.464E-2	lb/adt	Not Required	
EU-456 Recaust System FU456-999A	$PM/PM_{10}/PM_{2.5}$	Pulp - Unbleached	adt	0.0052/0.0047/2.35E-03	lb/adt	Not Required	
GE454-052	$VOC_{as\ propane}$	Pulp-Unbleached	adt	9.39E-04	lb/adt	Not Required	
GE455-153	$VOC_{as\ propane}$	Pulp - Unbleached	adt	1.421E-02	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
PU455-056	VOC as propane	Pulp - Unbleached	adt	3.538E-04	lb/adt	Not Required	
TA454-016	VOC as propane	Pulp - Unbleached	adt	2.318E-04	lb/adt	Not Required	
TA454-099	VOC as propane	Pulp - Unbleached	adt	4.67E-04	lb/adt	Not Required	
TA454-100	VOC as propane	Pulp - Unbleached	adt	4.67E-04	lb/adt	Not Required	
TA455-001	VOC as propane	Pulp - Unbleached	adt	1.464E-03	lb/adt	Not Required	
TA455-012	VOC as propane	Pulp - Unbleached	adt	6.71E-06	lb/adt	Not Required	
TA455-018	VOC as propane	Pulp - Unbleached	adt	1.464E-03	lb/adt	Not Required	
TA455-025	VOC as propane	Pulp - Unbleached	adt	4.148E-04	lb/adt	Not Required	
TA455-050	VOC as propane	Pulp - Unbleached	adt	4.514E-03	lb/adt	Not Required	
TA455-158	VOC as propane	Pulp - Unbleached	adt	1.196E-04	lb/adt	Not Required	
TA455-165	VOC as propane	Pulp - Unbleached	adt	7.174E-06	lb/adt	Not Required	
TA456-001	VOC as propane	Pulp - Unbleached	adt	1.464E-03	lb/adt	Not Required	
TA456-009	VOC as propane	Pulp - Unbleached	adt	7.320E-04	lb/adt	Not Required	
TA456-015	VOC as propane	Pulp - Unbleached	adt	1.061E-04	lb/adt	Not Required	
TA456-020	VOC as propane	Pulp - Unbleached	adt	1.464E-03	lb/adt	Not Required	
TA456-027	VOC as propane	Pulp - Unbleached	adt	1.220E-03	lb/adt	Not Required	
TA456-028	VOC as propane	Pulp - Unbleached	adt	4.148E-04	lb/adt	Not Required	
TA456-028A	VOC as propane	Pulp - Unbleached	adt	9.882E-04	lb/adt	Not Required	
TA456-036	VOC as propane	Pulp - Unbleached	adt	4.148E-04	lb/adt	Not Required	
TA456-128	VOC as propane	Pulp - Unbleached	adt	9.33E-04	lb/adt	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
EU-600 Paper Recycle FA601-121	$VOC_{as\ propane}$	OCC	adt	2.07E-02	lb/adt	Not Required	
FA601-255	$VOC_{as\ propane}$	OCC	adt	7.66E-03	lb/adt	Not Required	
TA601-012	$VOC_{as\ propane}$	OCC	adt	1.15E-03	lb/adt	Not Required	
TA601-134	TRS	Hours of Operation	hours	6.900E-4	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	1.745E-1	lb/hr-opr	Not Required	
TA601-142	TRS	Hours of Operation	hours	3.450E-4	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	2.62E-2	lb/hr-opr	Not Required	
TA601-167	TRS	OCC	adt	5.250E-4	lb/adt	Not Required	
	$VOC_{as\ propane}$	OCC	adt	2.96E-2	lb/adt	Not Required	
EU-715A #2 MR - Wet FA705-032	TRS	Paper	Adt	2.640E-4	lb/adt	Not Required	
	$VOC_{as\ propane}$	Paper	Adt	1.95E-2	lb/adt	Not Required	
FA705-107	TRS	Paper	Adt	2.980E-5	lb/adt	Not Required	
	$VOC_{as\ propane}$	Paper	Adt	3.404E-3	lb/adt	Not Required	
FA705-174	TRS	Paper	Adt	1.490E-7	lb/adt	Not Required	
	$VOC_{as\ propane}$	Paper	Adt	1.72E-4	lb/adt	Not Required	
FU710-999	$PM/PM_{10}/PM_{2.5}$	Paper	Adt	1.320E-2/1.320E-2/6.6E-03	lb/admt	Not Required	
PS715-999A	TRS	Paper	Adt	1.190E-2	lb/adt	Not Required	
	$VOC_{as\ propane}$	Paper	Adt	3.892E-1	lb/adt	Not-Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
TA705-002	TRS	Hours of Operation	hours	1.500E-3	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	1.16E-1	lb/hr-opr	Not Required	
TA705-003	TRS	Hours of Operation	hours	5.000E-3	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	3.77E-1	lb/hr-opr	Not Required	
TA705-093	TRS	Hours of Operation	hours	1.500E-3	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	1.16E-1	lb/hr-opr	Not Required	
TA705-094	TRS	Hours of Operation	hours	1.720E-1	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	3.86	lb/hr-opr	Sample and test for machine whitewater system methanol concentration. Emission factor assumes liquid methanol concentration less than 67ppm.	Once per year during first permit term.
TA705-099	TRS	Hours of Operation	hours	3.370E-1	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	3.86	lb/hr-opr	Sample and test for machine whitewater system methanol concentration. Emission factor assumes liquid methanol concentration less than 67ppm.	Once per year during first permit term.
TA705-130	TRS	Hours of Operation	hours	1.720E-10E-1	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	3.86	lb/hr-opr	Sample and test for machine whitewater system methanol concentration. Emission factor assumes liquid methanol concentration less than 67ppm.	Once per year during first permit term.
TA705-208	TRS	Hours of Operation	hours	3.000E-3	lb/hr-opr	Not Required	
	$VOC_{as\ propane}$	Hours of Operation	hours	2.24E-1	lb/hr-opr	Not Required	
TA705-215	TRS	Hours of Operation	hours	1.500E-3	lb/hr-opr	Not Required	

EU ID	Pollutant	Process Parameter	Units	Annual EF	Units	Test Methods *(see Condition187)*	Frequency
	$VOC_{as\ propane}$	Hours of Operation	hours	1.12E-1	lb/hr-opr	Not Required	
EU-715B #2 MR – Dry FA730-104	$PM/PM_{10}/PM_{2.5}$	Paper	adt	1.548E-3/1.548E-3/7.74E-04	lb/adt	Not Required	
PS715-999B	TRS	Paper	adt	1.460E-2	lb/adt	Not Required	
	$VOC_{as\ propane}$	Paper	adt	3.892E-1	lb/adt	Not Required	
VA730-025	$PM/PM_{10}/PM_{2.5}$	Paper	adt	4.190E-4/4.190E-4/2.10E-04	lb/adt	Not Required	

186.b. For the emissions units listed in the table above (Table 27), the permittee shall determine compliance with the annual 12-month rolling PSELs for all pollutants except GHGs by multiplying the process parameter by the emission factor listed above for each pollutant with the exception of calculations provided for in Conditions 186.c, 186.d, 186.e, and 186.f.

$$E = (P_{eu} \times EF_{eu}) / k$$

where:

E	=	Emissions, or tons/year
P_{eu}	=	Process parameter for each emissions unitunits/year
EF_{eu}	=	Emission factor for each emissions unit, pounds/units
k	=	Conversion factor, (1 lb/lb, 2000 lbs/ton)

186.c. In determining compliance with the annual 12-month rolling PSELs, the permittee shall determine emissions attributable to the burning of liquid fuel oil using a material balance with the following equation to calculate the SO_2 emissions:

$$E = 2SF$$

where:

E	=	emissions of sulfur dioxide tons/year;
S	=	sulfur content, (wt/wt) (as determined by Condition 18)
F	=	fuel used, lbs/day or tons/yr; and
2	=	$\frac{64 \text{ lbs } SO_2/\text{mole}}{32 \text{ lbs S/mole}}$

186.d. The real-time TRS CEM data for emissions units EU-445A, EU-445C and EU-455 shall be incorporated into the TRS emissions calculation performed in accordance with Condition 186.b for monitoring compliance with the facility-wide TRS PSEL.

186.e. The real-time NO_x CEM data for emissions unit EU-150B shall be incorporated into the NO_x emissions calculation performed in accordance with Condition 186.b for monitoring compliance with the facility-wide NO_x PSEL.

186.f. The real-time SO_2 CEM data for emissions units EU-445A, EU-445C and EU-455 may be incorporated into the SO_2 emissions calculation performed in accordance with Condition 186.b for monitoring compliance with the facility-wide SO_2 PSEL, if the permittee chooses the monitoring alternative under Conditions 86.d, 101.c, or 123, and the CGA (cylinder gas audit) and RATA (relative accuracy test audit) and data availability requirements are satisfied for this monitoring method.

186.g. Continous Parameter Monitoring System Formula to calculate NOx lb/mmbtu from natural gas firing rate:

If Natural Gas Flow <=380MSCF/Hr,

then NOx lb/mmbtu = 0.000383*MSCF/Hr + 0.1047,

otherwise if the Natural Gas flow (or anytime six (6) burners are utilized) >380MSCF/Hr

then NOx lb/mmbtu = 0.0003757 * MSCF/Hr + 0.2987

187. The permittee shall conduct emission factor verification tests in accordance with ODEQ's *Source Sampling Manual* and the source test plan approved by LRAPA for the PM, CO, NO_x, SO_2, and VOC emission

factors listed for emissions units using the test methods and minimum test frequencies listed above in Condition 186.a. The results of the emission factor verification tests may be used to correct baseline or PSELs if more accurate data is obtained. [LRAPA Title 12 "Baseline Emission Rate"] Some of the testing included in Condition 186 Table 32, under test methods or frequency is provided to allow the use of compliance monitoring required elsewhere in the conditions of this permit to satisfy the PSEL verification testing monitoring requirements. Those conditions are identified in the table. Where Table 27 in Condition 186.a summarizes monitoring requirements from elsewhere in this permit, that summary is not intended to add duplicate testing. [OAR 340-218-0050(3)(a)]

187.a. When more than one (1) test is required during the permit term for PSEL emission factor verification, and less than three (3) tests/term are required, the tests shall be separated by a minimum period of six (6) months.

187.b. Any of the testing required to determine compliance with emission limits and standards (e.g,. testing required in Conditions 83, 86, 98, 101, 127, 136, 141, 146, 159, 172, 173, 187.d, and 187.f) may be used to satisfy this requirement in part or in full.

187.c. In the source test plan, the permittee may propose the following:

187.c.i. To group similar emissions units together and source test only one (1) emissions device of the group of similar emissions units for emission factor verification testing. If the permittee determines that the emissions devices are not similar, source testing shall be done on all the emissions devices.

187.c.ii. To conduct the source test at only one (1) monitoring point for an emissions unit if all monitoring points are expected to have similar emissions. If more than one (1) source test is required during the permit term, the subsequent test shall be done on a different monitoring point, if applicable.

187.c.iii. To conduct a source test using an alternative method than specified in Condition 186.a. Use of alternative methods, other than those specified in Condition 186.a, are subject to approval by LRAPA.

187.c.iv. If the first emission factor verification test during this permit term indicates that the actual emission rate from a source or group of sources (subject to twice per term emission factor verification tests) is less than 50% of the emission factor listed in Condition 186.a, the permittee need not perform the second emission factor verification test. If more than one (1) source test is required during the permit term, the subsequent test shall be done on a different emissions device in the group of similar emissions devices.

187.d. For EU-150A or EU-150B (except for Condition 187.d.iv SO_2 monitoring), the following procedures and test methods shall be used once per permit term to verify emission factors for emissions unit EU-150A at monitoring point PR150-008 and for emissions unit EU-150B at monitoring point EQ150-301, except that no further testing shall be required on EU-150A or EU-150B for PM:

187.d.i. DEQ Method 5 shall be used to measure particulate matter emissions while burning oil.

187.d.ii. EPA Method 10 shall be used to measure carbon monoxide emissions while burning oil.

187.d.iii. EPA Method 7E or equivalent, or the NOx CEMs shall be used to measure nitrogen oxide emissions while burning oil.

187.d.iv. To measure sulfur dioxide emissions while burning oil, the permittee shall perform one (1) of the following on an annual basis regardless of the quantity of fuel oil used:

187.d.iv.A. Source test using EPA Method 6 or 6C, or

187.d.iv.B. Material balance using the equation and sulfur content in Condition 186.c to calculate the SO_2 emissions.

187.d.v. During each source test, the permittee shall record fuel type and usage, opacity, and steam production.

187.e. The permittee shall notify LRAPA at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with ODEQ's *Source Sampling Manual*. The permittee is not required to submit a source test plan if a plan has already been approved for the emissions unit and the pollutant to be tested.

187.f. Source test reports prepared in accordance with the ODEQ's *Source Sampling Manual* must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.The summary shall include the following information:

187.f.i. Emissions unit and monitoring point identification;

187.f.ii. Emission factors in the same units as in the table above;

187.f.iii. Emission results in pounds per hour;

187.f.iv. Process parameters during the test (e.g., material throughput, types and amounts of fuels, heat input, etc.); and

187.f.v. Control device operating parameters if any.

188. The emissions factors listed in Condition 186.a are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 186.b through 186.f of this permit using the measured process parameters recorded during the reporting period and the emission factors contained in Condition 186.a and the calculations in Conditions 186.b through 186.f. [OAR 340-218-0040(4)]

189. For compliance with annual PSELs, the permittee shall maintain a system that tracks all emissions unit PSEL calculations that comprise the facility-wide rolling 12-month and discrete calendar yearly PSELs. The system shall perform the calculations as required in Condition 186.band perform the summation on a monthly basis, from daily estimates of actual emissions. The system and PSEL data shall be available for inspection by LRAPA personnel, and the calculations shall be documented in the permittee's *QA Manual* as required in Condition 22. The system may consist of computer tracking or by any other means documented in the permittee's *QA Manual*. Alternately the permittee may demonstrate compliance with the PSEL limitations in Condition 185 by recordkeeping on process throughputs, and demonstrating that the throughputs do not exceed the calculation basis of the PSEL limits. Emission units that do not operate for the respective time period shall not be included in the estimation of the PSEL calculations. [OAR 340-218-0050(3)]

~~COMPLIANCE SCHEDULE [OAR 340-218-0080(4)]~~

~~190. No compliance order is in effect at this time.~~

~~MONITORING REQUIREMENTS [OAR 340-218-0050(3)(a)]~~

~~The monitoring requirements are grouped into sections immediately following each emission unit section, including a group of facility-wide monitoring requirements that follow the facility-wide section.~~

RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(b)]

~~191. The permittee shall maintain the following general records of monitoring required by this permit as appropriate: [OAR 340-218-0050(3)(b)(A)]~~

~~191.a. Date, place as defined in the permit, and time of sampling or measurements;~~

~~191.b. Date(s) analyses were performed;~~

~~191.c. Company or entity that performed the analyses;~~

~~191.d. Analytical techniques or methods used;~~

~~191.e. Results of such analyses;~~

~~191.f. Operating conditions as existing at the time of sampling or measurement; and~~

~~191.g. Records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibrations drift checks).~~

192. The permittee shall maintain the following specific records of required monitoring information: [OAR 340-218-0050(3)(b)(A)]

192.a. Results for any Method 9 visible emissions monitoring;

192.b. Fuel sulfur analysis results for #1, #2, ASTM Grade No. 4 and/or No. 6 oil and used oil;

192.c. Records of air pollution episodes and emission reduction actions taken;

192.d. Records required by 40 CFR 63, Subpart S;

192.e. Log of air quality related complaints received from the public by the permittee and investigation reports for those complaints;

192.f. Daily average arithmetic average TRS concentrations from EU-445A, and daily cumulative hours with concentrations greater than 10 ppm;

192.g. Daily average arithmetic average TRS concentrations from EU-445C, and daily cumulative hours with concentrations greater than 5 ppm;

192.h. Hourly arithmetic average oxygen concentrations from CEMS for EU-445A and EU-445C;

192.i. Correlation equation and correlation coefficient for the relationship between stack flow and steam flow or stack flow and fuels firing rate for emissions unit EU-445A and EU-445C;

192.j. Average daily equivalent and annual pulp production (ADMT or ADT) through EU-445A and EU-445C;

192.k. Mass of dry black liquor solids burned per day in EU-445A and EU-445C;

192.l. Daily TRS emissions in units of kg/ADMT(or lb/ADT) from EU-445A and EU-445C;

192.m. Source test results for PM emissions in units of lb/day and kg/ADMT (or lb/ADT) from EU-445A and EU-445C;

192.n. Visible emissions from emissions unit EU-445A and EU-445C as collected by the COMS including the average daily opacities, number of 6-minute averages in excess of 35%, the average opacity above 35%, and corrective action taken to address opacity exceedances;

192.o. Once per month 3-hour discrete average sulfur dioxide concentrations from EU-445A and EU-445C;

192.p. Daily records of the amounts and types of each fuel combusted during each day in EU-445A and EU-445C;

192.q. Daily arithmetic average TRS concentrations from EU-455 and daily cumulative hours with concentrations greater than 20 ppm;

192.r. Hourly arithmetic average oxygen concentrations from CEMS for EU-455;

192.s. Correlation between stack flow, type, and amount of fuels used and other contributing parameters to stack flow for emissions unit EU-455;

192.t. Average daily equivalent, monthly lime mud production or fuel usage, and air-dried pulp production to calculate average daily equivalent ADMT (or ADT) pulp production for EU-455;

192.u. Average daily equivalent and annual pulp production (ADMT or ADT) through EU-455;

192.v. Daily TRS and PM emissions in units of kg/ADMT (or lb/ADT) from EU-455;

192.w. PM emissions from EU-455 in kg/ADMT (or lb/ADT) and gr/dscf as measured through source testing;

192.x. Daily records of down time of EU-455 (or EU445A or EU445C) and corrective/preventative action taken when this downtime causes NCG system venting over one (1) hour;

192.y. Daily records of all periods of interruption of NCG thermal oxidation;

192.z. Cumulative minutes that non-condensible gases are vented to the atmosphere;

192.aa. Preventive measures or corrective action taken as a result of switching to a thermal oxidation unit when switching causes NCG venting for more than one (1) hour per changeover;

192.bb. Daily records of the amounts of each fuel combusted during each day in EU455;

192.cc. Any records of visible emission monitoring for EU455;

192.dd. Occurrence of deviations from the opacity action level for the lime kiln ESP, CD 456-110, and any corrective actions taken;

192.ee. TRS and PM emission results for EU-445B and EU-445D in kg/ADMT(lb/ADT);

192.ff. Source test average scrubber operating parameters for each smelt dissolving tank scrubber, CD445-164 (#3 East DTV), CD445-162 (#3 West DTV) and CD445-164 (#4 DTV), the number of deviations from the scrubber action levels, and any corrective actions taken;

192.gg. Source test results for TRS emissions for the miscellaneous/other TRS sources, EU-275C and EU-275D in kg/ADMT;

192.hh. Results of any visible emission monitoring for EU-275C and EU-275D #1 and #3 Slakers while they continue to operate;

192.ii. Inspection and maintenance records on #1 and #3 Slaker Scrubbers while they continue to operate;

192.jj. Daily and annual records of fuel usage for emissions units EU-150A and EU-150B, and the percent of heat input provided by oil per calendar year;

192.kk. Any visible emissions observations for the power boiler, EU-150A;

192.ll. Visible emission data from EU-150B when oil is used as the fuel;

192.mm. Hourly average NO_x emission rates expressed in ng/J (lb/million Btu) heat input for EU-150B;

192.nn. Operating status records on the flue gas recirculation system for EU-150B;

192.oo. Results of visible emissions monitoring for Condition 17, and any corrective actions taken;

192.pp. Daily and annual records of fuel usage for EU-402, EU-445A, and EU-445C;

192.qq. Results of inspections, average hourly scrubber operating parameters, for the EU-402, device PS402-401 Wet Scrubbers, deviations from the action levels, and any corrective action taken when operating;

192.rr. Results of inspections and corrective actions taken for EU-402 Wet Scrubber, EU-456 #1 and #3 Slaker Wet Scrubbers until removed;

192.ss. Daily and annual records of pulp production through EU-410 and EU-420 (digesters);

192.tt. Daily and annual records of alternative fiber production through EU-402;

192.uu. Daily and annual records of days of operation for EU-410 and EU-420;

192.vv. Daily and annual records of chips handled through EU-310 based on digester pulp throughput;

192.ww. Daily and annual records of chips handled and stored through EU-320 based on digester pulp throughput;

192.xx. Daily and annual records of paper production for EU-714A, EU-714B, EU-715A and EU-715B;

192.yy. Daily and annual records of days of operation for EU-600, EU-714A and EU-715A;

192.zz. Daily and annual records of OCC production for EU-600;

192.aaa. Occurrence and length of downtime for all pollution control devices if any process associated with the control device continues to operate while the control device is not operating.

192.bbb. Daily records and calculations required by Condition 207.

~~193. Unless otherwise specified by permit condition, the permittee shall make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage, or weather conditions do not allow visible emissions monitoring for three (3) successive attempts), the missing record(s) shall not be considered a permit deviation provided the amount of data does not exceed 10% of the averaging or testing periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee shall document the reason for the missing record. In addition, any missing record that can be recovered from other available information shall not be considered a missing record. [LRAPA 34-015, 35-0160, and OAR 340-218-0050(3)(b)]~~

~~194. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit shall be retained for five (5) years. [OAR 340-218-0050(3)(b)(B)]~~

REPORTING REQUIREMENTS

[OAR 340-218-0050(3)(c)]

~~195. Excess Emissions Reporting The permittee must report all excess emissions as follows: [LRAPA 36-001 through 36-030]~~

~~195.a. Immediately (within 1 hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and~~

~~195.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025-1]~~

~~195.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;~~

~~195.b.ii. The date and time the owner or operator notified LRAPA of the event;~~

~~195.b.iii. The equipment involved;~~

~~195.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;~~

195.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;

195.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);

195.b.vii. The final resolution of the cause of the excess emissions; and

195.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to 36-040.

195.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.

195.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.

195.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.

195.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025-3. However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]

196. Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 195. [OAR 340-218-0050(3)(c)]

197. The permittee shall report the following information within 30 days of the end of each calendar month to the LRAPA office: [LRAPA 33-070-7. LRAPA-only enforceable]

197.a. Daily average emissions of TRS gases expressed in parts per million of H_2S on a dry gas basis with oxygen concentrations, if oxygen corrections are required, from emissions units EU-445A, EU-445C and EU-455;

197.b. Daily average emissions of TRS gases in pounds of total reduced sulfur per equivalent ton of pulp processed (kg/ADMT or lb/adt), expressed as H_2S from emissions units EU-445A, EU-445C and EU-455;

197.c. Maximum daily 3-hour average emissions of SO_2 based on all samples collected during one (1) sampling period from the recovery furnaces, EU-445A and EU-445C, expressed as ppm, dry basis;

197.d. Number of 6-minute average opacities from the recovery furnace combined stack that exceed 35% opacity, and all daily average opacities from the recovery furnace combined stack;

197.e. Daily average pounds of particulate matter per equivalent ton of pulp produced for each recovery furnace EU-445A and EU-445C based on source test results;

~~197.f. Results of the last two (2) recovery furnace particulate matter source tests (grains per dry standard cubic foot), the stack flow rate (dscfm), and for the same source test period, the hourly average opacity;~~

~~197.g. The permittee shall include the discrete 24-hour averages in the monthly report as required by Condition 209, and~~

~~197.h. All periods of non-condensible gas bypass.~~

~~197.i. Daily calculations required by Condition 207.~~

198. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the LRAPA office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]

198.a. The first semi-annual report is due on August 15 and must include the semi-annual compliance certification, OAR 340-218-0080.

198.b. The annual report is due on March 15 and shall include the items required by Condition 202:

~~199. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]~~

~~199.a.i. The identification of each term or condition of the permit that is the basis of the certification;~~

~~199.a.ii. 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, and whether such methods or other means provide continuous or intermittent data. Such methods and other means include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;;~~

~~199.a.iii. The status of compliance with permit terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 179aii. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA 36-005 occurred;~~

~~199.a.iv. Such other facts as LRAPA may require to determine the compliance status of the source.~~

~~199.a.v.~~

~~200. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated in to the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(c)]~~

Pages 130-139 redacted -- outside the scope of the SIP.