OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 725-AOP-R2

IS ISSUED TO:

International Paper Company
1944 Adams Avenue
Camden, AR 71701
Ouachita County
CSN:52-0013

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

June 1, 1999 and May 31, 2004

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

PERMITTEE:	International Paper Company
CSN:	52-0013
PERMIT NUMBER:	725-AOP-R2
FACILITY MAILING ADDRESS:	1944 Adams Avenue Camden, AR 71701
PHYSICAL LOCATION:	1944 Adams Avenue Camden, AR 71701
COUNTY:	Ouachita
CONTACT POSITION:	Russell Delezen / Jay Wilson
TELEPHONE NUMBER:	870-231-2251 / 870-231-2250
REVIEWING ENGINEER:	Loretta Reiber
UTM North-South (X):	3711.5
UTM East-West (Y):	516.5

SECTION II: INTRODUCTION

International Paper Company owns and operates a facility in Camden which produces a variety of unbleached papers and linerboard. The primary Standard Industrial Classification Code (SIC) for this facility is 2611 and 2621. This permit will continue to classify this facility as a major source of criteria pollutant emissions (with the exception of lead) with respect to Title V and 40 CFR 52.21.

Wood is accepted in either chip or log form. Other chips are stored in piles. Logs are debarked, chipped, and screened prior to storage in the chip silos. Chips are conveyed to the pulp mill, cooked in a continuous digester, washed, stored, and transferred to the paper mill where they are refined. Recycled fiber is also produced from a post consumer recycle plant. Recycled fiber, virgin fiber, chemicals, and dyes form the feedstock for the three paper machines. The final paper product is trimmed, wound onto rolls, and prepared for shipment off site.

Weak black liquor from the pulp mill is concentrated in an evaporation system prior to combustion in one of the three recovery boilers. These boilers recover the spent cooking chemicals as green liquor. Energy from liquor combustion is captured to generate steam for mill use.

The green liquor is reacted with lime in the caustic and lime recovery area and clarified to produce white liquor. The lime mud from the clarifier is recovered, calcined in a lime kiln, and reused. Ancillary systems include the bark boiler and the two power boilers which provide supplemental plant-wide steam, two steam turbines, a gas turbine generator equipped with a heat recovery steam generator (HRSG), a wastewater treatment system, an electrical distribution system, maintenance areas, and laboratories.

Permit #725-AOP-R2 is the third operating permit issued to International Paper Company under Regulation 26. This modified permit is being issued to allow for the installation of a roundwood slasher at the woodyard. Permitted emissions will be increasing by 0.1 tons per year. In addition, an averaging time will no longer be specified in this permit for demonstrating compliance with the HAP emissions from the pulping process condensates. Instead, the permittee will now be required to demonstrate an appropriate averaging period as required under the Cluster Rule and the extension to the effective date of the Cluster Rule which has been previously granted.

All of the hourly emission rates for this facility were based upon the maximum capacity of the equipment. CEMs as required by §19.804 of Regulation 19 will show compliance with the permitted emission rates for total reduced sulfur from several pieces of equipment. There are no additional requirements for demonstrating compliance with the short term emission rates in this permit. Compliance with the annual emission rates will be demonstrated through several record keeping requirements. These specific conditions are specified for each set of emission rates in this permit. All of the records are to be kept on a twelve month rolling total so that compliance may be demonstrated for any twelve month period. Records and limits which are based on the requirements of 40 CFR Part 63, Subpart S may have a different averaging time for demonstrating compliance.

REGULATIONS

International Paper Company - Camden Mill is subject to the applicable provisions of the following regulations.

Regulation	Description
18	Arkansas Air Pollution Control Code
19	Regulations of the Arkansas Plan of Implementation for Air Pollution Control
26	Regulations of the Arkansas Operating Air Permit Program
40 CFR 52.21	Prevention of Significant Deterioration
40 CFR Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
40 CFR Part 60, Subpart GG	Standards of Performance for Stationary Gas Turbines
40 CFR Part 63, Subpart S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

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Following are a table of the facility wide emissions of federally regulated pollutants and a table of the facility wide non-criteria pollutant emissions. Specific unit information may be located using the indicated cross reference pages in the first table. The annual emission totals for sources SN-01, SN-04/05, and SN-06 include emissions generated by the firing of #6 fuel oil. The permitted annual emission rates for these sources while firing #6 fuel oil may be found in the plantwide conditions as the amount of #6 fuel which the permittee is allowed to fire at each of these sources has been combined.

EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
Total Allowable Emissions		PM	547.8	2070.2	N/A
		PM_{10}	285.1	1076.3	
		SO_2	4132.1	2481.7	
		VOC	1063.3	4417.8	
		CO	1834.4	7011.3	
		NO_x	1035.2	2406.2	
		Pb	1.21	4.60	
		TRS	170.2	650.5	
01	Bark Boiler	PM	76.7	329.2	98
		PM_{10}	62.5	274.3	
		SO_2	706.5	22.3	
		VOC	28.0	122.7	
		CO	619.0	2711.1	
		NO_x	110.0	482.8	
		Pb	0.05	0.01	

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
02	Slaker Vent Scrubber	PM	5.0	21.9	82
		PM_{10}	5.0	21.9	
		VOC	3.3	14.2	
		TRS	0.1	0.2	
03	Lime Kiln	PM	70.0	306.6	75
		PM_{10}	34.9	152.9	
		SO_2	17.4	76.3	
		VOC	5.1	22.3	
		CO	35.0	153.3	
		NO_x	44.8	196.0	
		Pb	1.10	4.50	
		TRS	7.4	19.1	
04/05	Recovery Boiler #1	PM	200.0	876.3	49
		PM_{10}	77.6	340.2	
		SO_2	1318.8	1160.6	
		VOC	66.60	294.0	
		CO	412.6	1810.0	
		NO_x	192.0	401.9	
		Pb	0.02	0.04	
		TRS	31.8	140.6	

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
06	Recovery Boiler #2 and #3	PM	75.0	307.0	56
		PM_{10}	29.1	58.2	
		SO_2	1507.2	1066.1	
		VOC	162.3	711.4	
		CO	454.0	1991.6	
		NO_x	242.0	701.9	
		Pb	0.01	0.02	
		TRS	37.2	163.9	
07	Smelt Dissolving Tank #1	PM	25.0	110.0	63
		PM_{10}	25.0	110.0	
		SO_2	7.5	32.9	
		VOC	28.0	122.3	
		NO_x	12.9	56.7	
		Pb	0.01	0.01	
		TRS	1.5	6.6	
08	Smelt Dissolving Tank #2	PM	8.4	76.3*	67
		PM_{10}	8.4	76.3*	
		SO_2	3.6	29.5*	
		VOC	13.6	115.5*	
		NO_x	6.1	51.0*	
		Pb	0.01	0.02*	
		TRS	0.7	5.8*	

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
09	Smelt Dissolving Tank #3	PM	9.0	76.3*	67
		PM_{10}	9.0	76.3*	
		SO_2	3.2	29.5*	
		VOC	12.2	115.5*	
		NO_x	5.5	51.0*	
		Pb	0.01	0.02*	
		TRS	0.6	5.8*	
10	Auxiliary Power Boiler #1	This source is no longer in service.			
11	Auxiliary Power Boiler #2	This source is no longer in service.			
12	NCG Incinerator	PM	0.2	0.9	86
		PM_{10}	0.2	0.9	
		SO_2	10.9	15.2	
		VOC	4.0	17.3	
		CO	9.4	41.1	
		NO_x	7.3	32.1	
		TRS	1.8	4.3	

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
13	Cogeneration Unit	PM	5.6	24.6	94
		PM_{10}	5.6	24.6	
		SO_2	0.4	1.5	
		VOC	2.8	12.1	
		CO	51.6	226.2	
		NO_x	93.3	408.8	
14	NCG Back-Up Flare	PM	0.2	0.2	86
		PM_{10}	0.2	0.2	
		SO_2	544.8	74.3	
		VOC	3.0	3.1	
		CO	9.4	5.7	
		NO_x	7.3	4.4	
		TRS	7.6	2.3	
15	Brown Stock Washers	VOC	221.1	968.4	32
		TRS	45.7	200.3	
16	Aeration Stabilization Basin and Process Sewers	VOC	9.1	39.9	116
		TRS	1.2	4.1	
17	The printing presses are no longer in service.				
18	Black Liquor Oxidation Tank Vent	VOC	121.5	531.1	47
		TRS	25.0	62.2	

EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
19	Woodyard Source Group	PM	0.7	3.1	22
		PM_{10}	0.6	2.7	
		VOC	36.9	161.5	
20	Digester and Blow Tanks Source Group	PM	0.1	0.1	25
		PM_{10}	0.1	0.1	
		VOC	1.7	6.8	
		TRS	0.9	3.8	
21	Turpentine Recovery Source Group	VOC	0.2	0.9	28
22	Knotter System Source Group	VOC	18.7	81.3	30
		TRS	1.7	7.5	
23	High Density Storage Source Group	VOC	47.9	209.6	35
		TRS	2.9	12.8	
24	Pine Stock Chest	VOC	47.9	209.6	37
		TRS	2.9	12.8	
25	Weak Black Liquor Storage Source Group	VOC	6.3	26.5	40
		TRS	0.6	2.5	
26	Strong Black Liquor Storage Source Group	VOC	0.3	0.7	44
		TRS	0.2	0.6	
27	Multiple Effect Evaporators	Emissions from this source are routed to sources SN-12 and/or SN-14.			42

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
28, 29, 30, 32, 33, & 34	Causticizing Area Sources	VOC	7.4	31.2	72
		TRS	0.3	0.8	
31	Lime Handling Source Group	PM	1.0	4.4	80
		PM_{10}	1.0	4.4	
35	Paper Mill Source Group	VOC	161.6	707.6	112
36	Active East Landfill	VOC	0.8	3.3	123
		CO	0.1	0.3	
		TRS	0.1	0.3	
37	Gasoline Storage Tank	VOC	22.8	0.5	127
38	Maintenance Parts Cleaners	This is an insignificant activity under Group B.			
39 - 46	These sources were all part of the bag plant which has been removed from service.				
47	Package Boiler	PM	5.5	6.6	104
		PM_{10}	5.5	6.6	
		SO_2	0.2	0.2	
		VOC	0.4	0.4	
		CO	50.0	60.0	
		NO_x	25.0	30.0	

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EMISSION SUMMARY FOR CRITERIA POLLUTANTS					
Source No.	Description	Pollutant	Emission Rates		Cross Reference Page
			lb/hr	tpy	
48	Air Compressors	PM	2.0	2.5	129
		PM_{10}	2.0	2.5	
		SO_2	1.8	2.3	
		VOC	2.3	2.9	
		CO	5.9	7.4	
		NO_x	27.2	34.3	
49	Shutdown Equipment	PM	18.4	0.5	132
		PM_{10}	18.4	0.5	
		SO_2	17.2	0.5	
		VOC	27.5	0.7	
		CO	187.4	4.6	
		NO_x	261.8	6.3	

*These are the combined totals for sources SN-08 and SN-09 and not individual limits for each source.

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EMISSION SUMMARY FOR NON-CRITERIA POLLUTANTS		
Pollutant	lb/hr	tpy
Acetaldehyde	13.57	58.95
Acetone**	4.35	12.22
Acetophenone	0.03	0.11
Acrolein	0.39	1.40
Acrylonitrile	0.01	0.02
Aldehydes	0.06	0.01
Ammonia**	167.67	734.31
Antimony Compounds	0.200	0.115
Arsenic Compounds	0.070	0.146
Benzene	0.50	1.29
Beryllium Compounds	0.010	0.007
Cadmium Compounds	0.04	0.123
Carbon Disulfide	0.76	3.20
Carbon Tetrachloride	0.03	0.08
Carbonyl Sulfide	0.02	0.05
Chlorobenzene	0.09	0.27
Chloroform	0.10	0.31
Chromium Compounds	0.85	3.60
Cobalt Compounds	0.160	0.154
Cresols & Hexachloroethane	0.06	0.27
Cumene	0.05	0.15
Dibenzofurans	0.01	0.01
Dimethyl Disulfide*	5.95	25.87

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EMISSION SUMMARY FOR NON-CRITERIA POLLUTANTS		
Pollutant	lb/hr	tpy
Dimethyl Sulfide*	50.81	222.65
Ethyl Benzene	0.01	0.02
Ethylene Glycol	0.44	1.92
Formaldehyde	3.89	12.72
Hydrogen Chloride**	32.52	105.92
Hydrogen Fluoride**	0.46	0.15
H_2S	13.6	58.0
Lead Compounds	0.09	0.269
Manganese Compounds	2.41	10.132
Mercury Compounds	0.01	0.015
Methanol	396.42	1732.79
Methyl Ethyl Ketone	4.40	18.66
Methyl Isobutyl Ketone	0.38	1.25
Methylene Chloride**	0.51	2.21
Methyl Mercaptan*	12.79	55.78
n-Hexane	0.22	0.80
Napthalene	0.21	0.89
Nickel Compounds	1.000	0.785
Phenols	3.32	14.49
POM & PAH	0.11	0.36
Propionaldehyde	0.11	0.45
Selenium Compounds	0.020	0.021
Styrene	0.69	2.39

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EMISSION SUMMARY FOR NON-CRITERIA POLLUTANTS		
Pollutant	lb/hr	tpy
1,1,2,2-Tetrachloroethane	0.01	0.01
Tetrachloroethylene**	0.41	1.72
Toluene	0.36	1.01
1,2,4-Trichlorobenzene	0.80	3.31
1,1,1-Trichloroethane**	0.13	0.44
1,1,2-Trichloroethane	0.12	0.49
Trichloroethylene	0.07	0.19
Vinyl Chloride	0.01	0.02
Xylene	0.32	0.76
Zinc	25.67	112.49

*Components of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

SECTION III: PERMIT HISTORY

Operations at the facility now known as International Paper Company - Camden Mill began in early 1928. With the exception of the frames of the paper machines, all of the original equipment has been replaced.

Permit #725-A was issued to International Paper Company on March 23, 1984. This permit allowed for the rebuilding of the electrostatic precipitator controlling emissions from the #2 and #3 recovery boilers.

Permit #990-A was issued to International Paper Company on January 10, 1990. This permit allowed for the installation of the cogeneration unit at this facility. At this time, the facility took severe restrictions on the two auxiliary power boilers to net out of a PSD review.

Permit #1239-A was issued to International Paper Company on December 13, 1991. This permit allowed for the installation of a new multiple effect evaporator. Limits were taken on the amount of black liquor solids that could be burned in the recovery boilers in order to avoid a PSD review.

Permit #725-AR-1 was issued to International Paper Company on May 15, 1992. This permit consolidated permits #725-A, #990-A, and 1239-A. Annual emissions were quantified for the first time in this permit.

Permit #1458-A was issued to International Paper Company on June 2, 1993. At this time, the Department and International Paper were working on a PSD permit for the cogeneration facility. The facility wished to install a scrubber on source SN-01, the bark boiler, prior to the issuance of the draft permit. Therefore, the Department issued this temporary permit to allow for the installation of the scrubber.

Permit #725-AR-2 was issued to International Paper Company on November 1, 1996. This permit consolidated permits #725-AR-1 and #1458-A. Restrictions on the operation of the auxiliary power boilers (which have since been taken out of service) were changed which resulted in the need for a retroactive PSD review of the emissions from the cogeneration unit. Although the increase in particulate matter emissions from the cogeneration unit were above the PSD significant increase level, the permittee was able to net out of PSD review for particulate matter. Emissions of sulfur dioxide and volatile organic compounds were below significant increase levels without any corresponding offsets. A PSD review for the emissions of oxides of nitrogen and carbon monoxide from the cogeneration unit was conducted due to net emissions increases of 241.79 tpy of carbon monoxide and 240.01 tpy of oxides of nitrogen. As such, a Best Available Control Technology (BACT) analysis for oxides of nitrogen and carbon monoxide is required.

BACT is defined as an emission limitation based on the maximum degree of reduction of each pollutant subject to regulation which the environmental authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts, determined is achievable. The BACT assessment identifies alternative control methods, considers the technical feasibility of each method, ranks the technically feasible alternatives in terms of control effectiveness, evaluates the economic, energy, and environmental aspects of technically feasible alternatives, and identifies the control method considered BACT for each pollutant and source combination.

NO_X Control Technologies

NO_X formation is a function of three main variables: fuel bound nitrogen in the fuel burned in the combustion chamber, combustion chamber flame temperature, and combustion chamber residence time. Conceptually, several types of NO_X control technologies exist to control the formation of NO_X at its source of formation. This can involve limiting the fuel bound nitrogen, lowering the flame temperature of the combustion chamber through wet injection, chamber design, and/or fuel to air ratios (combustion control), and decreasing the residence time of the fuel in the combustion chamber, usually through the design of the combustion device.

The other type of control technology involves reducing the NO_X content of the combustion exhaust gases (post-combustion control). This can involve selective catalytic reduction, nonselective catalytic reduction, and selective noncatalytic reduction. These control technologies can also be used in combination with the technologies that control NO_X at its source formation.

The permittee's cogeneration unit currently controls the amount of NO_X formed from fuel bound nitrogen by limit the fuel for this unit to only natural gas. The flame temperature of the gas turbine combustion chamber is lowered by steam injection, thereby reducing the amount of NO_X formed. Water injection is not used in the cogeneration unit. Also, the flame temperature of the downstream duct burner is controlled through the use of low NO_X burners. The control options of wet injection for NO_X reduction in the gas turbine, and the combustion control technologies built into the designs of the gas turbine and duct burner, represent the best control technology for this unit. Since these controls already exist for the cogeneration unit, no additional controls are proposed.

CO Control Technologies

Carbon monoxide emissions in gas turbines arise from inefficient or incomplete combustion of fuel. Three major factors which influence carbon monoxide formation in gas turbines are firing temperature, combustion chamber residence time, and combustion mixing characteristics. By increasing the combustion chamber temperature and residence time, the rate of CO conversion to CO_2 increases, thereby reducing CO emissions. However, increasing the combustion chamber temperature and residence time, NO_X emissions increase. Therefore, a dichotomy exists between

CO and NO_X at their source of formation. By reducing the rate of formation of one, the rate of formation of the other increases. Since NO_X is of greater concern from the point of ambient air quality and ozone formation, it is not considered environmentally acceptable to lower the CO emissions at the expense of additional NO_X emissions.

The control of CO emissions from the cogeneration unit involves oxidizing the CO to CO_2. The options currently available to reduce the CO emissions are thermal oxidation and catalytic oxidation. International Paper considers the duct burner to act as a thermal oxidizer to control or minimize CO emissions. The temperature of the exhaust gas is raised to 1560EF, which is near the range of thermal oxidation of CO and CO_2. No additional CO controls are proposed.

Ambient Air Quality Analysis

As required by the PSD Regulations, the increases in emissions were modeled to determine their impact. The results of this modeling may be found in the following table. As the ambient impacts caused by the increases in emissions were below the Modeling Significance Levels, the full impact analysis, which includes NAAQS modeling and an increment analysis, nor any ambient monitoring was required.

Pollutant	Averaging Period	Impact	Modeling Significance Level
CO	1-hour	37.20	2000
	8-hour	11.69	500
NO_X	Annual	0.54	1.0

Additional impact analyses indicated that there will be no construction and growth impacts associated with the scope of the proposed modification. Nor are any adverse impacts on soil or vegetation anticipated due to the cogeneration unit. It is unlikely that there would be any measurable impact on the nearest Class I area which is well over 250 km from this facility.

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Permit #725-AOP-R0 was issued to International Paper Company - Camden Mill on June 1, 1999. Several sources were deleted in this permit due to the removal of the bag plant. Several sources which have been in operation at this facility for some time were permitted for the first time. Two new sources were also added. The two new sources were a package boiler which will be brought on site whenever another boiler will be down for an extended period of time and a baghouse to control the particulate matter emissions from the lime handling operations. In addition to several additional sources being permitted, non-criteria pollutants were also quantified. Permitted emissions from several sources were increased. This was due to a change in the method of calculation and not a change in the method of operation.

Permit #725-AOP-R1 was the second operating permit issued to International Paper Company under Regulation 26 and was issued on April 4, 2000. Under this permit, several changes were made in order to comply with the applicable requirements of 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*. These changes included, but were not limited to, collecting Low Volume High Concentration (LVHC) gases from various sources and feeding them to the LVHC system for destruction in either the incinerator or the lime kiln. The permittee will be collecting the pulping condensate from several sources in a hard piping system for routing to treatment in the Aeration Stabilization Basin. The permittee also replaced the scrubber located at the NCG Incinerator. Increases in permitted and/or actual emissions were not above the PSD Significant Increase Levels. The permittee also combined the #6 fuel oil usage limits for sources SN-01, SN-04/05, and SN-06 for flexibility purposes. The permitted emission rate for the lime handling system was increased to allow for a safety factor. A custom schedule for monitoring the sulfur content of the fuel used at the cogeneration unit was granted in this permit.

SECTION IV: EMISSION UNIT INFORMATION

WOODYARD

SN-19
Woodyard Source Group

Source Description

The woodyard source group includes emissions from roundwood chipping and screening, purchased chips unloading and storage, chip silo loading, debarking drums, roundwood chips rechipping, sawdust storage, purchased chips rechipping, chip conveying, and other associated equipment. Under this permit, a roundwood slasher will be added to the woodyard source group.

Due to the nature of the emissions from this source, an opacity limit would not be practical because of the difficulty in determining compliance with it. Instead, Plantwide Conditions 20 and 21 will require that the facility be operated in a manner that will not cause unnecessary visible emissions.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-19. Compliance with these emission rates will be shown through compliance with the limit of wood chips that may be processed at this source.

Pollutant	lb/hr	tpy
PM_{10}	0.6	2.7
VOC	36.9	161.5

2. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-19. Compliance with these emission rates will be shown through compliance with the limit of wood chips that may be processed at this source.

Pollutant	lb/hr	tpy
PM	0.7	3.1

3. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not process more than 4.1 million tons of chips at source SN-19 in any consecutive twelve month period.

4. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of chips processed at source SN-19 in order to demonstrate compliance with Specific Condition 3 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

PULP MILL

SN-20
Digester and Blow Tank Source Group

Source Description

Source SN-20, which was installed or last modified in 1963, covers the emissions from the digester, vented either from the loading of chips or from the blow tanks following the digester. The digester is used to pressure cook the wood chips. The blow tanks are used to blow the pulp from the digester to atmospheric pressure. The particulate matter emissions result from loading the chips into the different digester. No control equipment for particulate matter emissions is associated with SN-20.

The emissions which occur at the digesters while the chips are being cooked are routed to the turpentine recovery source group (SN-21). The emissions from source SN-21 are then routed to the NCG Incinerator (SN-12) as required by §19.804 of Regulation 19. Under this permit, the emissions from the blow tank, two low pressure feeders, and after blow tank condenser will also be collected and routed to either SN-12 or the lime kiln (SN-03). The facility may route these emissions to the back-up flare (SN-14) for a limited amount of time as provided in Specific Condition 114.

No opacity limit has been assigned for this source group. The particulate matter emissions are intermittent and occur when loading chips into the digester chipper hoppers. Instead Plantwide Conditions 20 and 21 will require that this source group be operated in a manner that will not cause unnecessary visible emissions.

Source SN-20 is subject to the applicable provisions of 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*.

Specific Conditions

5. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-20. Compliance with these emission rates will be determined through compliance with the limit of air dried tons of pulp (ADTP) that may be processed at this facility and proper incineration of the gases which result from cooking the chips.

Pollutant	lb/hr	tpy
PM_{10}	0.1	0.1

Pollutant	lb/hr	tpy
VOC	1.7	6.8
TRS	0.9	3.8

6. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-20. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit of ADTP and proper incineration of the gases which result from cooking the chips.

Pollutant	lb/hr	tpy
PM	0.1	0.1
Acetaldehyde	0.02	0.09
Cresols & Hexachloroethane	0.06	0.27
Dimethyl Disulfide*	0.06	0.22
Dimethyl Sulfide*	0.71	3.11
H_2S*	0.1	0.4
Methanol	0.36	1.56
Methyl Ethyl Ketone	0.01	0.03

*Component of TRS.

7. Pursuant to §19.804 of Regulation 19, the exhaust gases from the digesters shall be incinerated at 1200EF for a minimum of 0.5 seconds. (Currently, the facility is routing the gases through the turpentine recovery source group prior to incineration at source SN-12 which meets this requirement.)

8. Pursuant to 40 CFR §63.443(c), §19.304 and §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the non-condensible gases from the digesters, the #1 and the #2 low pressure feeders, the blow tank, and the after blow tank condenser shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in §63.450. The lime kiln (SN-03), the NCG Incinerator (SN-12), and the NCG Back-Up Flare (SN-14) are control devices that may be used at this facility.

SN-21
Turpentine Recovery Source Group

Source Description

Source SN-21, which was installed or last modified in 1978, consists of several turpentine condensers, a decanter, a storage tank, and other associated equipment. Turpentine is recovered from the digester (see source SN-20), and flash tanks, decanted, and stored prior to being shipped off site. Emissions are routed to the NCG Incinerator (SN-12), the Back-Up Flare (SN-14), or the Lime Kiln (SN-03).

Source SN-21 is subject to the applicable provisions of 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*. Upon full implementation of the LVHC standards contained in this subpart, source SN-21 will no longer be considered an emission point at this facility.

Specific Conditions

9. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-21. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	0.2	0.9

10. Pursuant to 40 CFR §63.443(c), §19.304 and §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the non-condensible gases from the turpentine condensers, turpentine decanter, and turpentine decanter foul condensate collection tank shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in §63.450. The lime kiln (SN-03), the NCG Incinerator (SN-12), and the NCG Back-Up Flare (SN-14) are control devices that may be used at this facility.

SN-22
Knotter System Source Group

Source Description

This source, which was not previously permitted, was installed or last modified in 1982. This source group consists of the screens, the reject refiners, the reject chests, and other equipment associated with the deknotting system. The knotter system removes the knots and other undissolved material from the wood pulp before it is sent to the brown stock washers. No control equipment is associated with this source group.

Specific Conditions

11. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-22. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	18.70	81.3
TRS	1.7	7.5

12. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-22. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	0.16	0.67
Benzene	0.01	0.01
Dimethyl Disulfide*	0.19	0.83
Dimethyl Sulfide*	1.50	6.55
Formaldehyde	0.01	0.01
Methanol	17.2	75.2
Methyl Ethyl Ketone	0.05	0.21
Methyl Isobutyl Ketone	0.01	0.01
Methyl Mercaptan*	0.02	0.08
Styrene	0.01	0.01
Toluene	0.01	0.01
Xylene	0.01	0.01

*Component of TRS. Included in the TRS total.

SN-15
Brown Stock Washers Source Group

Source Description

Source SN-15, which was installed or last modified in 1968, consists of six brown stock washers (3 stages, 2 lines), their associated equipment, and the foam tank. In the brown stock washers, the pulp is washed with clean water and is separated from the digester chemicals. No control equipment is associated with this source group.

All emissions from this source are based upon NCASI factors. Previously, the VOC emissions were calculated using an emission factor from AP-42. The large increase in emissions from this source is due to the difference in the emission factors. This source was installed or last modified in 1968 and no physical modification or change in the method of operation is occurring at this source with the issuance of this permit. Therefore, this source was not required to undergo PSD review for the increase in VOC and TRS emissions.

Specific Conditions

13. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-15. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility as well as the testing requirements for this source.

Pollutant	lb/hr	tpy
VOC	221.1	968.4
TRS	45.7	200.3

14. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-15. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	0.47	2.02
Acrolein	0.01	0.05
Benzene	0.01	0.02
Carbon Disulfide	0.01	0.01
Carbon Tetrachloride	0.02	0.06
Chlorobenzene	0.01	0.01
Chloroform	0.07	0.28
Dimethyl Disulfide*	2.61	11.42
Dimethyl Sulfide*	41.8	183.00
Formaldehyde	0.17	0.75
H_2S*	0.8	3.3
Methanol	23.0	101.00
Methyl Ethyl Ketone	0.34	1.45
Methyl Isobutyl Ketone	0.02	0.09
Methylene Chloride**	0.05	0.22
Methyl Mercaptan*	0.59	2.56
n-Hexane	0.01	0.05
Styrene	0.12	0.49

Pollutant	lb/hr	tpy
Tetrachloroethylene**	0.01	0.02
Toluene	0.02	0.07
1,2,4-Trichlorobenzene	0.01	0.01
1,1,1-Trichloroethane**	0.01	0.01
1,1,2-Trichloroethane	0.01	0.03
Trichloroethylene	0.01	0.02
Xylene	0.01	0.05

*Component of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

SN-23
High Density Storage Source Group

Source Description

Source SN-23, which was installed or last modified in 1947, consists of three parallel pulp storage tanks and associated equipment. Stock which has been washed and screened to remove the knots is stored in these tanks. No control equipment is associated with the high density storage source group.

Specific Conditions

15. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-23. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	47.9	209.6
TRS	2.9	12.8

16. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-23. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	1.07	4.67
Acrolein	0.01	0.01
Benzene	0.01	0.01
Dimethyl Disulfide*	1.16	5.06
Dimethyl Sulfide*	1.60	7.01
H_2S*	0.1	0.3
Methanol	33.10	145.00
Methyl Ethyl Ketone	0.07	0.30
Methyl Isobutyl Ketone	0.01	0.03
Methyl Mercaptan*	0.09	0.36
n-Hexane	0.01	0.03
Styrene	0.01	0.05
Toluene	0.01	0.01
1,2,4-Trichlorobenzene	0.10	0.42
Xylene	0.01	0.01

*Component of TRS. Included in the TRS total.

SN-24
Pine Stock Chest

Source Description

The pine stock chest, which was installed or last modified in 1963, provides intermediate storage for pulp stock before being pumped to the paper mill. No control equipment is associated with the pine stock chest.

Specific Conditions

17. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-24. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	47.9	209.6
TRS	2.9	12.8

18. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-24. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	1.07	4.67
Acrolein	0.01	0.01
Benzene	0.01	0.01
Dimethyl Disulfide*	1.16	5.06
Dimethyl Sulfide*	1.60	7.01
H_2S*	0.1	0.3
Methanol	33.08	145.00
Methyl Ethyl Ketone	0.07	0.30
Methyl Isobutyl Ketone	0.01	0.03
Methyl Mercaptan*	0.09	0.36
n-Hexane	0.01	0.03
Styrene	0.01	0.05
Toluene	0.01	0.01
1,2,4-Trichlorobenzene	0.10	0.42
Xylene	0.01	0.01

*Component of TRS. Included in the TRS total.

BLACK LIQUOR RECOVERY AREA

SN-25
Weak Black Liquor Storage Source Groups

Source Description

Source SN-47, which was installed or last modified in 1997, consists of several weak liquor storage tanks and associated equipment that store liquor either continuously or intermittently. This source also consists of the combination tank and the blow heat recovery tank, which store both weak and strong black liquor periodically. This source stores the weak black liquor from the pulp mill prior to sending it through a multiple effect evaporator which will concentrate the liquor. No control equipment is associated with this source group.

Specific Conditions

19. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-25. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	6.3	26.5
TRS	0.6	2.5

20. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-25. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of ADTP that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	0.01	0.05
Acrolein	0.01	0.01

Pollutant	lb/hr	tpy
Benzene	0.01	0.01
Carbon Tetrachloride	0.01	0.02
Dimethyl Disulfide*	0.13	0.56
Dimethyl Sulfide*	0.44	1.91
Formaldehyde	0.01	0.02
Methanol	2.30	10.10
Methyl Ethyl Ketone	0.04	0.17
Methyl Isobutyl Ketone	0.01	0.01
Methyl Mercaptan*	0.01	0.03
n-Hexane	0.01	0.01
Phenols	0.31	1.33
Styrene	0.01	0.01
Tetrachloroethylene**	0.08	0.34
Toluene	0.01	0.02
1,1,1-Trichloroethane**	0.01	0.01
Xylene	0.01	0.01

*Component of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

SN-27
Multiple Effect Evaporator

Source Description

The multiple effect evaporator (MEE) is used to concentrate the weak black liquor. The concentrated black liquor is sent through a soap removal system. The desaponified black liquor is then returned to the evaporator before being transferred to the strong black liquor storage group.

The non condensible gases from the evaporator are incinerated at source SN-12. No emissions are vented at the evaporator.

Source SN-27 is subject to the applicable provisions of 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*.

Specific Conditions

21. Source SN-27 is subject to 40 CFR Part 60, Subpart A, *General Provisions*, and 40 CFR Part 60, Subpart BB, *Standards of Performance for Kraft Pulp Mills*, due to an installation date after September 24, 1976. A copy of Subpart BB has been placed in Appendix E of this permit. The important requirements of this subpart are outlined in Specific Conditions 20 through 25.

22. Pursuant to 40 CFR §60.283(a)(1)(iii) and §19.304 and §19.804 of Regulation 19, the permittee shall combust all gases from source SN-27 at source SN-12 or as allowed at source SN-14 at a minimum temperature of 1200EF for a minimum of 0.5 seconds.

23. Pursuant to 40 CFR §60.284(b)(1) and §19.304 and §19.804 of Regulation 19, the permittee shall install, calibrate, maintain, and operate a monitoring device which measures and records the combustion temperature of the gases at SN-12 or SN-14. The monitoring device is to be certified by the manufacturer to be accurate within $\pm$ 1% of the temperature being measured.

24. Pursuant to 40 CFR §60.284d(3)(ii) and §19.304 and §19.804 of Regulation 19, for the purposes of reports required under §60.7(c), the permittee shall report semiannually periods of excess emissions from source SN-27. Excess emissions are defined as all periods in excess of 5 minutes and their duration during which the combustion temperature at the point of incineration is less than 1200EF.

25. Pursuant to 40 CFR §60.284(e) and §19.304 and §19.804 of Regulation 19, the Administrator will not consider periods of excess emissions reported under paragraph (d) of this section to be indicative of a violation of §60.11(d) provided that the Administrator determines that the affected facility, including air pollution control equipment, is maintained and operated in a manner which is consistent with good air pollution control practice for minimizing emissions during periods of excess emissions.

26. Pursuant to 40 CFR §63.443(c), §19.304 and §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the non-condensible gases from the multiple effect evaporators (evaporator hotwell) shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in §63.450. The lime kiln (SN-03), the NCG Incinerator (SN-12), and the NCG Back-Up Flare (SN-14) are control devices that may be used at this facility.

SN-26
Strong Black Liquor Storage Source Group

Source Description

Source SN-26, which was installed or last modified in 1996, consists of three black liquor storage tanks and associated equipment which store liquor either continuously or intermittently. It also consists of the combination tank and blow heat recovery tank and associated equipment which store both weak and strong black liquor periodically. The maximum throughput of the unit is limited by the firing rate of the recovery boilers of 390 gal/min of black liquor at the burner nozzles. The strong black liquor storage group stores the liquor from the MEE prior to sending it through the black liquor oxidation source group. No control equipment is associated with this source group.

Specific Conditions

27. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-26. Compliance with these emission rates will be determined through compliance with Specific Condition 29.

Pollutant	lb/hr	tpy
VOC	0.3	0.7
TRS	0.2	0.6

28. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The non-criteria pollutant emission rates listed below were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be demonstrated through compliance with Specific Condition 29.

Pollutant	lb/hr	tpy
Acetaldehyde	0.02	0.06
Benzene	0.01	0.01
Chloroform	0.01	0.01
Dimethyl Disulfide*	0.02	0.05
Dimethyl Sulfide*	0.08	0.23
Formaldehyde	0.01	0.01
H_2S*	0.1	0.3
Methanol	0.12	0.34
Methyl Ethyl Ketone	0.03	0.06
Methyl Isobutyl Ketone	0.01	0.01
Methyl Mercaptan*	0.01	0.01
n-Hexane	0.01	0.01
Styrene	0.01	0.01
Toluene	0.01	0.01
1,2,4-Trichlorobenzene	0.01	0.01
Xylene	0.01	0.01

*Component of TRS. Included in the TRS total.

29. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not process in excess of 496,382 tons of black liquor solids at source SN-26 in any consecutive twelve month period. Compliance with this specific condition will be verified through the record keeping requirements on the total amount of BLS fired at sources SN-04, SN-05, and SN-06.

30. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of black liquor solids processed at source SN-26 in order to demonstrate compliance with Specific Condition 29 and which may be used by the Department for enforcement purposes. The records of the amount of BLS fired in the recovery boilers may be used to fulfill the requirement of this specific condition. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

SN-18
Black Liquor Oxidation Source Group

Source Description

Source SN-18, which was installed or last modified in 1974, consists of a black liquor oxidation tank with its associated cyclone separator. The primary purpose of the black liquor oxidation system is to convert the sulfides in the black liquor to sulfates to minimize the TRS emissions from the recovery boilers. No control equipment in operation is associated with this source group.

Specific Conditions

31. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-18. Compliance with these emission rates will be determined through compliance with Specific Condition 29 and the testing requirements for this source.

Pollutant	lb/hr	tpy
VOC	121.5	531.1
TRS	25.0	62.2

32. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-18. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with Specific Condition 29 and the testing requirements for this source.

Pollutant	lb/hr	tpy
Acetone**	1.00	3.00
Acetophenone	0.03	0.11
Acrolein	0.01	0.01
Carbon Disulfide	0.55	2.41
Dimethyl Disulfide*	0.26	1.13
Dimethyl Sulfide*	0.82	3.57
Formaldehyde	0.07	0.31
H_2S*	10.3	44.9
Methanol	80.00	350.31
Methyl Ethyl Ketone	2.19	9.57
Methyl Isobutyl Ketone	0.02	0.09
Methyl Mercaptan	2.89	12.65
n-Hexane	0.01	0.01
Propionaldehyde	0.11	0.45
Styrene	0.02	0.09

*Component of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

SN-04/SN-05
Recovery Boiler #1

Source Description

Source SN-04/SN-05 is a 480 MMBTU/hr recovery boiler which was installed or last modified in 1967. This recovery boiler has not been modified since and is therefore not subject to any NSPS subpart. Recovery Boiler #1 vents through 2 separate stacks. Because of the difficulty involved in determining exactly what is being emitted through each stack, emissions for the two stacks have been "bubbled." The main purpose of this recovery boiler is to recover inorganic chemicals from black liquor. Natural gas may be fired at any time. The facility is permitted to fire a limited amount of #6 fuel oil in the event of natural gas curtailment and to test the oil burning capabilities of the equipment. Particulate matter emissions from this source are controlled with an electrostatic precipitator.

This source has a CEM to monitor the emissions of TRS. Annual testing is required for the emissions of carbon monoxide, particulate matter, and sulfur dioxide.

Specific Conditions

33. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table when burning BLS. Compliance with these rates will be determined through compliance with Specific Condition 42, proper operation of the control equipment, and the required testing for this recovery boiler.

Pollutant	lb/hr	tpy
PM_{10}	77.6	339.9
SO_2	262.6	1150.0
VOC	66.6	293.6
CO	412.6	1806.8
NO_x	192.0	400.0
Pb	0.02	0.02

34. Pursuant to §19.501 et seq and §19.804 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table when burning BLS. Compliance with these rates will be determined thru compliance with Specific Condition 42, proper operation of the control equipment and the CEMS required for this recovery boiler (Specific Condition 44). This TRS emission rate is based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	31.8	139.8

35. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, TRS emissions shall not exceed 40 ppm measured as H_2S on a dry basis and on a 12 hour average, corrected to 8% oxygen by volume at source SN-04/SN-05. Compliance with this specific condition will be demonstrated through compliance with Specific Condition 44.

36. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-04/05 when burning #6 fuel oil. Compliance with these emission rates will be determined through proper operation of the control equipment.

Pollutant	lb/hr	tpy
PM_{10}	25.5	*
SO_2	1318.8	*
VOC	66.6	*
CO	412.6	*
NO_x	192.0	*
Pb	0.02	*

*Annual emissions have been bubbled with sources SN-01 and SN-06 and may be found in the plantwide conditions.

37. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-04/05 when burning #6 fuel oil. Compliance with these emission rates will be determined through proper operation of the control equipment and the required CEMS for this recovery boiler. These emission rates are based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	31.8	*

*Annual emissions have been included in the emissions when firing BLS.

38. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 40% opacity from source SN-04/SN-05 as measured by EPA Reference Method 9 except that emissions greater than 40% opacity will be allowed for not more than six (6) minutes in the aggregate in any consecutive 60-minute period, provided that such emissions will not be permitted more than three (3) times during any 24-hour period. Compliance with this opacity limit will be shown through compliance with Specific Condition 39.

39. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-04/05 shall be conducted by a person trained, but not necessarily certified, in EPA Reference Method 9. If emissions which appear to be in excess of 30% are observed, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, the permittee shall conduct another observation of the opacity from source SN-04/05. If the opacity observed does not appear to be in excess of 30%, then no further action is needed and the permittee will be considered in compliance with the permitted opacity limit. If visible emissions which appear to be in excess of 30% are still observed, a 6-minute visible emissions reading shall be conducted by a person certified in EPA Reference Method 9 to determine if the opacity is less than 40%. If the opacity observed is not in excess of 40%, then no further action is needed and the permittee will be considered in compliance with the permitted opacity limit. If no Method 9 reading is conducted despite emissions appearing to be in excess of 30% after corrective action has been taken, the permittee shall be considered out of compliance with the permitted opacity limit for that day.

40. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-04/SN-05 when burning black liquor solids. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with Specific Condition 42 and proper operation of the control equipment for this recovery boiler.

Pollutant	lb/hr	tpy
PM	200.0	876.0
Acetaldehyde	3.19	13.97
Antimony Compounds	0.013	0.053
Arsenic Compounds	0.013	0.056
Benzene	0.03	0.11
Cadmium Compounds	0.011	0.048
Chromium Compounds	0.419	1.834
Cobalt Compounds	0.010	0.040
Formaldehyde	0.43	1.88
Hydrogen Chloride**	12.27	53.75
Lead Compounds	0.011	0.047
Manganese Compounds	0.629	2.76
Methanol	34.05	149.20
Methyl Ethyl Ketone	0.38	1.63
Methyl Mercaptan*	6.06	26.60
Nickel Compounds	0.075	0.329
Phenols	1.56	6.84

Pollutant	lb/hr	tpy
Selenium Compounds	0.001	0.001
Styrene	0.13	0.53

*Component of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

41. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at SN-04 when burning #6 fuel oil. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through proper operation of the control equipment associated with this recovery boiler.

Pollutant	lb/hr	tpy
PM	35.8	**
Antimony Compounds	0.065	**
Arsenic Compounds	0.012	**
Beryllium Compounds	0.001	**
Cadmium Compounds	0.002	**
Chromium Compounds	0.007	**
Cobalt Compounds	0.045	**
Formaldehyde	0.18	**
Hydrogen Chloride*	3.12	**
Hydrogen Fluoride*	0.16	**
Lead Compounds	0.010	**
Manganese Compounds	0.036	**
Mercury Compounds	0.001	**

Pollutant	lb/hr	tpy
Nickel Compounds	0.31	**
POM	0.01	**
Selenium Compounds	0.004	**

*Non-VOC, non-PM non-criteria pollutant.
**Annual emissions have been bubbled with sources SN-01 and SN-06 and may be found in the plantwide conditions.

42. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not process in excess of 392,886 tons of black liquor solids at source SN-04/SN-05 in any consecutive twelve month period.

43. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of black liquor solids processed at source SN-04/SN-05 in order to demonstrate compliance with Specific Condition 42 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

44. Pursuant to §19.703 and §19.804 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a CEMS at source SN-04/SN-05 for TRS. The CEMS requirements which the permittee must comply with may be found in Appendix A.

45. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-04/SN-05 for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place less than 9 months and no more than 15 months apart.

46. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-04/SN-05 for sulfur dioxide using EPA Reference Method 6C. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

47. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-04/SN-05 for carbon monoxide using EPA Reference Method 10. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

48. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall not bypass the ESP at this source during required maintenance. In the event that a boiler is not shut down during ESP maintenance, one side of the ESP shall be isolated. During such times, the operation of source SN-04/SN-05 shall be limited to 50% of the full service load rating. (NOTE: If the maintenance does not affect operation of the ESP at this source, the permittee is not restricted by the Department on the service load rating.)

49. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall notify the Department within 24 hours of any maintenance which requires one side of the ESP being removed from service.

SN-06
Recovery Boilers #2 and #3

Source Description

Source SN-06 consists of two recovery boilers which were installed or last modified in 1947. These recovery boilers have a combined heat input capacity of 632 MMBTU/hr. The main purpose of these recovery boilers is to recover inorganic chemicals from black liquor. Natural gas may be fired in these recovery boilers at any time. The facility is permitted to fire a limited amount of #6 fuel oil in the event of natural gas curtailment and to test the oil burning capabilities of the equipment. Particulate matter emissions from this source are controlled with an electrostatic precipitator.

This source has a CEM to monitor the emissions of TRS. Annual testing is required for the emissions of carbon monoxide, particulate matter, and sulfur dioxide.

Specific Conditions

50. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-06 when burning black liquor solids. Compliance with these emission rates will be determined through compliance with Specific Condition 59, proper operation of the control equipment, and the required testing for these recovery boilers.

Pollutant	lb/hr	tpy
PM_{10}	13.2	57.9
SO_2	240.6	1054.0
VOC	162.3	710.6
CO	454.0	1988.0
NO_x	242.0	700.0
Pb	0.01	0.01

51. Pursuant to §19.501 et seq and §19.804 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-06 when burning black liquor solids. Compliance with these emission rates will be determined through compliance with Specific Condition 59, proper operation of the control equipment, and the CEMS for these recovery boilers. These emission rates were based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	37.2	163.0

52. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, TRS emissions shall not exceed 40 ppm measured as H_2S on a dry basis and on a 12 hour average, corrected to 8% oxygen by volume at source SN-06. Compliance with this specific condition will be demonstrated through compliance with Specific Condition 61.

53. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-06 when burning #6 fuel oil. Compliance with these emission rates will be determined through proper operation of the control equipment.

Pollutant	lb/hr	tpy
PM_{10}	29.1	*
SO_2	1507.2	*
VOC	2.4	*
CO	16.0	*
NO_x	214.0	*
Pb	0.01	*

*Annual emissions have been bubbled with sources SN-01 and SN-04/05 and may be found in the plantwide conditions.

54. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-06 when burning #6 fuel oil. Compliance with these emission rates will be determined through proper operation of the control equipment and the CEMS required for these recovery boilers. These emission rates were based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	37.2	*

*Annual emissions are included in the emission rates when firing BLS.

55. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-06 as measured by EPA Reference Method 9 except that emissions greater than 20% opacity will be allowed for not more than six (6) minutes in the aggregate in any consecutive 60-minute period, provided that such emissions will not be permitted more than three (3) times during any 24-hour period. Compliance with this opacity limit will be shown through compliance with Specific Condition 56.

56. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-03 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

57. Pursuant to §18.801 of Regulation 18 and A.C.A. §8.4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-06 when burning black liquor solids. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with Specific Condition 59 and proper operation of the control equipment for these recovery boilers.

Pollutant	lb/hr	tpy
PM	75.0	306.6
Acetaldehyde	3.03	13.27
Antimony Compounds	0.012	0.048
Arsenic Compounds	0.012	0.051
Benzene	0.03	0.10
Cadmium Compounds	0.010	0.044
Chromium Compounds	0.390	1.690
Cobalt Compounds	0.009	0.037
Formaldehyde	0.41	1.79
Hydrogen Chloride**	11.25	49.27
Lead Compounds	0.010	0.043
Manganese Compounds	0.580	2.530
Methanol	32.34	141.65
Methyl Ethyl Ketone	0.36	1.55
Methyl Mercaptan*	5.56	24.4
Nickel Compounds	0.069	0.310
Phenols	1.43	6.27
Selenium Compounds	0.001	0.001

Pollutant	lb/hr	tpy
Styrene	0.12	0.51
Toluene	0.08	0.34

*Component of TRS. Included in the TRS total.
**Non-VOC non-criteria pollutant.

58. Pursuant to §18.801 of Regulation 18 and A.C.A. §8.4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at SN-06 when burning #6 fuel oil. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through proper operation of the control equipment associated with these recovery boilers.

Pollutant	lb/hr	tpy
PM	40.9	**
Antimony Compounds	0.074	**
Arsenic Compounds	0.014	**
Beryllium Compounds	0.001	**
Cadmium Compounds	0.002	**
Chromium Compounds	0.008	**
Cobalt Compounds	0.051	**
Formaldehyde	0.20	**
Hydrogen Chloride*	3.57	**
Hydrogen Fluoride*	0.18	**
Lead Compounds	0.011	**
Manganese Compounds	0.041	**
Mercury Compounds	0.001	**

Pollutant	lb/hr	tpy
Nickel Compounds	0.35	**
POM	0.01	**
Selenium Compounds	0.004	**

*Non-VOC, non-PM non-criteria pollutant.
*Annual emissions have been bubbled with sources SN-01 and SN-04/05 and may be found in the plantwide conditions.

59. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not process in excess of 361,757 tons of black liquor solids at source SN-06 in any consecutive twelve month period.

60. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of black liquor solids processed at source SN-06 in order to demonstrate compliance with Specific Condition 59 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

61. Pursuant to §19.703 and §19.804 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a CEMS at source SN-06 for TRS. The CEMS requirements which the permittee must comply with may be found in Appendix A.

62. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-06 for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

63. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-06 for sulfur dioxide using EPA Reference Method 6C. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

64. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-06 for carbon monoxide using EPA Reference Method 10. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

65. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, when an ESP is shut down for maintenance, the permittee shall not operate the boiler associated with that ESP. The service load rating is not affected if any maintenance is being performed which does not affect either of the ESPs located at SN-06. (NOTE: SN-06 is actually two boilers which both have an ESP.)

SN-07
Smelt Tank #1

Source Description

This source was installed or last modified in 1967. A wet scrubber is used to control the particulate matter and TRS emissions. The scrubbing liquids used for this piece of control equipment are weak wash, alkaline solution, or water.

Annual testing for particulate matter and TRS emissions was required in permit #725-AR-2 and is being carried forth in this permit. Additional testing is being required for VOC and methanol emissions.

Specific Conditions

66. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-07. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-04/05, proper operation of the control equipment, and the required testing for this smelt dissolving tank.

Pollutant	lb/hr	tpy
PM_{10}	25.0	110.0
SO_2	7.5	32.9
VOC	28.0	122.3
NO_x	12.9	56.7
Pb	0.01	0.01

67. Pursuant to §19.501 et seq and §19.804 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-07. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-04/05, proper operation of the control equipment, and the required testing for this smelt dissolving tank. These emission rates were based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	1.5	6.6

68. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, TRS emissions shall not exceed 0.0168 grams of H_2S per kilogram of black liquor solids on a 12 hour average from source SN-07. Compliance with this specific condition will be demonstrated through compliance with Specific Condition 73.

69. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-07. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-04/05, proper operation of the control equipment, and the required testing for this smelt dissolving tank.

Pollutant	lb/hr	tpy
PM	25.0	110.0
Ammonia*	16.80	73.60
Antimony Compounds	0.002	0.005
Arsenic Compounds	0.001	0.002
Benzene	0.02	0.09
Beryllium Compounds	0.001	0.001
Cadmium Compounds	0.001	0.001

Pollutant	lb/hr	tpy
Chlorobenzene	0.01	0.04
Chromium Compounds	0.002	0.009
Lead Compounds	0.001	0.004
Manganese Compounds	0.008	0.032
Mercury Compounds	0.001	0.001
Methanol	26.15	115.00
Methyl Ethyl Ketone	0.11	0.45
Methyl Isobutyl Ketone	0.06	0.25
Nickel Compounds	0.001	0.002
Selenium Compounds	0.001	0.001
Styrene	0.01	0.03
Toluene	0.04	0.15
Trichloroethylene	0.02	0.08
Xylene	0.03	0.11

*Non-HAP, non-VOC, non-criteria pollutant.

70. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-07 as measured by EPA Reference Method 9. Compliance with this opacity limit will be shown through compliance with Specific Condition 71.

71. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-07 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

72. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-07 for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

73. Pursuant to §19.702 and §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at source SN-07 for TRS using EPA Reference Method 16. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

74. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain the following at source SN-07:

    a. A monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within a gage pressure of $\pm$500 Pascals (ca. $\pm$ 2 inches water gage pressure).

    b. A monitoring device for the continuous measurement of the scrubbing liquid flow rate to the control equipment. The monitoring device is to be certified by the manufacturer to accurate within $\pm$ 15 percent of design scrubbing liquid supply pressure. The pressure sensor or tap is to be located close to the scrubber liquid discharge point.

SN-08 and SN-09
Smelt Tanks #2 and #3

Source Description

Sources SN-08 and SN-09 were installed or last modified in 1947. Wet scrubbers are used to control the particulate matter and TRS emissions. The scrubbing liquids used are weak wash, alkaline solution, or water.

Annual testing for particulate matter and TRS emissions was required in permit #725-AR-2 and is being carried forth in this permit. Additional testing is being required for VOC and methanol emissions.

Specific Conditions

75. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-06, proper operation of the control equipment, and the required testing for these two smelt dissolving tanks.

Pollutant	lb/hr at SN-08	lb/hr at SN-09	tpy*
PM_{10}	8.4	9.0	76.3
SO_2	3.6	3.2	29.5
VOC	13.6	12.2	115.5
NO_x	6.1	5.5	51.0
Pb	0.01	0.01	0.02

*These are the combined totals for sources SN-08 and SN-09 and not individual limits for each source.

76. Pursuant to §19.501 et seq and §19.804 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-06, proper operation of the control equipment, and the required testing for these two smelt dissolving tanks. These emission rates were based upon a 12-hour average.

Pollutant	lb/hr at SN-08	lb/hr at SN-09	tpy*
TRS	0.7	0.6	5.8

*These are the combined totals for sources SN-08 and SN-09 and not individual limits for each source.

77. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, TRS emissions shall not exceed 0.0168 grams of H_2S per kilogram of black liquor solids on a 12 hour average from sources SN-08 and SN-09. Compliance with this specific condition will be demonstrated through compliance with Specific Condition 82.

78. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the BLS firing limit for source SN-06, proper operation of the control equipment, and the required testing for these two smelt dissolving tanks.

Pollutant	lb/hr at SN-08	lb/hr at SN-09	tpy**
PM	8.4	9.0	76.3
Ammonia*	7.96	7.17	66.23
Antimony Compounds	0.001	0.001	0.005
Arsenic Compounds	0.001	0.001	0.002
Benzene	0.01	0.01	0.08
Beryllium Compounds	0.001	0.001	0.001
Cadmium Compounds	0.001	0.001	0.001

Pollutant	lb/hr at SN-08	lb/hr at SN-09	tpy**
Chlorobenzene	0.01	0.01	0.04
Chromium Compounds	0.001	0.001	0.008
Lead Compounds	0.001	0.001	0.004
Manganese Compounds	0.004	0.004	0.030
Mercury Compounds	0.001	0.001	0.001
Methanol	12.70	11.41	105.50
Methyl Ethyl Ketone	0.05	0.05	0.42
Methyl Isobutyl Ketone	0.03	0.03	0.23
Nickel Compounds	0.001	0.001	0.002
Selenium Compounds	0.001	0.001	0.001
Styrene	0.01	0.01	0.03
Toluene	0.02	0.02	0.13
Trichloroethylene	0.01	0.01	0.07
Xylene	0.02	0.01	0.10

*Non-HAP, non-VOC, non-criteria pollutant.
**These are the combined totals for sources SN-08 and SN-09 and not individual limits for each source.

79. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-08 and SN-09 as measured by EPA Reference Method 9. Compliance with this opacity limit will be shown through compliance with Specific Condition 80.

80. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from sources SN-08 and SN-09 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

81. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at sources SN-08 and SN-09 for particulate matter using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

82. Pursuant to §19.702 and §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing at sources SN-08 and SN-09 for TRS using EPA Reference Method 16. These tests shall be conducted in accordance with Plantwide Condition #3 and shall take place no less than 9 months and no more than 15 months apart.

83. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain the following at sources SN-08 and SN-09:

    a. A monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within a gage pressure of $\pm$500 Pascals (ca. $\pm$ 2 inches water gage pressure).

    b. A monitoring device for the continuous measurement of the scrubbing liquid flow rate to the control equipment. The monitoring device is to be certified by the manufacturer to accurate within $\pm$ 15 percent of design scrubbing liquid supply pressure. The pressure sensor or tap is to be located close to the scrubber liquid discharge point.

CAUSTICIZING AREA

International Paper Company
CSN: 52-0013 Permit #:725-AOP-R2

SN-28, SN-29, SN-30, SN-32, SN-33, and SN-34
Causticizing Area Sources

Source Description

Source SN-28 is used to store the green liquor prior to it being reacted with calcium oxide (lime) to form white liquor. This source group, which was installed or last modified in 1975, consists of two green liquor storage tanks and associated equipment.

Source SN-29, which was installed or last modified in 1947, consists of the green liquor clarifier and associated equipment. The clarifier removes contaminants from the green liquid prior to it being sent to the slaker.

Source SN-30 is the dregs washer. The contaminants removed at sources SN-28 and SN-29 are washed at the dregs washer prior to being discarded.

Source SN-32, which was installed or last modified in 1981, consists of five causticizers and their associated equipment. White liquor from the slaker passes through the causticizer prior to being sent to storage.

Source SN-33, which was installed or last modified in 1947, consists of four white liquor storage tanks and their associated equipment. After the white liquor is clarified, it may be stored prior to usage in the mill.

Source SN-34, which was installed or last modified in 1983, consists of two white liquor clarifiers and associated equipment. The lime mud which was formed in the slaker and the causticizer is removed from the white liquor in one of the two clarifiers. The lime mud is sent to storage and washing (considered to be a source of de minimis emissions). The white liquor is then sent to storage.

No control equipment is associated with any of these sources.

Specific Conditions

84. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. Compliance with these emission rates will be determined through compliance with the limit on the amount of lime that may be processed at this facility.

SN	Pollutant	lb/hr	tpy
28, 29, 30, 32, 33, & 34	VOC	7.4	31.2
	TRS	0.3	0.8

85. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at the designated sources. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the limit on the amount of lime that may be processed at this facility.

SN	Pollutant	lb/hr	tpy
28, 29, 30, 32, 33, & 34	Acetaldehyde	0.34	1.34
	Acrolein	0.03	0.03
	Ammonia**	67.87	297.24
	Benzene	0.05	0.05
	Dimethyl Disulfide*	0.11	0.46
	Dimethyl Sulfide*	0.02	0.06
	Methanol	5.98	26.11
	Methyl Ethyl Ketone	0.07	0.14
	Methyl Isobutyl Ketone	0.05	0.05
	Methyl Mercaptan*	0.04	0.10
	Styrene	0.06	0.06
	Toluene	0.06	0.06
	Xylene	0.06	0.06

*Component of TRS.
**Non-criteria, non-VOC pollutant.

SN-03
Lime Kiln

Source Description

The lime kiln was installed or last modified in 1967. The lime kiln is used to regenerate the calcium oxide used in the slaker from the lime mud which is separated from the white liquor.

A wet scrubber is used to control the emissions of sulfur dioxide and particulate matter from the lime kiln. A CEM is used to track the emissions of TRS from the lime kiln. Annual testing for particulate matter is also required for the lime kiln.

The facility is permitted to fire #6 fuel oil at any time at this source. The facility is also allowed to use natural gas to fire the lime kiln at any time.

Specific Conditions

86. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-03. Compliance with these emission rates will be demonstrated through compliance with fuel usage limits, the limit on the amount of lime that may be processed at this facility, proper operation of the control equipment associated with this lime kiln, and the required testing.

Pollutant	lb/hr	tpy
PM_{10}	34.9	152.9
SO_2	17.4	76.3
VOC	5.1	22.3
CO	35.0	153.3
NO_x	44.8	196.0
Pb	1.1	4.5

87. Pursuant to §19.501 et seq and §19.804 of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-03. Compliance with these emission rates will be demonstrated through compliance with fuel usage limits, the limit on the amount of lime that may be processed at this facility, proper operation of the control equipment associated with this lime kiln, and the required CEMS. These emission rates were based upon a 12-hour average.

Pollutant	lb/hr	tpy
TRS	7.4	19.1

88. Pursuant to §19.804 of Regulation 19 and 40 CFR Part 52, Subpart E, TRS emissions from source SN-03 shall not exceed 40 ppm measured as H_2S on a dry basis and on a 12 hour average, corrected to 10% oxygen by volume.

89. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-03 as measured by EPA Reference Method 9 except that emissions greater than 20% opacity will be allowed for not more than six (6) minutes in the aggregate in any consecutive 60-minute period, provided that such emissions will not be permitted more than three (3) times during any 24-hour period. Compliance with this opacity limit will be shown through compliance with Specific Condition 90.

90. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-03 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

91. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-03. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be demonstrated through compliance with fuel usage limits, the limit on the amount of lime that may be processed at this facility, and proper operation of the control equipment associated with this lime kiln.

Pollutant	lb/hr	tpy
PM	70.0	306.6
Acetaldehyde	0.39	1.71
Acetone	0.51	2.23
Acrolein	0.02	0.08
Antimony Compounds	0.001	0.001
Arsenic Compounds	0.001	0.002
Benzene	0.03	0.12
Beryllium Compounds	0.001	0.002
Cadmium Compounds	0.006	0.023
Carbon Disulfide	0.05	0.19
Chromium Compounds	0.020	0.050
Cobalt Compounds	0.003	0.014
Dimethyl Disulfide*	0.15	0.65
Dimethyl Sulfide*	1.45	6.34
Formaldehyde	0.04	0.14
Hydrogen Chloride**	0.56	2.45
Hydrogen Fluoride**	0.03	0.12
H_2S*	1.9	8.3

Pollutant	lb/hr	tpy
Lead Compounds	0.019	0.082
Manganese Compounds	0.164	0.72
Mercury Compounds	0.002	0.008
Methanol	3.46	15.13
Methyl Ethyl Ketone	0.04	0.14
Methyl Isobutyl Ketone	0.01	0.04
Nickel Compounds	0.013	0.055
POM	0.01	0.01
Selenium Compounds	0.001	0.001
Styrene	0.02	0.06
Toluene	0.09	0.39
Xylene	0.07	0.29

*Component of TRS.
**Non-VOC, non-HAP, non-criteria pollutant.

92. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall only burn #6 fuel oil and pipeline quality natural gas at source SN-03.

93. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not burn in excess of 4.38 million gallons of #6 fuel oil in any consecutive twelve month period at source SN-03.

94. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of fuel oil fired at SN-03 in order to demonstrate compliance with Specific Condition 93 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

95. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing for particulate matter emissions from source SN-03 using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and take place no less than 9 months and no more than 15 months apart.

96. Pursuant to §19.703 and §19.804 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a Continuous Emissions Monitoring System (CEMS) at source SN-03 for TRS. The CEM standards which the permittee is required to comply with may be found in Appendix A.

97. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.443(d)(4), if the lime kiln is used as a HAP control device, the permittee shall introduce the HAP emission stream from the closed vent system into the flame zone of the lime kiln or with the primary fuel.

98. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.443(e)(1), if the lime kiln is used as a HAP control device, periods of excess emissions reported under §63.455 shall not be a violation of §63.443(d)(4) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed one percent for the lime kiln.

SN-31
Lime Handling Source Group

Source Description

The lime handling source group consists of a hot lime chain, a lime bucket elevator, a lime crusher, reburn lime silo, and associated equipment. A baghouse was installed in late 1997 or early 1998 to control the emissions from the lime handling operations.

Specific Conditions

99. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-31. Compliance with these emission rates will be demonstrated through compliance with the limit on the amount of lime that may be processed at this facility, proper operation of the control equipment associated with this source, and the testing requirements for this source.

Pollutant	lb/hr	tpy
PM_{10}	1.0	4.4

100. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-31. Compliance with these emission rates will be demonstrated through compliance with the limit on the amount of lime that may be processed at this facility, proper operation of the control equipment associated with this source, and the testing requirements for this source.

Pollutant	lb/hr	tpy
PM	1.0	4.4

101. Pursuant to §18.503 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-31 as measured by EPA Reference Method 9. Compliance with this opacity limit will be shown through compliance with Specific Condition 102.

102. Pursuant to§18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct weekly observations of the opacity from source SN-31 and keep a record of these observations. If visible emissions are detected, the permittee shall take immediate action to identify and to correct the cause of the visible emissions. After any necessary corrective action has taken place, the permittee shall conduct another observation of the opacity from source SN-31 to confirm that no visible emissions are present. If corrective action was needed, the permittee shall record the cause of the visible emissions, the corrective action taken, and if visible emissions were observed afterwards. These records shall be kept on site and made available to Department personnel upon request.

SN-02
Slaker

Source Description

The slaker was installed or last modified in 1980. Clarified green liquor, fresh lime, and reburned lime are reacted in the slaker to form sodium hydroxide and calcium carbonate. A wet scrubber is used to control the emissions from the slaker.

Specific Conditions

103. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-02. Compliance with these emission rates will be demonstrated through compliance with the limit on the amount of lime that may be processed at this facility, proper operation of the control equipment associated with this source, and the testing requirements.

Pollutant	lb/hr	tpy
PM_{10}	5.0	21.9
VOC	3.3	14.2
TRS	0.1	0.2

104. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-02 as measured by EPA Reference Method 9. Compliance with this opacity limit will be shown through compliance with Specific Condition 105.

105. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-02 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

106. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-02. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be shown through compliance with the limit on the amount of lime that may be processed at this facility as well as proper operation of the control equipment associated with this source.

Pollutant	lb/hr	tpy
PM	5.0	21.9
Acetaldehyde	0.26	1.11
Ammonia**	67.87	297.24
Dimethyl Disulfide*	0.05	0.20
Methanol	2.90	12.71
Methyl Ethyl Ketone	0.02	0.09
Styrene	0.01	0.01
Toluene	0.01	0.01
Xylene	0.01	0.01

*Component of TRS.
**Non-VOC, non-HAP, non-criteria pollutant.

NCG SYSTEM

SN-12 and SN-14
NCG Incinerator and Back-Up Flare

Source Description

The NCG Incinerator was installed or last modified in 1988. This natural gas fired source incinerates the non-condensible gases from the multiple effect evaporator and the turpentine recovery system. (NOTE: The NCGs from the digesters are routed through the turpentine recovery system.) Source SN-14 was installed or last modified in 1992. The back-up flare is maintained in the event of primary incinerator failure.

There are two special requirements for this source because source SN-27 is subject to 40 CFR Part 60, Subpart BB. These requirements are outlined in Specific Conditions 137 and 138. The increase in VOC emissions from this source is due to the method of calculation. Due to discrepancy in testing methods, the total of HAPs which are also VOCs is often higher than the VOC tested rate.

Source SN-14 meets the definition of an enclosed combuster contained in 40 CFR §60.751 and therefore is not subject to the provisions for an open flame type flare contained in 40 CFR §63.11.

Sources SN-12 and SN-14 are subject to the applicable requirements of 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*.

Specific Conditions

107. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the combined emission rates set forth in the following table at SN-12 and SN-14 when firing natural gas. Compliance with these emission rates will be determined through compliance with fuel usage limits as well as maintaining the temperature and the residence time required by 40 CFR Part 60, Subpart BB.

SN	Pollutant	lb/hr	tpy
12	PM_{10}	0.2	0.9
	SO_2	10.9	15.2
	VOC	4.0	17.3
	CO	9.4	41.1
	NO_x	7.3	32.1
	TRS	1.8	4.3

SN	Pollutant	lb/hr	tpy
14	PM_{10}	0.2	0.2
	SO_2	544.8	74.3
	VOC	3.0	3.1
	CO	9.4	5.7
	NO_x	7.3	4.4
	TRS	7.6	2.3

108. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from sources SN-12 and SN-14 as measured by EPA Reference Method 9 except that emissions greater than 20% opacity will be allowed for not more than six (6) minutes in the aggregate in any consecutive 60-minute period, provided that such emissions will not be permitted more than three (3) times during any 24-hour period. Compliance with this opacity limit will be shown through compliance with Specific Condition 111.

109. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at sources SN-12 and SN-14 when firing natural gas. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be shown through compliance with fuel usage limits and maintaining the temperature and the residence time required by 40 CFR Part 60, Subpart BB.

SN	Pollutant	lb/hr	tpy
12	PM	0.2	0.9
	Acetone	1.42	6.22
	Benzene	0.08	0.19
	Cumene	0.04	0.14
	Formaldehyde	0.80	2.04
	Methanol	1.96	8.58
	Methyl Ethyl Ketone	0.01	0.02
	Styrene	0.01	0.02
	Xylene	0.01	0.01
14	PM	0.2	0.2
	Acetone	1.42	0.85
	Benzene	0.08	0.03
	Cumene	0.04	0.01
	Formaldehyde	0.80	0.24
	Methanol	1.96	1.89
	Methyl Ethyl Ketone	0.01	0.01
	Styrene	0.01	0.01
	Xylene	0.01	0.01

110. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel fired at source SN-12.

111. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, daily observations of the opacity from sources SN-12 and SN-14 (when operating) shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from source SN-12 shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emissions observations, the cause of any excess visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on site and made available to Department personnel upon request.

112. Pursuant to 40 CFR §60.283(a)(1)(iii) and §19.304 and §19.804 of Regulation 19, the permittee shall combust all gases from source SN-27 at source SN-12 or as allowed at source SN-14 at a minimum temperature of 1200EF for a minimum of 0.5 seconds.

113. Pursuant to 40 CFR §60.284(b)(1) and §19.304 and §19.804 of Regulation 19, the permittee shall install, calibrate, maintain, and operate a monitoring device which measures and records the combustion temperature of the gases at SN-12 or SN-14. The monitoring device is to be certified by the manufacturer to be accurate within $\pm$ 1% of the temperature being measured.

114. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the NCG Back-Up Flare shall not be operated in excess of 1200 hours in any consecutive twelve month period.

115. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the hours of operation of source SN-14 in order to demonstrate compliance with Specific Condition 114 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request.

116. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.443(d), the NCG Incinerator (SN-12) shall meet one of the following requirements in order to achieve the overall HAP emission reductions.

    1. Reduce total HAP emissions by 98% or more by weight;
    2. Reduce the total HAP concentration at the outlet of the thermal oxidizer to 20 ppm or less by volume, corrected to 10% oxygen on a dry basis; or
    3. Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 1600EF and a minimum residence time of 0.75 seconds.

117. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.443(d)(3), the NCG Back-Up Flare (SN-14) shall meet a minimum temperature requirement of 1600EF and a minimum residence time of 0.75 seconds in order to achieve the overall HAP emissions reductions.

118. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.443(e)(1), periods of excess emissions shall not be a violation provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed one percent.

119. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.11(b)(1), the permittee shall monitor the NCG Back-Up Flare (SN-14) to assure that the flare is operated and maintained in conformance with its design.

120. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.11(b)(3), the NCG Back-Up Flare shall be operated at all times when emissions are vented to it except for periods of startup, shutdown, and malfunction.

121. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(b), the permittee shall install, calibrate, certify, and maintain (according to manufacturer's specifications) a continuous monitoring system (CMS) on the NCG Incinerator and the NCG Back-Up Flare. The CMS shall be operated to measure the temperature in the firebox in order to ensure the efficient incineration of the non-condensible gases.

122. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(n), during the performance test on the NCG Incinerator, the permittee shall establish a minimum temperature value or range in order to demonstrate continuous compliance with the destruction requirement or outlet HAP (as methanol) concentration requirement.

123. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(o), the permittee shall operate the NCG Incinerator and the NCG Back-Up Flare consistent with the minimum operating temperatures as established. Operation of either control device below the minimum temperature value (caused by events other than those in the facility's startup, shutdown, and malfunction plan) shall constitute a violation of the applicable emission standard and be reported as a period of excess emissions except as provided for in Specific Condition 118.

124. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(a), the permittee shall perform an initial performance test by October 15, 2001, on the NCG Incinerator (SN-12) to ensure that the control device meets one of the requirements listed in Specific Condition 117. If compliance with the minimum temperature and residence time standard cannot be demonstrated through calculations, an initial performance test shall be conducted in order to demonstrate compliance with either the 98% reduction requirement or the 20 ppmv corrected to 10% O_2 outlet HAP (as methanol) concentration requirement.

125. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457, the permittee shall comply with the following requirements if the NCG Incinerator (SN-12) can not meet the minimum temperature and residence time requirements as specified in Specific Condition 117.

A. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(f), the permittee shall measure methanol concentration at the outlet of the NCG Incinerator (SN-12) in order to demonstrate compliance with the total HAP emission reduction or outlet concentration requirements during the initial performance test.

B. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(i), the permittee shall sample the vent gas stream out of the NCG Incinerator (SN-12) during the initial performance test using Reference Method 308 as identified in 40 CFR Part 63, Subpart S in order to demonstrate compliance with the percent reduction requirement.

C. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(k), the permittee shall correct the methanol concentration measured at the outlet of the NCG Incinerator (SN-12) to 10% O_2 using the following equation in order to demonstrate compliance with the 20 ppmv concentration requirement.

$$\text{Methanol ppm (10\% } O_2\text{)} = \frac{\text{Methanol ppm (dry basis, actual measured } O_2\%) * 10.9\%}{(20.9\% - \text{Actual measured } O_2\%, \text{ dry basis})}$$

POWER BOILERS

SN-13
Cogeneration Unit

Source Description

The cogeneration unit (rated at 27 MW) was installed or last modified in 1990. The cogeneration unit consists of a natural gas fired turbine and a natural gas fired duct burner. The cogeneration unit is used to produce power for use throughout the facility.

This source underwent PSD review for emissions of NO_x and CO in permit #725-AR-2. Steam injection and low NO_x burners are used to reduce the NO_x emissions from this unit.

The cogeneration unit is subject to the provisions of 40 CFR Part 60, Subpart GG. The initial testing required by this NSPS subpart has been performed.

Specific Conditions

126. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-13 when firing natural gas. Compliance with these emission rates will be shown through compliance with the fuel usage limitations.

Pollutant	lb/hr	tpy
PM_{10}	5.6	24.6
SO_2	0.4	1.5
VOC	2.8	12.1

127. Pursuant to §19.501 et seq and §19.901 et seq of Regulation 19, and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at source SN-11. Compliance with these emission rates will be shown through compliance with fuel usage limitations and the use of steam injection at this source.

Pollutant	lb/hr	tpy
CO	51.6	226.2
NO_x	93.3	408.8

128. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-13. Compliance with these emission rates will be shown through compliance with the fuel usage limitations.

Pollutant	lb/hr	tpy
PM	5.6	24.6

129. Pursuant to §18.503 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-13 as measured by EPA Reference Method 9. Compliance with this opacity limit will be shown through compliance with Specific Condition 130.

130. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, pipeline quality natural gas shall be the only fuel used to fire this source.

131. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, natural gas usage at the gas turbine shall not exceed 351 Mscf/hr.

132. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, natural gas usage at the duct burner shall not exceed 238 Mscf/hr.

133. Pursuant to §19.705 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall continue to maintain a separate strip chart recorder to measure the gas used by the gas turbine and the duct burner. The recorders shall be inspected and adjusted once every twelve hours. The strip chart shall also measure the date and the time in addition to the gas flow. The strip charts shall be maintained on site for at least two years and shall be made available to Department personnel upon request.

134. Pursuant to §19.703 and §19.901 et seq of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain a continuous emissions monitoring systems for CO and NO_x at source SN-13. The standards for the CEMS may be found in Appendix A.

135. Source SN-13 is subject to 40 CFR Part 60, Subpart A, *General Provisions*, and 40 CFR Part 60, Subpart GG, *Standards of Performance for Stationary Gas Turbines* due to an installation date of 1990 and a heat input at peak load greater than 10.7 gigajoules per hour. A copy of Subpart GG has been placed in Appendix B of this permit. The important requirements of this subpart are outlined in Specific Conditions 136 through 141.

136. Pursuant to 40 CFR 60.332(a)(2) and §19.304 of Regulation 19, the permittee shall not cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxides in excess of 150 ppm (at 15% oxygen and on a dry basis).

137. Pursuant to 40 CFR 60.332(f) and §19.304 of Regulation 19, the limit set forth in Specific Condition 136 may be exceeded when ice fog is deemed to be a traffic hazard by the owner or operator of the gas turbine.

138. Pursuant to 40 CFR 60.333(a) and §19.304 of Regulation 19, the permittee shall not cause from any stationary gas turbine any gases which contain sulfur dioxide in excess of 0.015% by volume at 15% oxygen and on a dry basis. Compliance with this specific condition will be demonstrated through compliance with Specific Condition 139.

139. Pursuant to 40 CFR 60.333(b) and §19.304 of Regulation 19, the permittee shall not burn in any stationary gas turbine any fuel which contains sulfur in excess of 0.8% by weight.

140. Pursuant to 40 CFR 60.334(b) and §19.304 of Regulation 19, the owner or operator of any stationary gas turbine subject to the provisions of this subpart shall monitor sulfur content and nitrogen content of the fuel being fired in the turbine as outlined in the following custom schedule:

    A. Monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel fired in the gas turbine.
    B. Analysis for fuel sulfur content of the natural gas shall be conducted using one of the approved ASTM reference methods for the measurement of sulfur in gaseous fuels, or an approved alternative method. The approved reference methods are: ASTM D1072-80, ASTM D3031-81, ASTM D3246-81, and ASTM D4084-82 as referenced in 40 CFR 60.335(b)(2). The Gas Processors Association (GPA) test method entitled “Test for Hydrogen Sulfide and Carbon Dioxide in Natural Gas Using Length of Stain Tubes” (GPA Standard 2377-86) is an approved alternative method.
    C. The fuel supply shall be initially sampled daily for a period of two weeks to establish that the pipeline quality natural gas fuel supply is low in sulfur content. This requirement has already been fulfilled by the permittee.

D. After the monitoring required in Item C above, sulfur monitoring shall be conducted twice monthly for six months. If this monitoring shows little variability in the fuel sulfur content, and indicates consistent compliance with 40 CFR 60.333, then sulfur monitoring shall be conducted once per quarter for six quarters. This requirement will be fulfilled in January 2000.

E. If after the monitoring required in Item D above, or herein, the sulfur content of the fuel shows little variability and, calculated as sulfur dioxide, represents consistent compliance with the sulfur dioxide emission limits specified under 40 CFR 60.333, sample analysis shall be conducted twice per annum. This monitoring shall be conducted during the first and third quarters of each calendar year.

F. Should any sulfur analysis as required in Items D or E above indicated noncompliance with 40 CFR 60.333, IP Camden shall notify the ADEQ of such excess emissions and the custom schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom schedule is being re-examined.

G If there is a change in fuel supply (supplier), the fuel shall be sampled daily for a period of two weeks to re-establish for the record that the fuel supply is low in sulfur content. If the fuel supply's low sulfur content is re-established, then the custom fuel monitoring schedule can be resumed.

H. Records of sample analysis and fuel supply pertinent to this custom schedule shall be retained for a period of three years, and be available for inspection by EPA or ADEQ personnel.

141. Pursuant to 40 CFR 60.334(c)(2) and §19.304 of Regulation 19, for the purpose of reports required under §60.7(c), periods of excess emissions are defined as follows for sulfur dioxide: any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8%.

SN-01
Bark/Gas Boiler

Source Description

Source SN-01 is a 225 MMBTU/hr boiler which was installed in 1947. The main fuels for this boiler are natural gas, tire derived fuel (TDF), bark, and wood waste (sawdust, billet ends, and hardwood pallets). The facility is permitted to burn a limited amount of #6 fuel oil in the event of natural gas curtailment or to test the fuel burning capability of the equipment. The permittee is also allowed to fire sawdust containing small amounts of fuel oil from cleanups, small amounts of waste paper, and small amounts of lubricating oil incidentally burned from contact with the conveyor systems. Emissions from this source are controlled with a wet scrubber. While the source is burning natural gas and/or mill wood waste, water is used as a scrubbing liquor. When #6 fuel oil is being fired, a caustic scrubbing liquid is used.

Annual testing is required for carbon monoxide and particulate matter emissions.

Specific Conditions

142. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-01 when firing natural gas, wood waste, box plant clippings, shredded corrugated cardboard containers, and/or TDF. Compliance with these emission rates will be determined through compliance with the fuel usage and steam production limits, proper operation of the control equipment associated with this boiler, and the testing requirements for this boiler.

Pollutant	lb/hr	tpy
PM_{10}	62.5	273.8
SO_2	3.8	16.6
VOC	28.0	122.6
CO	619.0	2711.0
NO_x	110.0	482.0

143. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-01 when firing #6 fuel oil. Compliance with these emission rates will be determined through proper operation of the control equipment associated with this boiler and the testing requirements for this boiler.

Pollutant	lb/hr	tpy
PM_{10}	54.5	*
SO_2	706.5	*
VOC	1.2	*
CO	7.5	*
NO_x	100.5	*
Pb	0.05	*

*Annual emissions have been bubbled with sources SN-04/05 and SN-06 and may be found in the plantwide conditions.

144. Pursuant to§19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed 20% opacity from source SN-01 as measured by EPA Reference Method 9 except that emissions greater than 40% opacity will be allowed for not more than six (6) minutes in the aggregate in any consecutive 60-minute period, provided that such emissions will not be permitted more than three (3) times during any 24-hour period. Compliance with this opacity limit will be shown through compliance with Specific Condition 145.

145. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, daily observations of the opacity from source SN-01 shall be conducted by a person trained (but not necessarily certified) in EPA Reference Method 9. If emissions which appear to be in excess of 20% are observed, the permittee shall take immediate action to identify and correct the cause of the excess visible emissions. After corrective action has been taken, another observation of the opacity from the source in question shall be conducted in order to either confirm that no excess visible emissions are present or that the source is out of compliance with the permitted opacity limit. The permittee shall maintain records of all visible emission observations, the cause of any excessive visible emissions, the corrective action taken, and if excess visible emissions were present after corrective action was taken. These records shall be kept on site and shall be made available to Department personnel upon request.

146. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-01 when firing natural gas, wood waste, box plant clippings, shredded corrugated cardboard containers, and/or TDF. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the fuel usage and steam production limits and proper operation of the control equipment associated with this boiler.

Pollutant	lb/hr	tpy
PM	75.0	328.5
Acetaldehyde	0.08	0.34
Acrolein	0.01	0.01
Arsenic Compounds	0.007	0.030
Benzene	0.09	0.40
Cadmium Compounds	0.001	0.003
Carbon Disulfide	0.03	0.13
Chloroform	0.01	0.01
Chromium Compounds	0.002	0.006
Cobalt Compounds	0.014	0.060
Cumene	0.01	0.01
Dibenzofurans	0.01	0.01
Formaldehyde	0.17	0.73
Hydrogen Chloride	0.08	0.34
Lead Compounds	0.020	0.086
Manganese Compounds	0.927	4.06
Mercury Compounds	0.001	0.002
Methanol	0.32	1.38

Pollutant	lb/hr	tpy
Methyl Ethyl Ketone	0.01	0.01
Methyl Isobutyl Ketone	0.05	0.21
Methylene Chloride*	0.21	0.92
Napthalene	0.06	0.26
Nickel Compounds	0.018	0.079
n-Hexane	0.13	0.55
Phenols	0.01	0.05
POM	0.07	0.31
Selenium Compounds	0.001	0.004
Styrene	0.01	0.02
Toluene	0.01	0.01
1,1,1-Trichloroethane	0.01	0.01
Trichloroethylene	0.01	0.01
Xylene	0.01	0.01
Zinc	25.67	112.49

*Non-VOC HAP.

147. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at SN-01 when firing #6 fuel oil. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through proper operation of the control equipment associated with this source.

Pollutant	lb/hr	tpy
PM	76.7	**
Antimony Compounds	0.035	**
Arsenic Compounds	0.007	**
Beryllium Compounds	0.001	**
Cadmium Compounds	0.001	**
Chromium Compounds	0.004	**
Cobalt Compounds	0.024	**
Formaldehyde	0.10	**
Hydrogen Chloride*	1.67	**
Hydrogen Fluoride*	0.09	**
Lead Compounds	0.006	**
Manganese Compounds	0.019	**
Mercury Compounds	0.001	**
Nickel Compounds	0.161	**
POM	0.01	**
Selenium Compounds	0.002	**

*Non-VOC, non-criteria pollutant
**Annual emissions have been bubbled with sources SN-04/05 and SN-06 and may be found in the plantwide conditions.

148. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall only fire pipeline quality natural gas, bark, wood waste (sawdust, billet ends, and hardwood pallets), TDF, sawdust containing small amounts of fuel oil from cleanups, small amounts of waste paper, small amounts of lubricating oil incidentally burned from contact with the conveyor systems, box plant clippings, shredded corrugated cardboard containers, and#6 fuel oil at source SN-01. The permittee may also use diesel fuel for starting bark fires.

149. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, steam production shall not exceed 1,314,000,000 pounds in any consecutive twelve month period.

150. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the steam production at source SN-01 in order to demonstrate compliance with Specific Condition 149 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual total shall be submitted to the Department in accordance with General Provision 7.

151. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-31,1 and 40 CFR 70.6, the permittee shall not fire in excess of 210 tons of TDF at source SN-01 per week.

152. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of TDF fired at source SN-01 in order to demonstrate compliance with Specific Condition 151 and which may be used by the Department for enforcement purposes. These records shall be updated weekly, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual total shall be submitted to the Department in accordance with General Provision 7.

153. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing for carbon monoxide emissions from source SN-01 using EPA Reference Method 10. These tests shall be conducted in accordance with Plantwide Condition #3 and take place no less than 9 months and no more than 15 months apart.

154. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall conduct annual testing for particulate matter emissions from source SN-01 using EPA Reference Method 5. These tests shall be conducted in accordance with Plantwide Condition #3 and take place no less than 9 months and no more than 15 months apart.

SN-47
Package Boiler

Source Description

Source SN-47 is a package boiler which will be used to provide supplemental steam to various parts of the plant whenever another boiler is out of service for maintenance, etc. This source will only be on site whenever it is needed. The permittee will be required to comply with any applicable NSPS subpart (This will be dependent upon the size of the boiler being used.).

Natural gas will be the only fuel that this source will be permitted to fire. As this source will only be used when another boiler is out of service, there will be no net increase in emissions. Also, restrictions on the amount of fuel that may be fired in this boiler are being taken in order to stay below the PSD significant increase levels.

Specific Conditions

155. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-47. Compliance with these emission rates will be determined through compliance with Specific Condition 159.

Pollutant	lb/hr	tpy
PM_{10}	5.5	6.6
SO_2	0.2	0.2
VOC	0.4	0.4
CO	50.0	60.0
NO_x	25.0	30.0

156. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-47. Compliance with these emission rates will be determined through compliance with Specific Condition 159.

Pollutant	lb/hr	tpy
PM	5.5	6.6

157. Pursuant to §18.503 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed 5% opacity from source SN-47 as measured by EPA Reference Method 9. Compliance with this opacity limit will be demonstrated by compliance with Specific Condition 158.

158. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, pipeline quality natural gas shall be the only fuel used to fire the package boiler.

159. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas usage shall not exceed 575 MMSCF at source SN-47 in any consecutive twelve month period.

160. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of natural gas fired at source SN-47 in order to demonstrate compliance with Specific Condition 159 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

161. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the heat input capacity of source SN-47 shall not exceed 250 MMBTU/hr.

162. Source SN-47 is potentially subject to 40 CFR Part 60, Subpart A, *General Provisions*, and 40 CFR Part 60, Subpart Dc - *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*. Source SN-47 will only be subject to this subpart if the facility chooses to install a boiler which has a heat input capacity between 10 MMBTU/hr and 100 MMBTU/hr. The important requirements of this subpart are outlined in Specific Conditions 163 and 164. A copy of Subpart Dc has been included in Appendix C.

163. Pursuant to 40 CFR 60.48c(g) and §19.304 of Regulation 19, the permittee shall record and maintain records of the amount of natural gas combusted during each day.

164. Pursuant to 40 CFR 60.48c(i) and §19.304 of Regulation 19, the permittee shall maintain the records required by Specific Condition 163 for a period of two years following the date of such record.

165. Source SN-47 is potentially subject to 40 CFR Part 60, Subpart A, *General Provisions*, and 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*. This source will be subject to this subpart if the facility chooses to install a boiler which has a heat input capacity greater than 100 MMBTU/hr. The important requirements of this subpart are outlined in Specific Conditions 166 through 183. A copy of subpart Db has been included in Appendix D.

166. Pursuant to 40 CFR 60.44b(a) and §19.304 of Regulation 19, the permittee shall not cause to be discharged to the atmosphere any gases that contain oxides of nitrogen in excess of 0.10 lb/MMBTU (expressed as NO_2).

167. Pursuant to 40 CFR 60.44b(a) and §19.304 of Regulation 19, the heat release rate shall not exceed 70,000 BTU/hr ft^3.

168. Pursuant to 40 CFR 60.46b(h) and §19.304 of Regulation 19, the oxides of nitrogen standards set forth in Specific Condition 166 shall apply at all times including periods of startup, shutdown, or malfunction.

169. Pursuant to 40 CFR 60.46b(e) and §19.304 of Regulation 19, to determine compliance with the emission limits for nitrogen oxides required under §60.44b, the owner or operator of an affected facility shall conduct the performance test as required under §60.8 using the continuous system for monitoring nitrogen oxides under §60.48b (Specific Condition 172).

170. Pursuant to 40 CFR 60.46b(e)(1), §19.304 and §19.702 of Regulation 19, and 40 CFR Part 52, Subpart E, for the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission standards under §60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.

171. Pursuant to 40 CFR 60.46b(e)(4), following the date on which the initial performance test is completed or required to be completed under §60.8 of this subpart, whichever date comes first, the owner or operator of an affected facility which has a heat input capacity of 73 MW (250 million BTU/hr) or less and which combusts natural gas shall upon request determine compliance with the nitrogen oxide standards under §60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, nitrogen oxides emission data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports but will not be used to determine compliance with the nitrogen oxides emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all hourly nitrogen oxides emission data for the preceding 30 steam generating unit operating days.

172. Pursuant to 40 CFR 60.48b(b), §19.304 and §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring nitrogen oxides emissions discharged to the atmosphere and record the output of the system.

173. Pursuant to 40 CFR 60.48b(c) and §19.304 of Regulation 19, the continuous monitoring system required under paragraph (b) of this section shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

174. Pursuant to 40 CFR 60.48b(c) and §19.304 of Regulation 19, the 1-hour average nitrogen oxides emission rates measured by the continuous nitrogen oxides monitor required by paragraph (b) of this section shall be expressed in ng/J or lb/million BTU heat input and shall be used to calculate the average emission rates under §60.44b. The 1-hour averages shall be calculated using the data points required under §60.13(b). At least 2 data points must be used to calculate each 1-hour average.

175. Pursuant to 40 CFR 60.48b(e) and §19.304 of Regulation 19, the procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system.

176. Pursuant to 40 CFR 60.48b(e)(2) and §19.304 of Regulation 19, the span value for the nitrogen oxides emission monitor shall be 500 ppm.

177. Pursuant to 40 CFR 60.49b(a) and §19.304 of Regulation 19, the permittee shall submit notification of initial startup as provided by §60.7. This notification shall include the following:

    a. The heat design input capacity of the affected facility and identification of the fuels to be combusted in the affected facility.

    b. If applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §§60.44b.

    c. The annual capacity factor at which the owner or operator anticipates operating the facility based on all fuels fired and based on each individual fuel fired.

178. Pursuant to 40 CFR 60.49b(d) and §19.304 of Regulation 19, the owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for coal, distillate oil, residual oil, natural gas, wood, and municipal-type solid waste for each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

179. Pursuant to 40 CFR 60.49b(g) and §19.304 of Regulation 19, except as provided for under paragraph (p) of this section, the owner or operator of an affected facility subject to the nitrogen oxides standards under §60.44b shall maintain records of the following information for each steam generating unit operating day.

    a. Calendar date

    b. The average hourly nitrogen oxides emission rates (expressed as NO_2) (ng/J or lb/million BTU heat input) measured or predicted

    c. The 30-day average nitrogen oxides emission rates (ng/J or lb/million BTU heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.

    d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.

e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective action taken.

f. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.

g. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.

h. Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.

i. Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.

j. Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1.

180. Pursuant to 40 CFR 60.49b(h)(2) and §19.304 of Regulation 19, the owner or operator of any affected facility that is subject to the nitrogen oxides standards of §60.44b, combusts natural gas, has a heat input capacity less than 73 MW (250 million BTU/hr), and is required to monitor nitrogen oxides emissions on a continuous basis under §60.48b(g)(1) or steam generating unit operating conditions under §60.48b(g)(2), shall submit excess emission reports for any calendar quarter during which there are excess emissions from the affected facility. If there are no excess emissions during the calendar quarter, the owner or operator shall submit a report semiannually stating that no excess emissions occurred during the semiannual reporting period.

181. Pursuant to 40 CFR 60.49b(h)(4) and §19.304 of Regulation 19, for purposes of §60.48b(g)(1), excess emissions are defined as any calculated 30-day rolling average nitrogen oxides emission rate, as determined under §60.46b(e), which exceeds the applicable emission limits in §60.44b.

182. Pursuant to 40 CFR 60.49b(i) and §19.304 of Regulation 19, the owner or operator of any affected facility subject to the continuous monitoring requirements for nitrogen oxides under §60.48b shall submit a quarterly report containing the information recorded under paragraph (g) of this section. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter.

183. Pursuant to 40 CFR 60.49b(o) and §19.304 of Regulation 19, all records required under this section shall be maintained by the owner or operator of the affected facility for a period of 2 years following the date of such record.

184. Pursuant to§19.705 of Regulation 19, and 40 CFR 70.6, the permittee shall maintain records of the dates which the package boiler was brought on site, when operation of the boiler began, when operation of the boiler ceased, and when the boiler was removed from this facility. The permittee shall also maintain records of the heat input capacity of the boiler and compliance date with any applicable NSPS requirements. These records shall be updated within one week of the boiler being brought in or taken out, kept on site for a minimum of two years following the date of such record, and shall be made available to Department personnel upon request.

185. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall only operate source SN-47 when another boiler is out of operation. However, if a boiler is subject to 40 CFR Part 60, Subpart Dc or is not subject to any NSPS subpart, the permittee may startup SN-47 a maximum of 72 hours prior to the boiler it is temporarily replacing is off line and the permittee may also operate SN-47 for a maximum of 48 hours after the permanent boiler is brought back on line. The permittee may maintain a warming fire in the boiler whenever it is on site in the event that the ambient temperature falls below freezing.

186. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which will demonstrate compliance with Specific Condition 185 and which may be used by the Department for enforcement purposes. These records shall be kept on site and made available to Department personnel upon request.

PAPER MILL

SN-35
Paper Mill Source Group

Source Description

The paper mill source group consists of the pulp and whitewater storage tanks and chests in the stock preparation area and all sections of the paper machine from the headbox to the reel for all three paper machines. It is in the paper mill source group where the pulp is converted to paper on one of the three machines. No control equipment is associated with the paper mill source group.

Specific Conditions

187. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-35. Compliance with these emission rates will be determined through compliance with the limit on the amount of paper that may be produced at this facility.

Pollutant	lb/hr	tpy
VOC	161.6	707.6

188. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-35. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be determined through compliance with the amount of paper that may be produced at this facility.

Pollutant	lb/hr	tpy
Acetaldehyde	2.05	8.98
Acrolein	0.27	1.18
Benzene	0.02	0.09
Chlorobenzene	0.04	0.17
Ethylene Glycol	0.44	1.92
Formaldehyde	1.23	5.37
Methanol	75.12	329.00
Methyl Ethyl Ketone	0.46	1.99
Methyl Isobutyl Ketone	0.04	0.16
Methylene Chloride*	0.24	1.03
Napthalene	0.14	0.62
n-Hexane	0.02	0.09
Styrene	0.10	0.42
Tetrachloroethylene*	0.31	1.34
Toluene	0.02	0.09
1,2,4-Trichlorobenzene	0.56	2.41
1,1,1-Trichloroethane	0.09	0.40
1,1,2-Trichloroethane	0.11	0.46
Xylenes	0.07	0.28

*Non-VOC non-criteria pollutant

189. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not produce more than 438,000 tons of paper at the paper mill in any consecutive twelve month period.

190. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of paper produced at source SN-35 in order to demonstrate compliance with Specific Condition 189 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

WASTEWATER COLLECTION & TREATMENT AERATION STABILIZATION BASIN
PROCESS SEWER NON-POINT SOURCES

SN-16
Aeration Stabilization Basin & Process Sewer Non-Point Sources

Source Description

The waste water treatment process at the Camden mill consists of a wetlands area, collection, screening, clarification, neutralization, aeration, settling, sludge dewatering, and disposal.

All process water is collected from the various process area sumps and pumped through the process sewer mains. The sewer mains also receive landfill leachate and surface drainage from culverts in various areas of the site.

The emissions from source SN-16 are related to the amount of pulp that is produced. Therefore, compliance with the emission rates will be demonstrated through compliance with the limit on the amount of ADTP that can be produced.

Source SN-16 is subject to the provisions of 40 CFR Part 63, Subpart S. The pulping condensate streams from some but not necessarily all of the following equipment will be collected in a hard piping system and routed to SN-16 for biological treatment.

A. Evaporator Hot Well
B. Evaporator Surface Condenser
C. Turpentine Decanter Underflow
D. Turpentine Storage Underflow
E. Blow Tank Condenser Condensate
F. NCG Drains

Specific Conditions

191. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-16. Compliance with these emission rates will be demonstrated through compliance with the amount of ADTP that may be produced.

Pollutant	lb/hr	tpy
VOC	9.1	39.9
TRS	1.2	4.1

192. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-16. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be demonstrated through compliance with the amount of ADTP that may be produced.

Pollutant	lb/hr	tpy
Acetaldehyde	1.36	5.96
Carbon Disulfide	0.11	0.45
Dimethyl Disulfide*	0.06	0.23
Dimethyl Sulfide*	0.85	3.70
H_2S*	0.1	0.1
Methanol	0.68	2.96
Methyl Ethyl Ketone	0.03	0.11
Methyl Isobutyl Ketone	0.01	0.03
Methyl Mercaptan*	0.02	0.05

*Component of TRS.

193. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.446(b), the permittee shall collect the pulping condensate streams from some but not necessarily all of the following equipment in a hard piping system and deliver the condensate streams to the ASB for biological treatment.

A. Evaporator Hot Well
B. Evaporator Surface Condenser
C. Turpentine Decanter Underflow
D. Turpentine Storage Underflow
E. Blow Tank Condenser Condensate
F. NCG Drains

194. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.446(e)(2), the permittee shall discharge the collected pulping process condensate streams below the liquid surface of the Aerated Stabilization Basin (SN-16).

195. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.446(e)(3), the permittee shall demonstrate one of the following removal efficiencies in order to demonstrate compliance with the total HAP treatment requirement. Compliance shall be met by removing at least 6.6 lb/ODTP of HAPs as measured as methanol, methyl ethyl ketone, acetaldehyde, and propionaldehyde.

A. 92% destruction of total HAPs (with methanol as a surrogate)
B. (6.6 + 7.2R) lb/ODTP of total HAPs destroyed
where: $R = \frac{\text{(sum of non methanol HAPs, concentration)}}{\text{(sum of total HAPs, concentration)}}$

Note: EPA has verbally agreed in meetings with industry representatives to allow a lb/ODTP removal standard as an alternative to the 92% destruction requirement. For non-bleach mills, this alternative removal requirement is (6.6 + 7.2R) lb/ODTP, where R = (sum of non-methanol HAPs, concentration)/(sum of total HAPs, concentration)

196. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(j)(1) and (m), the permittee shall monitor the following parameters on a daily basis from source SN-16, ASB. The permittee may install and operated a CMS to monitor other appropriate operating parameters that demonstrate continuous compliance with the control requirements.

A. Composite daily sample of outlet soluble BOD_5 concentration to monitor for maximum daily and maximum monthly average;
B. Mixed liquor volatile suspended solids;
C. Horsepower of aerator unit(s);
D. Inlet liquid flow; and
E. Liquid temperature.

Note: The industry and EPA are working to finalize a procedure which would permit the use of the lb/ODTP option for demonstrating compliance with the HAP removal requirement for open biological treatment systems, allow flexibility in defining alternate operating parameters to monitor, such as COD, to demonstrate continuous compliance, and provide guidance on acceptable averaging periods. In accordance with the ongoing discussions with EPA, the mill will perform a baseline characterization of the waste treatment system to establish thoroughly mixed zones and other appropriate emissions modeling system parameters. Mill-specific procedures for initial performance and

continuous compliance demonstrations will be submitted to the department after the industries discussions with EPA are complete. A rule change is expected.

197. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(j)(2), the permittee shall obtain daily inlet and outlet grab samples from the ASB (SN-16) in order to have the HAP data available to perform the quarterly percent reduction tests and the compliance percent reduction tests. The following procedures shall be followed with the liquid samples.

A. Store the samples for 5 days. The 5 day storage is required since the soluble BOD_5 test requires 5 days to obtain results. If the results of the soluble BOD_5 test are outside of the range established during the initial performance test, then archive sample shall be used to perform the percent reduction test.

B. Perform the percent reduction test procedures within 45 days after the beginning of each quarter as follows.

i. The percent reduction test performed in the first quarter (annually) shall be performed for HAPs and methanol and the percent reduction obtained from the test shall be at least as great as the total HAP reduction specified in Specific Condition 195.

ii. The remaining quarterly percent reduction tests shall be performed for methanol and the percent reduction obtained shall be at least as great as the methanol reduction determined in the previous first quarter test.

iii. The parameter values used to calculate the percent reductions shall be parameter values measured per Specific Condition 196.

Note: The industry and EPA are working to finalize a procedure which would permit the use of the lb/ODTP option for demonstrating compliance with the HAP removal requirement for open biological treatment systems, allow flexibility in defining alternate operating parameters to monitor, such as COD, to demonstrate continuous compliance, and provide guidance on acceptable averaging periods. In accordance with the ongoing discussions with EPA, the mill will perform a baseline characterization of the waste treatment system to establish thoroughly mixed zones and other appropriate emissions modeling system parameters. Mill-specific procedures for initial performance and continuous compliance demonstrations will be submitted to the department after the industries discussions with EPA are complete. A rule change is expected.

198. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(n), the permittee shall submit the following information to the Department prior to the initial compliance testing in order to demonstrate compliance with the condensate treatment requirements.

A. The methodology to be used,
B. The parameters to be monitored, and
C. The rationale for using those parameters.

199. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(n), the permittee shall submit the results of the initial performance tests, along with an analysis identifying acceptable parameter ranges for the parameters required to be monitored to the Department upon completion of the required performance tests.

200. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(o), the permittee shall submit to the Department after the initial performance test the methodology to be used to assess periods of excess emissions from the condensate treatment system if the monitored parameters are out-of-range. Instances where emissions are in excess of the appropriate standard, but are caused by events identified in the mill's startup, shutdown, and malfunction plan (required by 40 CFR §63.6) will not be considered in the calculation of periods of excess emissions.

201. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(p), the permittee shall perform all the following requirements when the monitoring parameters specified in Specific Condition 196 are below or above the minimum and maximum operating values as established.

A. Determine the compliance removal efficiency using the percent reduction test procedures specified in 40 CFR §63.457(l) and the monitoring data specified in 40 CFR §63.457(j)(1) that coincide with the time period of the parameter excursion;
B. Steps shall be taken to repair or adjust the operation of the process to end the parameter excursion period; and
C. Steps shall be taken to minimize total HAP emissions to the atmosphere during the parameter excursion period.

202. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(c)(1), liquid samples shall be collected using the sampling procedures specified in Method 305 of Part 60, appendix A, including the following:

A. Where feasible, samples shall be taken from an enclosed pipe prior to the liquid stream being exposed to the atmosphere; and
B. When sampling from an enclosed pipe is not feasible, samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of HAP compounds prior to sampling.

203. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457 (c)(2), the volumetric flow rate of the entering and exiting liquid streams shall be determined using inlet and outlet flow meters or other methods demonstrated to the Administrator's satisfaction. The volumetric flow rate measurements to determine actual mass removal shall be taken at the same time as the concentration measurements.

204. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.457(c)(3), when gathering liquid samples for HAP analysis purposes, the permittee shall conduct a minimum of three test runs that are representative of normal conditions and average the resulting pollutant concentrations. The minimum sampling time for each test run shall be 1 hour and the grab or composite samples shall be taken at approximately equally spaced intervals over the 1 hour test run period. The owner or operator shall use one of the following procedures to determine total HAP or methanol concentration:

A. Method 305 in Appendix A of this part, adjusted using equation contained in 40 CFR 457(c)(3)(i); or
B. NCASI Method DI/MEOH-94.02, Methanol in Process Liquids by GC/FID, August 1998, Methods Manual, NCASI, Research Triangle Park, NC, for determining methanol concentrations.

205. Pursuant to §19.304 of Regulation 19 and 40 CFR 457(c)(4), the permittee shall use Method 405.1 of Part 136 to determine soluble BOD_5 in the effluent stream from a biological treatment unit with the modifications contained in §63.457(c)(i) and (ii).

ACTIVE LANDFILLS

SN-36
East Landfill

Source Description

The east landfill is the only active landfill located at this facility. At this time, there are two other landfills which have been closed and no longer accept any plant refuse.

The emissions from this source are limited by the amount of plant refuse that can be accepted by this landfill.

Specific Conditions

206. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-36. Compliance with these emission rates will be demonstrated through compliance with the limit on the amount of mill waste that may be placed in the landfill.

Pollutant	lb/hr	tpy
VOC	0.8	3.3
CO	0.1	0.3
TRS	0.1	0.3

207. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be demonstrated through compliance with the limit on the amount of mill waste that may be placed in the landfill.

Pollutant	lb/hr	tpy
Acrylonitrile	0.01	0.02
Benzene	0.01	0.01

Pollutant	lb/hr	tpy
Carbon Disulfide	0.01	0.01
Carbonyl Sulfide	0.02	0.05
Chlorobenzene	0.01	0.01
Chloroform	0.01	0.01
Dimethyl Sulfide*	0.04	0.16
Ethyl Benzene	0.01	0.02
H_2S*	0.1	0.1
Methyl Ethyl Ketone	0.01	0.02
Methyl Isobutyl Ketone	0.01	0.01
Methylene Chloride**	0.01	0.04
Methyl Carpatan*	0.01	0.02
n-Hexane	0.01	0.02
1,1,2,2-Tetrachloroethane	0.01	0.01
Tetrachlorethylene	0.01	0.02
Toluene	0.01	0.03
1,1,1-Trichloroethane**	0.01	0.01
Trichloroethylene	0.01	0.01
Vinyl Chloride	0.01	0.02
Xylene	0.01	0.05

*Includes TRS components which are also considered to be VOCs.
**Component of TRS. Included in the TRS total.

208. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall use source SN-36 for plant refuse only.

209. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, source SN-36 shall not accept in excess of 113,200 cubic yards of plant refuse in any consecutive twelve month period. For the purposes of this permit, 1 uncompacted cubic yard shall equal 300 pounds.

210. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of plant refuse accepted at source SN-36 in order to demonstrate compliance with Specific Condition 209 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

FUEL STORAGE

SN-37
Gasoline Storage Tank

Source Description

Source SN-37 is a horizontal fixed roof tank with a capacity of approximately 1763 gallons. The facility is permitted to store only gasoline at this source. This tank is used to store fuel for the vehicles used around the facility.

Specific Conditions

211. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-37. Compliance with these emission rates will be determined by compliance with Specific Conditions 212 and 213.

Pollutant	lb/hr	tpy
VOC	22.8	0.5

212. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall store only gasoline at source SN-37.

213. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, throughput of gasoline at source SN-37 shall not exceed 39,900 gallons of gasoline in any consecutive twelve month period.

214. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the gasoline throughput at source SN-37 in order to demonstrate compliance with Specific Condition 213 and which may be used by the Department for enforcement purposes. The records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

MILL SHUTDOWN EQUIPMENT

SN-48
Air Compressors

Source Description

The air compressors will be used when one or more of the electrical air compressors is out of service. These air compressors do not include the smaller units which may be found in Group B of the Insignificant Activities List.

Specific Conditions

215. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-48. Compliance with these emission rates will be demonstrated through compliance with Specific Conditions 217 and 218.

Pollutant	lb/hr	tpy
PM_{10}	2.0	2.5
SO_2	1.8	2.3
VOC	2.3	2.9
CO	5.9	7.4
NO_X	27.2	34.3

216. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-48. The non-criteria pollutant emission rates listed below, excluding PM, were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. Compliance with these emission rates will be demonstrated through compliance with Specific Conditions 217 and 218.

Pollutant	lb/hr	tpy
PM	2.0	2.5
Acetaldehyde	0.05	0.01

Pollutant	lb/hr	tpy
Acrolein	0.01	0.01
Aldehydes	0.06	0.01
Benzene	0.06	0.01
Formaldehyde	0.07	0.01
Napthalene	0.01	0.01
PAH	0.01	0.01
Toluene	0.01	0.01
Xylenes	0.02	0.01

217. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, diesel fuel with a sulfur content not to exceed 3% by weight shall be the only fuel used to fire the air compressors.

218. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not use in excess of 113,400 gallons of diesel fuel at the air compressors in any consecutive twelve month period.

219. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the diesel fuel usage at source SN-48 and the sulfur content of the fuel in order to demonstrate compliance with Specific Conditions 217 and 218 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

220. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR 70.6, the permittee shall only operate source SN-48 when the electrical air compressors are out of service.

221. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which will demonstrate compliance with Specific Condition 220 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

SN-49
Shutdown Equipment

Source Description

The shutdown equipment will consist mainly of generators which will supply some power to the facility when the mill is in a shutdown mode.

Specific Conditions

222. Pursuant to §19.501et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission rates set forth in the following table at SN-49. Compliance with these emission rates will be demonstrated through compliance with Specific Conditions 224, 225, and 227.

Pollutant	lb/hr	tpy
PM_{10}	18.4	0.5
SO_2	17.2	0.5
VOC	27.5	0.7
CO	187.4	4.6
NO_X	261.8	6.3

223. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table at source SN-49. Compliance with these emission rates will be demonstrated through compliance with Specific Conditions 224, 225, and 227.

Pollutant	lb/hr	tpy
PM	18.4	0.5

224. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, diesel fuel with a sulfur content not to exceed 3% by weight and gasoline shall be the only fuels used to fire source SN-49.

225. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not use in excess of 20,520 gallons of diesel fuel at source SN-49 in any consecutive twelve month period.

226. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the diesel fuel usage at source SN-49 and the sulfur content in order to demonstrate compliance with Specific Conditions 224 and 225 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

227. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not use in excess of 805 gallons of gasoline at the source SN-49 in any consecutive twelve month period.

228. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the gasoline usage at source SN-49 in order to demonstrate compliance with Specific Condition 227 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

229. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall only operate source SN-49 during full or partial mill shutdowns. The permittee is allowed to operate this source for up to 48 hours prior to mill shut down and up to 48 after mill operations begin.

230. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records which will demonstrate compliance with Specific Condition 229 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the tenth day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

40 CFR Part 63, Subpart S Requirements for the LVHC Source Group
and the Condensate Collection System Source Group

International Paper Company
CSN: 52-0013 Permit #:725-AOP-R2

LVHC Source Group

Source Description

Non-condensible gases from the following sources are routed through the closed vent system and sent to efficient incineration in either the Lime Kiln (SN-03), the NCG Incinerator (SN-12), or the NCG Back-Up Flare (SN-13). #1 through #7 are associated with other source groups at this facility. Most of the applicable requirements of 40 CFR Part 63, Subpart S, for sources SN-20, SN-21, and SN-27 are under this source group for clarity.

1. Evaporator Hotwell (SN-27)
2. Turpentine Condensers (SN-21)
3. Turpentine Decanter (SN-21)
4. #1 and #2 Low Pressure Feeders (SN-20)
5. Blow Tank (SN-20)
6. After Blow Tank Condenser (SN-20)
7. Turpentine Decanter Foul Condensate Tank (SN-21)
8. Foul Condensate Collection Tank
9. NCG Drain Points

Specific Conditions

231. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the NCG Pre-Scrubber shall be operated at all times when LVHC gases are being collected and treated in sources SN-03, SN-12, or SN-14. The permittee may bypass this scrubber for 400 hours in any consecutive twelve month period. Fifty hours of this down time may occur when emissions are being vented to source SN-14.

232. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the hours in which the NCG Pre-Scrubber is bypassed and whether those hours occur when emissions are being vented to source SN-14 in order to demonstrate compliance with Specific Condition 231 and which may be used by the Department for enforcement purposes. These records shall be updated by the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

233. Pursuant to 40 CFR §63.443(a)(1)(i), §19.304 and §19.705 of Regulation 19, 40 CFR 70.6, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the owner or operator of each pulping system using the kraft process subject to the requirements of this subpart shall control the total HAP emissions from each LVHC system.

234. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.450(b), the permittee shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in §63.457(e). (Specific Condition 238) Each enclosure or hood opening closed during the initial performance test specified in §63.457(a) (Specific Condition 241) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.

235. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.450(c), the permittee shall maintain the portion of the closed vent system that is operated at positive pressure and located prior to a control device with no detectable leaks as indicated by an instrument reading of less than 500 ppmv above background as measured by the procedures in §63.457(d). This portion includes the LVHC system segments downstream of the ejectors and the NCG Scrubber.

236. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.450(d)(1), the permittee shall install, calibrate, maintain, and operate (according to manufacturer's specifications) a computer controlled valve position flow indicator on each of the following bypass lines that provides a record of the presence of a gas stream flow in the line at least once every 15 minutes.

Turpentine Decanter Bypass Line
#1 and #2 Low Pressure Feeders Bypass Line
Blow Tank Bypass Line
After Blow Tank Condenser Bypass Line
Foul Condensate Collection Tank Bypass Line
NCG Drain Points Bypass Line

237. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.450(d)(2), the permittee shall maintain the valves on the following bypass lines in the closed position and equipped with a seal.

Evaporator Hotwell Bypass Line
Turpentine Condensers Bypass Line

238. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(1), the permittee shall perform a visual inspection of each enclosure opening at least every 30 days to ensure the opening is maintained in the same closed and sealed position as during the performance test except when necessary to use the opening for sampling, inspection, maintenance, or repairs.

239. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(2), the permittee shall conduct a visual inspection of each closed vent system at least every 30 days. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

240. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(3), the permittee shall perform initial and subsequent annual tests to demonstrate that no detectable leaks are present in each component of the closed-vent system operated at positive pressure. This includes the LVHC system segments downstream of the ejectors and the NCG Scrubber. The tests shall be conducted using the procedure outlined in 40 CFR Part 63.457(d) and:

Method 21, of 40 CFR Part 60, Appendix A; and
The instrument specified in Method 21 shall be calibrated before use according to the procedures specified in Method 21 on each day that leak checks are performed. The following calibration gases shall be used:
Zero air (less than 10 parts per million by volume of hydrocarbon in air); and
A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 parts per million by volume methane or n-hexane.

241. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(4), the permittee shall perform initial and subsequent annual tests to demonstrate that each enclosure opening of the closed-vent system is maintained at negative pressure. The tests shall be conducted using one of the following procedures.

An anemometer to demonstrate flow in the enclosure opening.
Measure the static pressure across the opening.
Smoke tubes to demonstrate flow into the enclosure opening.
Any other industrial ventilation test method demonstrated to the Department's satisfaction.

242. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(5), the permittee shall inspect the valve and seal on the following bypass lines at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.

Evaporator Hotwell Bypass Line
Turpentine Condensers Bypass Line

243. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(6), the permittee shall undertake the following corrective actions as soon as practicable if an inspection required by paragraphs (k)(1) through (k)(5) of this section(Specific Conditions 238 thru 242) identifies any visible defects in the ductwork, piping, enclosures, or connections to covers, or if an instrument reading of 500 ppm by volume or greater above background is measured, or if any enclosure openings are not maintained at negative pressure.

A. A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
B. The repair or corrective action shall be completed no later than 15 days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the permittee determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from the delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

244. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.454(b), the permittee shall prepare and maintain a site-specific inspection plan for each applicable enclosure opening and closed-vent system including drawings or schematics of the components of the affected equipment. The following information shall be recorded for each inspection.

A. Date of inspection;
B. The equipment type and identification;
C. Results of the negative pressure tests for enclosures;
D. Results of leak detection tests;
E. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);
F. The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
G. Repair methods applied in each attempt to repair the defect or leak;

H. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
I. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
J. The date of successful repair of the defect or leak;
K. The position and duration of opening of bypass line valves and the condition of any valve seals; and
L. The duration of the use of bypass valves on computer controlled valves.

Condensate Collection System Source Group

Source Description

The pulping condensates from some, but not necessarily all, of the following equipment will be collected in hard piping system and routed to the Aerated Stabilization Basin (ASB, source SN-16) for biological treatment.

1. Evaporator Hot Well
2. Evaporator Surface Condenser
3. Turpentine Decanter Underflow
4. Turpentine Storage Underflow
5. Blow Tank Condenser Condensate
6. NCG Drains

Specific Conditions

245. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.446(b) and (c)(3), the permittee shall collect some, but not necessarily all, of the pulping condensate streams from the following equipment in a hard piping system in order to achieve a total HAP (as methanol) mass collected of 7.2 lb/ODTP. (The averaging period for demonstrating compliance with the total HAP mass collected requirement shall be demonstrated to the Department's satisfaction prior to the effective date of the subpart.)

    A. Evaporator Hot Well
    B. Evaporator Surface Condenser
    C. Turpentine Decanter Underflow
    D. Turpentine Storage Underflow
    E. Blow Tank Condenser Condensate
    F. NCG Drains

246. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.446(d)(1), the collected pulping process condensates shall be conveyed in a closed collection system that is designed and operated to meet the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR of this part, except closed vent systems and control devices shall be designed and operated in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR §63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(3)(ii)(B)(5)(iii). The closed collection system will meet the specified requirements by being a hard-piped individual drain system per 40 CFR §63.962(a)(2). The Main Foul Condensate Collection Tank and Turpentine Decanter Underflow Collection Tank will be equipped with a water seal per 40 CFR §63.962(b)(2)(i)(A).

247. Pursuant to §19.304 of Regulation 19 and 40 CFR Part §63.446(d)(2), the permittee shall design and operate the Main Foul Condensate Collection Tank and the Turpentine Foul Condensate Collection Tank per the following requirements.

    A. The fixed roof and all openings shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm above background, vented into the LVHC Collection System, and routed to either the Lime Kiln (SN-03), the NCG Incinerator (SN-12), or the NCG Back-Up Flare (SN-14) for incineration.
    B. Each opening shall be maintained in a closed, sealed position at all times when the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.

248. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(a) and (i), the permittee shall install, calibrate, certify, operate, and maintain (according to manufacturer's specifications) a continuous monitoring system (CMS) on the Main Foul Condensate Collection Tank to measure the appropriate parameters that shall be submitted to the Department prior to the initial performance test.

249. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(k)(3), the permittee shall perform initial and subsequent annual tests to demonstrate that no detectable leaks are present in each condensate tank of the closed collection system. The tests shall be conducted using the procedure outlined in 40 CFR Part 63.457(d).

250. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(l)(1), the permittee shall conduct a visual inspection of each condensate closed collection system at least every 30 days. The visual inspections shall verify that appropriate liquid levels in the water seals in the Main Foul Condensate Collection Tank and Turpentine Foul Condensate Collection Tank are being maintained and identify any other defects that could reduce water seal control effectiveness. In addition, the permittee shall visually inspect the unburied portion of the collection system piping to verify that no defects are present.

251. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(l)(2), the Main Foul Condensate Collection Tank and the Turpentine Foul Condensate Collection Tank collection system shall be operated with no detectable leaks as specified in §63.446 (d)(2)(i) (see Specific Condition 246) measured initially and annually by the procedures specified in §63.457(d).

252. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(l)(3), if an inspection required by 40 CFR §63.453(l)(1) (see Specific Condition 250) identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, the first efforts at repair of the defect will be no later than 5 calendar days after detection and repair will be completed as soon as possible but no later than 15 calendar days after detection unless the repair of the defect requires emptying or temporary removal from service of the collection system. The defect will be repaired the next time the process generating the wastewater stops operation. The repair of the defect will be completed before the process resumes operation.

253. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(n), the permittee shall submit the following information to the Department prior to the initial compliance testing in order to demonstrate compliance with the condensate collection requirements.

    A. The methodology to be used,
    B. The parameters to be monitored, and
    C. The rationale for using those parameters.

254. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(n), the permittee shall submit the results of the initial performance tests, along with an analysis identifying acceptable parameter ranges for the parameters required to be monitored to the Department upon completion of the required performance tests.

255. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.453(o), the permittee shall submit to the Department the methodology to be used to assess periods of excess emissions from the condensate collection system if the monitored parameters are out-of-range. Instances where emissions are in excess of the appropriate standard, but are caused by events identified in the mill's startup, shutdown, and malfunction plan (required by 40 CFR Part 63.6) will not be considered in the calculation of periods of excess emissions.

256. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.454, the permittee shall prepare and maintain a site-specific inspection plan for each applicable closed collection system including drawings or schematics of the components of the affected equipment. The following information shall be recorded for each inspection.

    A. Date of inspection;
    B. The equipment type and identification;
    C. Results of the negative pressure tests for enclosures;
    D. Results of leak detection tests;
    E. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);

F. The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
G. Repair methods applied in each attempt to repair the defect or leak;
H The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
I. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
J. The date of successful repair of the defect or leak;
K. The position and duration of opening of bypass line valves and the condition of any valve seals; and
L. The duration of the use of bypass valves on computer controlled valves.

SECTION V: COMPLIANCE PLAN AND SCHEDULE

International Paper Company is in compliance with the applicable regulations cited in the permit application. International Paper Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: INSIGNIFICANT ACTIVITIES

Pursuant to §26.3(d) of Regulation 26, the following sources are insignificant activities. Insignificant and trivial activities will be allowable after approval and federal register notice publication of a final list as part of the operating air permit program. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §3(d) of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated August 23, 1996.

Mill Area	Description	Reason
Woodyard	Mobile Hydraulic Tank	Group A, #3
Woodyard	Lube Oil Storage Tank	Group A, #3
Pulp Mill	2 Oil Storage Tanks	Group A, #3
Pulp Mill	2 Hydrogen Chloride Tanks	Group A, #13
Paper Mill	Caustic Soda Tank	Group A, #4
Paper Mill	Paper Mill Bulk Lube Oil Storage Tank	Group A, #3
Paper Mill	3 Paper Machine Lube Oil Tanks	Group A, #3
Black Liquor Recovery Area	2 Diesel Fuel Tanks	Group A, #3
Black Liquor Recovery Area	Used Oil Tank	Group A, #3
Power Generation	3 Caustic Tanks	Group A, #4
Power Generation	Bark Boiler Reservoir	Group A, #3
Power Generation	Lube Oil Reservoir	Group A, #3
Causticizing Area	Caustic Storage Tank	Group A, #4
Causticizing Area	Caustic Soda Day Tank	Group A, #4
Causticizing Area	Quaker “3540" Flocculant Tank	Group A, #3
Causticizing Area	Caustic Plant Laboratory Plant	Group A, #5
Causticizing Area	OTE-25 Oil Tank	Group A, #3
Causticizing Area	600-W Oil Tank	Group A, #3

Mill Area	Description	Reason
Causticizing Area	630 Oil Tank	Group A, #3
Water Supply System	Caustic Soda Tank	Group A, #4
Mill Ancillary Services	4 Diesel Fuel Storage Tanks in the Clarifiers Area	Group A, #2
Mill Ancillary Services	2 Fuel Oil Storage Tanks	Group A, #2
Mill Ancillary Services	Diesel Fuel Storage Tank in the Causticizing Area	Group A, #2
Mill Ancillary Services	Lubrication Oil Storage Tank	Group A, #2
Mill Ancillary Services	Lubricating Oil and Hydraulic Fluid Storage	Group A, #2

Pursuant to §26.3(d) of Regulation 26, the following emission units, operations, or activities have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

1. Combustion emissions from propulsion of mobile sources and emissions from refueling these sources unless regulated by Title II and required to obtain a permit under Title V of the federal Clean Air Act, as amended. This does not include emissions from any transportable units, such as temporary compressors or boilers. This does not include emissions from loading racks or fueling operations covered under any applicable federal requirements.

2. Air conditioning and heating units used for comfort that do not have applicable requirements under Title VI of the Act.

3. Ventilating units used for human comfort that do not exhaust air pollutants into the ambient air from any manufacturing/industrial or commercial process.

4. Non-commercial food preparation or food preparation at restaurants, cafeterias, or caterers, etc.

5. Consumer use of office equipment and products, not including commercial printers or business primarily involved in photographic reproduction.

6. Janitorial services and consumer use of janitorial products.

7. Internal combustion engines used for landscaping purposes.

8. Laundry activities, except for dry-cleaning and steam boilers.

9. Bathroom/toilet emissions.

10. Emergency (backup) electrical generators at residential locations.

11. Tobacco smoking rooms and areas.

12. Blacksmith forges.

13. Maintenance of grounds or buildings, including: lawn care, weed control, pest control, and water washing activities.

14. Repair, up-keep, maintenance, or construction activities not related to the sources' primary business activity, and not otherwise triggering a permit modification. This may include, but is not limited to such activities as general repairs, cleaning, painting, welding, woodworking, plumbing, re-tarring roofs, installing insulation, paved/paving parking lots, miscellaneous solvent use, application of refractory, or insulation, brazing, soldering, the use of adhesives, grinding, and cutting.[1]

15. Surface-coating equipment during miscellaneous maintenance and construction activities. This activity specifically does not include any facility whose primary business activity is surface-coating or includes surface-coating or products.

16. Portable electrical generators that can be "moved by hand" from one location to another.[2]

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[1] Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit.

[2] "Moved by hand" means that it can be moved by one person without assistance of any motorized or non-motorized vehicle, conveyance, or device.

17. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning, or machining wood, metal, or plastic.

18. Brazing or soldering equipment related to manufacturing activities that do not result in emission of HAPs.[3]

19. Air compressors and pneumatically operated equipment, including hand tools.

20. Batteries and battery charging stations, except at battery manufacturing plants.

21. Storage tanks, vessels, and containers holding or storing liquid substances that do not contain any VOCs or HAPs.[4]

22. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and no volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

23. Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and non-volatile aqueous salt solutions, provided appropriate lids and covers are used and appropriate odor control is achieved.

24. Drop hammers or presses for forging or metalworking.

25. Equipment used exclusively to slaughter animals, but not including other equipment at slaughter-houses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment.

26. Vents from continuous emissions monitors and other analyzers.

27. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.

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[3] Brazing, soldering, and welding equipment, and cutting torches related to manufacturing and construction activities that emit HAP metals are more appropriate for treatment as insignificant activities based on size or production thresholds. Brazing, soldering, and welding equipment, and cutting torches related directly to plant maintenance and upkeep and repair or maintenance shop activities that emit HAP metals are treated as trivial and listed separately in this appendix.

[4] Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids are based on size and limits including storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.

28. Hand-held applicator equipment for hot melt adhesives with no VOCs in the adhesive.

29. Lasers used only on metals and other materials which do not emit HAPs in the process.

30. Consumer use of paper trimmers/binders.

31. Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substances being processed in the ovens or autoclaves or the boilers delivering the steam.

32. Salt baths using non-volatile salts that do not result in emissions of any air pollutant covered by this regulation.

33. Laser trimmers using dust collection to prevent fugitive emissions.

34. Bench-scale laboratory equipment used for physical or chemical analysis not including lab fume hoods or vents.

35. Routine calibration and maintenance of laboratory equipment or other analytical instruments.

36. Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis.

37. Hydraulic and hydrostatic testing equipment.

38. Environmental chambers not using hazardous air pollutant gases.

39. Shock chambers, humidity chambers, and solar simulators.

40. Fugitive emissions related to movement of passenger vehicles, provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.

41. Process water filtration systems and demineralizers.

42. Demineralized water tanks and demineralizer vents.

43. Boiler water treatment operations, not including cooling towers.

44. Emissions from storage or use of water treatment chemicals, except for hazardous air pollutants or pollutants listed under regulations promulgated pursuant to Section 112(r) of the Act, for use in cooling towers, drinking water systems, and boiler water/feed systems.

45. Oxygen scavenging (de-aeration) of water.

46. Ozone generators.

47. Fire suppression systems.

48. Emergency road flares.

49. Steam vents and safety relief valves.

50. Steam leaks.

51. Steam cleaning operations.

52. Steam and microwave sterilizers.

53. Site assessment work to characterize waste disposal or remediation sites.

54. Miscellaneous additions or upgrades of instrumentation.

55. Emissions from combustion controllers or combustion shutoff devices but not combustion units itself.

56. Use of products for the purpose of maintaining motor vehicles operated by the facility, not including air cleaning units of such vehicles (i.e. antifreeze, fuel additives).

57. Stacks or vents to prevent escape of sanitary sewer gases through the plumbing traps.

58. Emissions from equipment lubricating systems (i.e. oil mist), not including storage tanks, unless otherwise exempt.

59. Residential wood heaters, cookstoves, or fireplaces.

60. Barbecue equipment or outdoor fireplaces used in connection with any residence or recreation.

61. Log wetting areas and log flumes.

62. Periodic use of pressurized air for cleanup.

63. Solid waste dumpsters.

64. Emissions of wet lime from lime mud tanks, lime mud washers, lime mud piles, lime mud filter and filtrate tanks, and lime mud slurry tanks.

65. Natural gas odoring activities unless the Department determines that emissions constitute air pollution.

66. Emissions from engine crankcase vents.

67. Storage tanks used for the temporary containment of materials resulting from an emergency reporting to an unanticipated release.

68. Equipment used exclusively to mill or grind coatings in roll grinding rebuilding, and molding compounds where all materials charged are in paste form.

69. Mixers, blenders, roll mills, or calendars for rubber or plastic for which no materials in powder form are added and in which no organic solvents, diluents, or thinners are used.

70. The storage , handling, and handling equipment for bark and wood residues not subject to fugitive dispersion offsite (this applies to the equipment only).

71. Maintenance dredging of pulp and paper mill surface impoundments and ditches containing cellulosic and cellulosic derived biosolids and inorganic materials such as lime, ash, or sand.

72. Tall oil soap storage, skimming, and loading.

73. Water heaters used strictly for domestic (non-process) purposes.

74. Facility roads and parking areas, unless necessary to control offsite fugitive emissions.

75. Agricultural operations, including onsite grain storage, not including IC engines or grain elevators.

76. The following natural gas and oil exploration production site equipment: separators, dehydration units, natural gas fired compressors, and pumping units. This does not include compressors located on natural gas transmission pipelines.

SECTION VII: PLANTWIDE CONDITIONS

1. Pursuant to §19.704 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.

2. Pursuant to §19.410(B) of Regulation 19, and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.

3. Pursuant to §19.702(E) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:

   (1) Sampling ports adequate for applicable test methods
   (2) Safe sampling platforms
   (3) Safe access to sampling platforms
   (4) Utilities for sampling and testing equipment

4. Pursuant to Regulation 19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.

5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.

6. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the sulfur content of the #6 fuel oil shall not exceed 3.0% by weight.

7. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall either obtain a manufacturer's certification of the sulfur content of the fuel oil or test each shipment of fuel oil received for the sulfur content. The manufacturer's certification or the test results shall be kept on site and shall be made available to Department personnel upon request.

8. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, natural gas usage at this facility shall not exceed 9.857 billion standard cubic feet of natural gas in any consecutive twelve month period. This includes the amount of natural gas that may be fired at the package boiler, source SN-47.

9. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records in order to demonstrate compliance with Plantwide Condition 8 and which may be used by the Department for enforcement purposes. These records shall include the amount of natural gas used at each natural gas burning source, shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

10. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-204 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not produce in excess of 324,850 air dried tons of pulp in any consecutive twelve month period.

11. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of air dried pulp produced in order to demonstrate compliance with Plantwide Condition 10 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

12. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not process more than 73,000 tons of lime in any consecutive twelve month period.

13. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of lime processed in order to demonstrate compliance with Plantwide Condition 12 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

14. International Paper Company is subject to the provisions of 40 CFR Part 63, Subpart A - *General Provisions* and 40 CFR Part 63, Subpart S - *National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry*. A copy of this subpart has been included in Appendix F of this permit. International Paper Company is required to comply with all applicable provisions of this subpart within the time frames specified. This includes notifications to the Department of applicability and options which have been chosen to demonstrate compliance with this regulation. General requirements for the entire facility are listed, but not limited to the items found, in Plantwide Conditions 16 through 19.

15. Pursuant to §19.304 of Regulationo 19 and 40 CFR 63.6(i)(4)(i)(A), the permittee has received an extension to the initial compliance date for parts of 40 CFR Part 63, Subpart S. The extension request applied to the installation of controls for the LVHC gas collection and treatment and condensate collection and treatment standards, codified in 40 CFR §63.443 and §63.446, respectively, and to the corresponding testing and monitoring requirements for these standards. As a condition of this extension, ADEQ will require International Paper Company to submit a final compliance plan within 60 days of EPA finalizing its decision on possible changes to the Cluster Rule but no later than April 15, 2001. This plan must contain all the elements required by law and a schedule for implementation.

16. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63.6, the permittee shall develop a startup, shutdown, and malfunction (SSM) plan containing operation and maintenance requirements. This plan shall be maintained on site, provided to Department personnel upon request, and submitted to the Department upon completion.

17. Pursuant to 40 CFR 63.9, the permittee shall comply with all notification requirements including initial notifications, notification of performance tests, continuous monitoring system performance evaluations, and source compliance status.

18. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63.10, the permittee shall maintain the following records in order to demonstrate compliance with the applicable provisions of 40 CFR Part 63, Subpart S. These records shall be maintained on site and provided to Department personnel upon request.

    A. Startup, Shutdown, Malfunction, and Maintenance Records
    B. Continuous Monitoring System Records

19. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63.10, the permittee shall submit the following reports on a semi-annual basis to the Department in order to demonstrate compliance with the applicable provisions of 40 CFR Part 63, Subpart S.

    A. Excess Emission Reports
    B. Monitoring System Performance Reports
    C. Startup, Shutdown, and Malfunction Reports

20. Pursuant to §18.801 of Regulation 18, the permittee shall not cause or permit the emission of air contaminants, including odors or water vapor and including an air contaminant whose emission is not otherwise prohibited by Regulation #18, if the emission of the air contaminant constitutes air pollution within the meaning of A.C.A. §8-4-303.

21. Pursuant to §18.901 of Regulation 18, the permittee shall not conduct operations in such a manner as to unnecessarily cause air contaminants and other pollutants from becoming airborne.

22. Pursuant to §19.601 of Regulation 19, the Department may forego enforcement action for exceedances of federally regulated air pollutant emissions given that the person responsible for the source of the excess emissions does the following. The reporting of upset conditions is outlined in General Provision 8.

    A. Demonstrates to the Department that the emissions resulted from:

        1. Equipment malfunction or upset and are not the result of negligence or improper maintenance; or

        2. Physical constraints on the ability of a source to comply with the emission standard, limitation, or rate during startup or shutdown; and

        3. That all reasonable measures have been taken to immediately minimize or eliminate the excess emissions.

23. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the criteria pollutant and the PM emission rates listed in this permit were developed using estimates or published emission factors. A change in the published emission factors or development of other emissions data (including site specific test data) which could affect the estimated emission rates shall not be considered a violation of the permit limits. This condition does not apply to pollutants for which test data is already available, pollutants with an NSPS or NESHAP standard, or limits which have been set through a PSD permitting action (those pollutants which have undergone a BACT analysis or which "netted out" of a PSD review).

24. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee may maintain hand written records for those sources which do not have electronic data keeping systems. The permittee may maintain hand written records for those sources which have electronic record keeping systems with a data storage of one year for a period to not exceed one year from the date of permit issuance. The data storage shall be increased to five years for those sources during that period. Any records shall be made available to Department personnel upon request.

25. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the following combined emission rates at sources SN-01, SN-04/05, and SN-06 when burning #6 fuel oil. Compliance with these emission rates will be demonstrated through the fuel oil usage limit and proper operation of control equipment.

Pollutant	tpy
PM_{10}	1.1
SO_2	28.4
VOC	1.3
CO	6.9
NO_X	4.6
Pb	0.04

26. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permitteee shall not exceed the following combined emission rates at sources SN-01, SN-04/05, and SN-06 when firing #6 fuel oil. Compliance with these emission rates will be demonstrated through the fuel oil usage limits and proper operation of the control equipment.

Pollutant	tpy
PM	1.4
Antimony Compounds	0.003
Arsenic Compounds	0.003
Beryllium Compounds	0.003
Cadmium Compounds	0.003
Chromium Compounds	0.003
Cobalt Compounds	0.003
Formaldehyde	0.03
Hydrogen Chloride*	0.08
Hydrogen Fluoride*	0.03
Lead Compounds	0.003
Manganese Compounds	0.003
Mercury Compounds	0.003
Nickel Compounds	0.008
POM	0.03
Selenium Compounds	0.003

*Non-VOC, non-PM non-criteria pollutant.

27. Pursuant to §19.705 of Regulation 19, 40 CFR 70.6, and/or A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and §18.1004 of Regulation 18, the permittee shall not fire in excess of a total of 120,000 gallons of #6 fuel oil in any consecutive twelve month period at sources SN-01, SN-04/05, and SN-06.

28. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, or §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the amount of #6 fuel oil fired at sources SN-01, SN-04/05, and SN-06 in order to demonstrate compliance with Plantwide Condition 27 and which may be used by the Department for enforcement purposes. These records shall be updated no later than the last day of the month following the month which the records represent, shall be kept on site, and shall be made available to Department personnel upon request. An annual total and each month's individual data shall be submitted to the Department in accordance with General Provision 7.

29. Pursuant to §19.304 of Regulation 19 and 40 CFR §63.441(d), the permittee shall be in compliance with the requirements of 40 CFR Part 63, Subpart S listed in this permit no later than April 16, 2001, except as outlined in paragraphs (d)(1) through (d)(3) of this section. The permittee is not required to be in compliance with 40 CFR Part 63, Subpart S upon issuance of this permit. (Paragraphs (d)(1) through (d)(3) may be found in the copy of Subpart S in Appendix F of this permit.)

Permit Shield.

30. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:

    A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated August 23, 1996.

Source No.	Regulation	Description
Facility	19	SIP
Facility	26	Arkansas Title V regulations
Facility	40 CFR Part 63, Subpart S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
13	40 CFR Part 60, Subpart GG	Standards of Performance for Stationary Gas Turbines
12, 14, and 27	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
47	40 CFR Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
47	40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated August 23, 1996.

Description of Regulation	Regulatory Citation	Affected Source	Basis for Determination
NESHAP Subpart for Halogenated Solvent Cleaning	40 CFR Part 63, Subpart T	Facility	This facility does not use halogenated solvents in the parts cleaning operations.
Relaxed Compliance Orders	40 CFR Part 65	Facility	This part includes specific EPA orders allowing designated sources to delay compliance with an otherwise applicable SIP requirement until a specific date. This facility is not included among the Arkansas sources listed in this part.
Assessment and Collection of Noncompliance Penalties by EPA	40 CFR Part 66	Facility	This part imposes requirements only on sources of air pollution which have received notices of noncompliance. This facility has received no such notices.
EPA Approval of State Noncompliance Penalty Programs	40 CFR Part 67	Facility	This part does not impose requirements of sources.
Acid Rain Program	40 CFR Parts 72 -78	Facility	This facility is not currently subject to any acid rain requirements.

C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

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

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

Title VI Provisions

31. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:

A. All containers containing a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a

class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.

B. The placement of the required warning statement must comply with the requirements pursuant to §82.108.

C. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.

D. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.

32. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:

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

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

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

D. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like appliance" as defined at §82.152.)

E. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.

F. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

33. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

34. 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.

    The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or systems used on passenger busses using HCFC-22 refrigerant.

35. 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.

SECTION VII: GENERAL PROVISIONS

1. Pursuant to 40 C.F.R. 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.

2. Pursuant to 40 C.F.R. 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.

3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.

4. Pursuant to 40 C.F.R. 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.

5. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:

   a. The date, place as defined in this permit, and time of sampling or measurements;
   b. The date(s) analyses were performed;
   c. The company or entity that performed the analyses;
   d. The analytical techniques or methods used;
   e. The results of such analyses; and
   f. The operating conditions existing at the time of sampling or measurement.

6. Pursuant to 40 C.F.R. 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained 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 this permit.

7. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

   Arkansas Department of Environmental Quality
   Air Division
   ATTN: Compliance Inspector Supervisor
   Post Office Box 8913
   Little Rock, AR 72219-8913

8. Pursuant to 40 C.F.R. 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and §19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after discovery of the occurrence. The initial report may be made by telephone and shall include:

   a. The facility name and location,
   b. The process unit or emission source which is deviating from the permit limit,
   c. The permit limit, including the identification of pollutants, from which deviation occurs,
   d. The date and time the deviation started,
   e. The duration of the deviation,
   f. The average emissions during the deviation,
   g. The probable cause of such deviations,
   h. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
   i. The name of the person submitting the report.

   A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by the initial report a schedule of actions to be taken to eliminate future occurrences and/or

to minimize the amount by which the permit's limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 C.F.R. 70.6(a)(5), §26.7 of Regulation #26, and A.C.A. §8-4-203 as referenced by A.C.A. §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.

10. Pursuant to 40 C.F.R. 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq*.)and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

11. Pursuant to 40 C.F.R. 70.6(a)(6)(ii) and §26.7 of Regulation #26, it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

12. Pursuant to 40 C.F.R. 70.6(a)(6)(iii) and §26.7 of Regulation #26, this 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.

13. Pursuant to 40 C.F.R. 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.

14. Pursuant to 40 C.F.R. 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the

permit. Upon request, the permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 C.F.R. 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.

16. Pursuant to 40 C.F.R. 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.

17. Pursuant to 40 C.F.R. 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.

18. Pursuant to 40 C.F.R. 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

19. Pursuant to 40 C.F.R. 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.

20. Pursuant to 40 C.F.R. 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:

    a. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
d. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

21. Pursuant to 40 C.F.R. 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. The first report shall be due 30 days following the one-year anniversary of the issuance of this permit. All compliance certifications required by this permit shall include the following:

a. The identification of each term or condition of the permit that is the basis of the certification;
b. The compliance status;
c. Whether compliance was continuous or intermittent;
d. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
e. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.

22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:

a. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
b. The liability the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
c. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
d. The ability of EPA to obtain information from a source pursuant to §114 of the Act.

23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.