

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0287-AOP-R25 AFIN: 41-00002

1. PERMITTING AUTHORITY:

Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Domtar A.W. LLC - Ashdown Mill  
285 Highway 71 South  
Ashdown, Arkansas 71822

3. PERMIT WRITER:

Shawn Hutchings

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Paper (except Newsprint) Mills  
NAICS Code: 322121

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
1/21/2025	Modification	None. Compliance provision changes only for existing sources.

6. REVIEWER'S NOTES:

Domtar A.W. LLC. –Ashdown Mill (AFIN: 41-00002) operates a paper mill located at 285 Highway 71 South in Ashdown, Arkansas 71822. This permit was a modification which extended TRS testing in Specific Conditions 91 and 141 to every 60 months from one year and revised testing opacity readings for the rice engines for annual observations for diesel engines only. Throughput limits for SN-45 were removed. These limits were identical to the throughput for SN-42 and the sources are in a series. Cross references for which conditions show compliance with the emission limits for SN-45 were updated to reference the throughput requirements for SN-42. Specific Conditions 64, 65, and 66, the CAM conditions for SN-05,

were removed. The facility demonstrated the source is not subject to CAM. Testing conditions in 175 and 176 were removed as they are no longer necessary.

There were no changes to permitted emission rates.

The permittee had asked for additional changes which were not included in the draft permit. First, Domtar asked to remove Specific Condition 200a and b and 213a and b. These were throughput limits for SN-41 and 45. These limits were directly relied on for a number of pollutants and are therefore necessary. However, sources SN-42 and 45 are in a series recording the same number at both was not necessary. The limit on SN-45 was removed and where compliance limits for that source was shown by the removed Specific Condition 213a it was changed to 200a.

The testing in Specific Conditions 91 and 141 was requested to be every 61 months. CAR 41.704 requires testing no more than every 5 years. Therefore the testing was set at 60 months.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

There are no pending DEQ enforcement actions and no actions noted on ECHO (<https://echo.epa.gov/>).

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? N  
If yes, were GHG emission increases significant? N

b) Is the facility categorized as a major source for PSD? Y

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD. No physical change or change in method of operation.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
Facility	40 CFR Part 60, Subpart A	General Provisions
Facility	40 CFR §52.21	Prevention of Significant Deterioration
Facility	40 CFR 52, Subpart E	Prevention of Significant Deterioration

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
01	40 CFR Part 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
02	40 CFR Part 60, Subpart BB	Standards of performance for Kraft Pulp Mills
02	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills
05	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
05	40 CFR Part 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced after August 17, 1971
06	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
06	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills
08	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
08	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills
09	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
09	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills
14	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
14	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
		Sources at Kraft, Soda, Sulfite and Stand-Alone Semicheical Pulp Mills
15	40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills
15	40 CFR Part 63, Subpart MM	NESHAPS for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semicheical Pulp Mills
23	40 CFR Part 60, Subpart Kb	NSPS Standards of Performance for Volatile Organic Liquid Storage Vessels (including petroleum Liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984
16, 17, 18, 46	40 CFR 63, Subpart S	NESHAPS from the pulp and paper industry
01, 03, and 05	40 CFR 63, Subpart DDDDD	NESHAPS for major sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
50, 53, 54a, 54b, 57, 58, 59	40 CFR Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
58 and 59	40 CFR Part 60, Subpart IIII	Standards of Performance for stationary compression ignition internal combustion engines

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
None				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any 8 CAR pt. 40 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? Y  
If not, explain why.

For any requested inapplicable regulation in the permit shield, explain the reason why it is not applicable in the table below.

Source	Inapplicable Regulation	Reason
Shield lists only applicable requirements.		

12. COMPLIANCE ASSURANCE MONITORING (CAM) – TITLE V PERMITS ONLY:

List sources potentially subject to CAM because they use a control device to achieve compliance and have pre-control emissions of at least 100 percent of the major source level. List the pollutant of concern and a brief summary of the CAM plan (temperature monitoring, CEMs, opacity monitoring, etc.) and frequency requirements of § 64.

Source	Pollutant Controlled	Cite Exemption or CAM Plan Monitoring and Frequency
01	PM/PM <sub>10</sub>	Opacity (COMS)
05	PM/PM <sub>10</sub> and SO <sub>2</sub>	Boiler MACT exempts Particulate. CEMS exempts SO <sub>2</sub> .
02	PM/PM <sub>10</sub>	Exempt, MACT MM
06	PM/PM <sub>10</sub>	Exempt, MACT MM
08	PM/PM <sub>10</sub> , SO <sub>2</sub> , TRS	Exempt, MACT MM and NSPS BB
09	PM/PM <sub>10</sub> and SO <sub>2</sub>	Exempt, MACT MM
14	PM/PM <sub>10</sub>	Exempt, MACT MM
15	PM/PM <sub>10</sub> , SO <sub>2</sub> , TRS	Exempt, MACT MM and NSPS BB
16. 17. 18	Cl <sub>2</sub> and ClO <sub>2</sub>	Exempt, MACT S
20	Cl <sub>2</sub> and ClO <sub>2</sub>	Exempt, Not subject to an applicable “emission limitation or standard” as defined by rule.

13. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

14. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

Based on Division of Environmental Quality procedures for review of non-criteria pollutants, emissions of non-criteria pollutants are below thresholds of concern.

c) H<sub>2</sub>S Modeling:

A.C.A. §8-3-103 requires hydrogen sulfide emissions to meet specific ambient standards. Many sources are exempt from this regulation, refer to the Arkansas Code for details.

Is the facility exempt from the H<sub>2</sub>S Standards Y  
 If exempt, explain: The facility is subject to and complies with 40 CFR Part 60, Subpart BB and is exempt pursuant to A.C.A. § 8-3-103-(d)(2)(B)(ii).

15. CALCULATIONS:

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Source SN-01 No. 3 Power Boiler (NCASI Factors include a 20% safety factor)					
PM/PM <sub>10</sub>	NSPS and PSD	0.025 lb/MMBtu	ESP	98	Controlled Lb/hr based on 790 MMBtu/hr
SO <sub>2</sub>	PSD BACT	0.1 lb/MMBtu (NSPS Limit)	N/A	-	PSD limit applied to unit with 620 MMBtu/hr of bark feed and 170 MMBtu/hr natural gas. (Permit 946-A)

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
VOC	PSD BACT	0.027 lb/MMBtu	N/A		PSD limit applied to unit with 790 MMBtu/hr of bark feed and natural gas
CO	PSD BACT	0.35 lb/MMBtu	N/A		PSD limit applied to unit with 790 MMBtu/hr of a combination of bark feed and natural gas
NO <sub>x</sub>	PSD and NSPS Db	0.3 lb/MMBtu	N/A		PSD limit applied to unit with 790 MMBtu/hr of a combination of bark feed and natural gas
Lead	NCASI	5.20E-06 lb/MMBtu	ESP	N/A	790 MMBtu/hr Heat Input Design Capacity
Acetaldehyde	NCASI	2.80E-04 lb/MMBtu	N/A		
Acrolein	NCASI	2.60E-04 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Benzene	NCASI	3.30E-03 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Formaldehyde	NCASI	1.30E-03 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Hydrogen Chloride	Boiler MACT	2.20E-02 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Hexane	NCASI	1.8 lb/MMscf	N/A		790 MMBtu/hr Heat Input Design Capacity
Naphthalene	NCASI	6.10E-04 lb/MMscf	N/A		
Phenol	NCASI	1.60E-04 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Toluene	NCASI	2.90E-05 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity, No SF
Antimony	NCASI	4.20E-07 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Arsenic	NCASI	1.90E-06 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Beryllium	NCASI	4.00E-07 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Cadmium	NCASI	1.10E-03 lb/MMscf	N/A		790 MMBtu/hr Heat Input Design Capacity
Chromium VI	NCASI	4.90E-07 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Chromium	NCASI	2.40E-06 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Cobalt	NCASI	2.40E-06 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Manganese	NCASI	9.10E-05 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Mercury	Boiler MACT	5.76E-6 lb/MMBtu	N/A		
Nickel	NCASI	3.50E-06 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
Selenium	NCASI	3.30E-06 lb/MMBtu	N/A		790 MMBtu/hr Heat Input Design Capacity
SN-02 No. 3 Lime Kiln (NCASI Factors include a 20% safety factor)					
PM <sub>10</sub> /PM	NSPS BB	0.066 gr/dscf	ESP	98	Stack Test 8.6 lb PM <sub>10</sub> /hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
SO <sub>2</sub>	PSD	0.727 lb/Ton CaO (13.3 lb/hr)			PSD limit applied to unit with 440 tons per day of lime (Permit 946-A) $(0.727*440)/24=$ lb/hr tpy *8760
VOC	PSD	0.795 lb/ton of CaO			287-AR-7 cites AP-42, 4th Edition, current AP-42 does not have a factor. Calculation of lb/h and tpy same as SO <sub>2</sub> . The permit has as PSD limit but 946-A did not have in PSD. Picked up as a PSD cite in 287-AR-7.
CO	PSD	3.0 lb/ton CaO			PSD limit applied to unit with 440 tons per day of lime (Permit 946-A) $(3.0*440)/24=$ lb/hr tpy *8760
NO <sub>x</sub>	PSD	3.63 lb/ton CaO			PSD limit applied to unit with 440 tons per day of lime (Permit 946-A) $(3.63*440)/24=$ lb/hr tpy *8760
TRS	NSPS BB	8 ppm			1.34 lb/hr CEMS
Lead	NCASI	2.10E-05 lb/ton			
Acetaldehyde	NCASI	9.70E-03 lb/ton			
Benzene	Stack Test	0.24 lb/hr			
Formaldehyde	NCASI	9.40E-03 lb/ton CaO			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Methanol	NCASI	9.30E-02 lbs/ton			
Toluene	NCASI	8.30E-03 lb/ton CaO			
Antimony	NCASI	2.60E-06 lb/tons			
Arsenic	NCASI	1.20E-06 lb/tons			
Beryllium	NCASI	3.30E-06 lb/tons			
Cadmium	NCASI	1.30E-05 lb/tons			
Chromium	NCASI	4.00E-05 lb/tons			
Cobalt	NCASI	1.10E-05 lb/tons			
Manganese	NCASI	1.10E-04 lb/tons			
Mercury	NCASI	5.40E-06 lb/tons			
Nickel	NCASI	8.30E-05 lb/tons			
Selenium	NCASI	1.80E-06 lbs/tons			
Source SN-05 No. 2 Power Boiler (NCASI factors include a 20% safety factor)					
PM <sub>10</sub>	NSPS D	0.1 lb/MMBtu	Venturi Scrubber	98	820 MMBtu/hr Design Heat Input Capacity
SO <sub>2</sub>	NSPS D	1.2 lb/MMBtu	Venturi Scrubber	98	820 MMBtu/hr Design Heat Input Capacity
VOC	Stack Test	92 lb/hr			
CO	MACT	900 ppmvd			820 MMBtu/hr Design Heat Input Capacity
NO <sub>x</sub>	NSPS	0.7 lb/MMBtu			820 MMBtu/hr Design Heat Input Capacity

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Lead	NCASI	3.60E-05 lb/MMBtu			
Acetaldehyde	NCASI	2.80E-04 lb/MMBtu	N/A		
Acrolein	NCASI	2.60E-04 lb/MMBtu	N/A		820 MMBtu/hr Design Heat Input Capacity
Benzene	NCASI	3.3E-03 lb/MMBtu	N/A		820 MMBtu/hr Design Heat Input Capacity
HCl	Stack Test	5.75 lb/hr	N/A		
Hexane	NCASI	1.8 lb/MMscf	N/A		820 MMBtu/hr Design Heat Input Capacity
Naphthalene	Stack Test	0.50 lb/hr	N/A		
Phenol	NCASI	1.60E-04 lb/MMBtu	N/A		
Toluene	NCASI	2.9E-05 lb/MMBtu	N/A		
Antimony	NCASI	2.00E-06 lb/MMBtu	Venturi Scrubber	98	800 tons coal/day
Arsenic	NCASI	4.1E-04 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Beryllium	NCASI	2.1E-05 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Cadmium	NCASI	3.20E-06 lb/MMBtu	Venturi Scrubber	98	800 tons coal/day
Chromium VI	NCASI	6.1E-6 lb/MMBtu	Venturi Scrubber	98	820 MMBtu/hr Design Heat Input Capacity
Chromium	NCASI	2.6E-04 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Cobalt	NCASI	1.0E-04 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Manganese	NCASI	2.50E-04 lb/MMBtu	Venturi Scrubber	98	820 MMBtu/hr Design Heat Input Capacity
Mercury	MACT	5.76E-06 lb/MMBtu	Venturi Scrubber	98	800 tons coal/day

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Nickel	NCASI	2.8E-04 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Selenium	NCASI	1.3E-03 lb/ton coal	Venturi Scrubber	98	800 tons coal/day
Source SN-06 No. 2 Recovery Boiler (NCASI factors include a 20% safety factor)					
PM <sub>10</sub>	NSPS BB	0.044 gr/dscf	ESP	98	
SO <sub>2</sub>	PSD	286 lb/hr			PSD limit from 287-AR-3
VOC	Stack Test	46.7 lb/hr			
CO	PSD	980 lb/hr 16.8 lb/ADTP			
NO <sub>x</sub>	PSD	309.2 lb/hr 5.3 lb/ADTP			
Lead	NCASI	2.30E-05 lb/ton BLS			
Sulfuric Acid	NCASI	3.22 lb/hr			
Acetaldehyde	NCASI	6.1E-03 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Benzene	NCASI	5.0E-03 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Formaldehyde	NCASI	1.5E-02 lb/ton BLS			
Styrene	NCASI	8.80E-04 lb/ton BLS			
Antimony	NCASI	1.00E-06 lb/ton BLS			
Arsenic	NCASI	1.47E-06 lb/ton BLS			
Beryllium	NCASI	9.68E-07 lb/ton BLS			
Cadmium	NCASI	1.20E-05 lb/ton BLS			
Chromium	NCASI	4.49E-05 lb/ton BLS			
Chromium VI	NCASI	1.60E-05 lb/ton BLS			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Cobalt	NCASI	3.20E-06 lb/ton BLS			
Manganese	NCASI	9.98E-05 lb/ton BLS			
Mercury	NCASI	5.46E-06 lb/ton BLS			
Nickel	NCASI	7.92E-05 lb/ton BLS			
Selenium	NCASI	5.35E-06 lb/ton BLS			
Hydrogen Chloride	Stack Test	51.20 lb/hr			
Methanol	NCASI	0.045 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
TRS	NSPS BB	5 ppm			NSPS BB 5PPMV
Source SN-08 - No. 2 Smelt Dissolving Tank (NCASI factors have a 20% safety factor)					
PM <sub>10</sub> / PM	NSPS BB	0.2 lb/ton BLS	Scrubber	80	PM is a PSD limit from 287-AR-3 2160 tons BLS/day 788,400 tons BLS/yr
SO <sub>2</sub>	PSD	10.6 lb/hr	Scrubber	80	SO <sub>2</sub> is a PSD limit from 287-AR-3
VOC	NCASI	0.066 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Acetaldehyde	NCASI	1.6E-03 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Ammonia	NCASI	0.41E-03 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Formaldehyde	NCASI	3.5E-03 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Methanol	NCASI	0.087 lb/ton BLS			2160 tons BLS/day 788,400 tons BLS/yr
Beryllium	NCASI	2.50E-07 lb/ton BLS			
TRS	NSPS BB	0.033 lb/ton BLS	Scrubber	60	2160 tons BLS/day 788,400 tons BLS/yr
Source SN-09 No. 2 Lime Kiln (NCASI factors have a 20% safety factor)					
PM/PM <sub>10</sub>	Stack Test	51.0 lb/hr	Scrubber	85	PM is a PSD limit

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	NSPS MM	0.064 gr/dscf			
SO <sub>2</sub>	Permit 946A	0.727 lb/ton CaO			Based on BACT for Lime Kiln No. 3 18.33 tons CaO/hr 160571 tons CaO/yr
VOC	AP-42 , 4th edition, 1985	17.1 lb/hr			18.33 tons CaO/hr 160571 tons CaO/yr
CO	BACT	3.0 lb/ton CaO			Based on BACT for Lime Kiln No. 3
NO <sub>x</sub>	AP-42 , 4th edition, 1985	3.7411 lb/ton CaO			18.33 tons CaO/hr 160571 tons CaO/yr
Lead	NCASI	6.20E-03 lb/ton BLS			
Acetaldehyde	NCASI	9.70E-03 lb/ton CaO			18.33 tons CaO/hr 160571 tons CaO/yr
Benzene	Stack Test	0.23			
Methanol	NCASI	9.30E-02 lb/ton BLS			
Formaldehyde	NCASI	9.40E-03 lb/ton CaO			
Toluene	NCASI	8.3E-03 lb/ton CaO			
Antimony	NCASI	3.70E-06 lb/tons BLS			
Arsenic	NCASI	1.30E-05 lb/tons BLS			
Beryllium	NCASI	1.19E-06 lb/tons BLS			
Cadmium	NCASI	2.60E-05 lb/tons BLS			
Chromium	NCASI	2.70E-04 lb/tons BLS			
Cobalt	NCASI	1.00E-05 lb.tons BLS			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
Manganese	NCASI	1.70E-03 lb.tons BLS			
Mercury	NCASI	4.00E-06 lb.tons BLS			
Nickel	NCASI	3.10E-04 lb/tons BLS			
Selenium	NCASI	1.40E-05 lb.tons BLS			
TRS	NSPS BB	8.00 ppmvd @10% O <sub>2</sub>	Scrubber	25	CEMS
Source SN-14 No. 3 Recovery Boiler (NCASI factors have a 20% safety factor)					
PM <sub>10</sub> /PM	PSD NSPS	93.5 lb/hr 0.044 gr/dscf	ESP	98	controlled
SO <sub>2</sub>	PSD	425.0 lb/hr 250 PPM			287-AR had a PSD avoidance limit of the firing rate of BLS. CEMS can show compliance now. 1861.5 tpy
VOC	AP-42 , 4th edition, 1985	0.8 lb/ADTP			INCOMPLETE Calculations
CO	CEMS	856 lb/hr			
NO <sub>x</sub>	CEMS	270 lb/hr			PSD Limit
Acetaldehyde	NCASI	4.2E-04 lb/ton BLS			2,800 tons/day 1,022,000 tons/yr
Benzene	NCASI	6.4E-04 lb/ton BLS			2,800 tons/day 1,022,000 tons/yr
Formaldehyde	NCASI	6.6E-03 lb/ton BLS			2,800 tons/day 1,022,000 tons/yr
Hydrogen Chloride	Stack Test	54.50 lb/hr			
Methanol	NCASI	0.045 lb/ton BLS			2,800 tons/day 1,022,000 tons/yr
Styrene	NCASI	8.8E-04 lb/ton BLS			2,800 tons/day 1,022,000 tons/yr
Sulfuric Acid	Stack Test	4.20 lb/hr			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
TRS	CEMS	6.6 lb/hr			PSD Limit
Source SN-15 - No. 3 Smelt Dissolving Tank (NCASI factors have a 20% safety factor)					
PM <sub>10</sub> /PM	PSD NSPS BB	18.7 lb/hr 0.1 g/kg BLS	Scrubber	90	
SO <sub>2</sub>	PSD	5.1 lb/hr	Scrubber	10	
VOC	NCASI <sup>7</sup>	0.066 lb/ton BLS			2800 tons/day 1,022,000 tons/year
TRS	PSD NSPS BB	1.6 lb/hr 0.0168 g/kg BLS	Scrubber	25	
Acetaldehyde	NCASI	1.6E-04 lb/ton BLS			
Ammonia	NCASI	0.41 lb/ton BLS			
Formaldehyde	Stack Test	0.58 lb/hr			
Methanol	NCASI	0.087 lb/ton BLS			
Beryllium	NCASI	2.5E-07 lb/ton BLS			
Sources SN-16 – No. 1A Bleachplant Vents, SN-17 - No. 1B Bleachplant Vents and SN-18 - No. 2 Bleachplant Vents (NCASI factors have a 20% safety factor)					
VOC	Stack Test	32.0 lb/hr			Bubbled Sources
CO	Stack Test	240.4 lb/hr			
Acetaldehyde	NCASI	0.0037 lb/ADTUBP			3,407 ADTUBP/day 1,234,555 ADTUBP/yr
Chlorine	Stack Test	6.00 lb/hr	Scrubber	99	
Chlorine Dioxide	Stack Test	4.00 lb/hr	Scrubber	99	
Chloroform	Stack Test	16.50 lb/hr			
Formaldehyde	NCASI	4.2E-4 lb/ADTUBP			3,407 ADTUBP/day 1,234,555 ADTUBP/yr
HCl	NCASI	0.022 lb/ADTUBP			3,407 ADTUBP/day 1,234,555 ADTUBP/yr
Methanol	NCASI	0.16 lb/ADTUBP			3,407 ADTUBP/day

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					1,234,555 ADTUBP/yr
TRS	NCASI	0.016 lb/ADTUBP			3,407 ADTUBP/day 1,234,555 ADTUBP/yr
Source SN-20 - ERCO ClO2 Generator					
Chlorine	Stack Test	0.30 lb/hr			
Chlorine Dioxide	Stack Test	3.00 lb/hr			
Source SN-21 - Effluent Treatment Lagoons (NCASI factors have a 20% safety factor)					
VOC	NCASI	248.9 lb/hr			Sum of methanol, formaldehyde, and chloroform estimates 75 Mgal/day effluent
Chloroform	NCASI	5E-03 lb/ADTUBP			3,770 ADTUBP/day 1,376,050 ADTUBP/yr
Formaldehyde	NCASI	0.76 ppmw			3,770 ADTUBP/day 1,376,050 ADTUBP/yr
Methanol	NCASI	4.9 <sup>A</sup> 21.4 <sup>B</sup> 0.25 <sup>C</sup> 0.25 <sup>D</sup>			3,770 ADTUBP/day 1,376,050 ADTUBP/yr Contributions from sources: A: Bleach Plant [lb/ADTUBP] B: Condensates [lb/ADTUBP] C: Clarifier Effluent [ppmw] D: Clarifier Fugitive [ppmw]
Source SN-22 - No. 1A and 1B Brownstock Washers (NCASI factors have a 20% safety factor)					
VOC	stack test	1A 0.57 lb/ton pulp and No. 1B			59.2 lb/hr 259.3 tpy

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		.06173 lb/ton pulp			
Acetone	stack test	8.80 lb/hr			
Formaldehyde	stack test	0.2 lb/hr			
Methanol	stack test	59 lb/hr			
TRS	NCASI	0.23 lb/ADTUBP			1,152 ADTUBP/day 420,480 ADTUBP/yr
Source SN-23 - Storage Tank - Methanol Tank					
VOC	AP-42 Sec. 7.1.3.1	39.81 lb/hr			
Methanol	AP-42 Sec. 7.1.3.1	39.81 lb/hr			
SN-28 - Storage Tank					
VOC	AP-42 Sec. 7.1.3.1	6.62 lb/hr			
Formic Acid	AP-42 Sec. 7.1.3.1	6.62 lb/hr			
Source SN-29 - Recausticizer Vents (NCASI factors have a 20% safety factor)					
PM/PM <sub>10</sub>	NCASI	0.031 lb/ton CaO			1,152 tons CaO/day 420,500 tons CaO/yr
VOC	NCASI	3.62 lb/hr			Sum of acetaldehyde and methanol
Acetaldehyde	NCASI	2.1E-2 lb/ton CaO			Emission factor is from the previous permit. Permittee requested to keep existing emission limit of 0.51 lb/hr.
Ammonia	NCASI	0.46 lb/ton CaO			1,152 tons CaO/day 420,500 tons CaO/yr
Methanol	NCASI	0.054 lb/ton CaO			1,152 tons CaO/day 420,500 tons CaO/yr
Sources SN-30A, SN-30B, SN-30C, SN-30D, SN-30E and SN-30E – PCC Carbonators Lime Silos					

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
PM <sub>10</sub>	Stack test	4.8 lb/hr			
SO <sub>2</sub>	Stack test	2.4 lb/hr			
VOC	Stack test	12.6 lb/hr			
CO	Stack test	54.6 lb/hr			
NO <sub>x</sub>	Stack test	65.4 lb/hr			
TRS	Stack test	0.36 lb/hr			
Source SN-36 - Weak Black Liquor Tanks (Tanks #1 through #10)					
VOC	NCASI	0.713 lb/hr/tank			
Acetone	NCASI	0.016 lb/hr/tank			
Acetaldehyde	NCASI	0.0032 lb/hr/tank			
Methanol	NCASI	0.71 lb/hr/tank			
TRS (#1-#9)	Stack test	0.1 lb/hr			PSD limit
TRS (#10)	Stack test	0.0531			PSD limit
Source SN-37 - Pulp Dryer Hood and Vacuum Exhausts					
VOC	Stack test	4.7 lb/hr			R0 Application: production rate 37.5 tph finished pulp @7% moisture which is 34.875 tph bone dry pulp  900 air dried tons per day finished product Permitted 8,760 hours (328,500 ADTFP/yr)
Acetaldehyde	NCASI	0.033 lb/ADTFP			See comment for VOC. Permit limit includes 20% safety factor
Methanol	NCASI	0.071 lb/ADTFP			See comment for VOC. Permit limit includes 20% safety factor
Source SN-38 - No. 2 and No. 3 Wood Yards					

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
PM	AP-42 Section 13.2.4	5.6 lb/hr			Bark, Chips, Wind Erosion, and Jet Screen
PM <sub>10</sub>	AP-42 Section 13.2.4	4.14 lb/hr			Bark, Chips, Wind Erosion, and Jet Screen
VOC	NCASI	2.16 lb/hr			Assumes 50% moisture, 100% softwood PSD Limit
Source SN-39 – High Density Storage Tanks					
VOC	NCASI	0.151 lb/hr/tank			11 tanks Sum of acetaldehyde, chloroform, and methanol 20% SF
Acetaldehyde	NCASI	0.02 lb/hr/tank			11 tanks 20% SF
Chloroform	NCASI	0.011 lb/hr/tank			11 tanks 20% SF
Methanol	NCASI	0.12 lb/hr/tank			11 tanks 20% SF
TRS	NCASI	0.349 lb/hr/tank			11 tanks 20% SF
Acetone	NCASI	0.027 lb/hr/tank			11 tanks 20% SF
Source SN-40 - No. 1A and No. 1B Digester Chip Fill Exhausts					
VOC	Stack Test	2.09 lb/fill			Compliance demonstrated by limiting time between blows Sum of Methanol and Ethanol Max 4.8 fills/hr 2,304 ADTP/day 840,960 ADTP/yr
Methanol	Stack Test	5.75 lbs/hr			Compliance demonstrated by

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					limiting time between blows Max 4.8 fills/hr
TRS	NCASI	2.02 lb/hr			Compliance demonstrated by limiting time between blows Max 4.8 fills/hr 2,304 ADTP/day 840,960 ADTP/yr
Source SN-41 - Sludge Landfill					
PM	AP-42 Section 13.2.4	1.36E-3 lb/ton Sludge			344,000 yd <sup>3</sup> /yr 170 yd <sup>3</sup> /hr 947.7 lb/yd <sup>3</sup>
PM <sub>10</sub>	AP-42 Section 13.2.4	6.5E-4 lb/ton Sludge			344,000 yd <sup>3</sup> /yr 170 yd <sup>3</sup> /hr 947.7 lb/yd <sup>3</sup>
VOC (as NMOC)	LandGEM	63.15 lb/hr			
CO	LandGEM	4.8 lb/hr 1.8 tpy			
HAPS	LandGEM				See Permit For Emission Rates
Source SN-42 - No. 2 Decker					
VOC	Stack Test	5.6 lb/hr			Sum of acetaldehyde, formaldehyde, methanol, and terpenes (0.48 lb terpenes/ADTUBP)
Acetaldehyde	NCASI	5.9E-03 lb/ADTUBP			1,100 ADTUBP/day 401,500 ADTUBP/yr 20% SF
Acetone	Stack Test	7.52 lb/hr			
Formaldehyde	NCASI	3.3E-03 lb/ADTUBP			1,100 ADTUBP/day 401,500 ADTUBP/yr 20% SF
Methanol	Stack Test	3.3 lb/hr			

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
TRS	NCASI	0.044 lb/ADTUBP			1,100 ADTUBP/day 401,500 ADTUBP/yr 20% SF
Source SN-43 - Tub Grinder					
PM <sub>10</sub> /PM	AP-42 Table 3.3-1	0.31 lb/MMBtu			4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
SO <sub>2</sub>	AP-42 Table 3.3-1	0.29 lb/MMBtu			4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
VOC	AP-42 Table 3.3-1	0.36 lb/MMBtu			4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
CO	AP-42 Table 3.3-1	0.95 lb/MMBtu			4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
NO <sub>x</sub>	AP-42 Table 3.3-1	4.41 lb/MMBtu			4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
HAPs	AP-42 Table 3.3-2				4 MMBtu/hr 258,000 gallon/yr 0.13 MMBtu/gal
Sources SN-44a, SN-44b, SN-44c and SN-44d - Paper Machines					
VOC	Testing	44A: 2.0 44B: 4.7 44C: 5.6 44D: 10.3			Emission factors are in lb/hr by machine.
Acetaldehyde	NCASI	0.033 lb/ADTFP			<u>SN-44A</u> 19.1 ADTFP/hr 167,316 ADTFP/yr  <u>SN-44B &amp; C</u> 30.77 ADTFP/hr 269,553 ADTFP/yr  <u>SN-44D</u> 79.92 ADTFP/hr

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					700,070 ADTFP/yr  ADTFP – air dried tons of finished product 20% SF
Acrolein	NCASI	1.6E-3 lb/ADTFP			See Comments for Acetaldehyde 20% SF
Formaldehyde	NCASI	6.4E-3 lb/ADTFP			See Comments for Acetaldehyde 20% SF
Methanol	Testing	44A: 2.00 44B: 4.70 44C: 5.60 44D: 6.80			Limited by VOC and Methanol in shower water Emission factors are in lb/hr by machine.
Source SN-45 - Oxygen Delignification System (NCASI factors have a 20% safety factor)					
VOC	Stack Test	9.1 lb/hr			1,100 ADTUBP/day
CO	Stack Test	16.5 lb/hr			1,100 ADTUBP/day
Acetaldehyde	NCASI	0.034 lb/ADTP			1,100 ADTUBP/day
Formaldehyde	NCASI	0.0017 lb/ADTP			1,100 ADTUBP/day
Methanol	Stack Test	9.11 lb/hr			1,100 ADTUBP/day
TRS	Stack Test	2 lb/hr			1,144 ADTUBP/day
SN-46 – Haul roads					
PM/PM <sub>10</sub>	Estimate	0.16 lb/VMT		Subject to road maintenance plan	Overall lb/VMT for both paved/undpaved with controls included
SN-50, SN-53, SN-54a, SN-54b, SN-57, SN-58, and SN-59 – Stationary RICE					
PM/PM <sub>10</sub>	AP-42 Table 3.3-1				
SO <sub>2</sub>	AP-42 Table 3.3-1				
VOC	AP-42				

SN	Emission Factor Source (AP-42, testing, etc.)	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
	Table 3.3-1				
CO	AP-42 Table 3.3-1				
NO <sub>x</sub>	AP-42 Table 3.3-1				
HAP	AP-42 Table 3.3-2				
SN-55 – Paper Additive Silos					
PM/PM <sub>10</sub>	Mass Balance	0.03 gr/dscf	Fabric filter		
SN-56 – Dye Operation					
VOC	Mass Balance				Emission factor varies by MSDS for each product used.

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
01	PM	5	Every 5 years	§19.702
01	PM <sub>10</sub>	201A or 5 and 202	Every 5 years	§19.702
01	VOC	Method 25A	Every 5 years	§19.702
01	Filterable PM	Multiple refer to Subpart DDDDD, Table 5	Annually	Boiler MACT
01	HCl	Multiple refer to Subpart DDDDD, Table 5	Annually	Boiler MACT
01	Mercury	Multiple refer to Subpart	Annually	Boiler MACT

SN	Pollutants	Test Method	Test Interval	Justification
		DDDDD, Table 5		
02	PM/PM <sub>10</sub>	5 or 29	Initial test	§63.865
02	O <sub>2</sub>	3, 3A or 3B	Initial test	§63.865
02	PM	5	Every five years	§18.1002
02	PM <sub>10</sub>	201A or 5 and 202	Every five years	§19.702
02	VOC	25A	Every five years	§19.702
05	PM	5	Every five years	§18.1002
05	PM <sub>10</sub>	201A or 5 and 202	Every five years	§19.705
05	VOC	25A	Every five years	§19.705
05	HCl	26A	Every five years	§18.1002
05	Filterable PM	Multiple refer to Subpart DDDDD, Table 5	Annually	Boiler MACT
05	HCl	Multiple refer to Subpart DDDDD, Table 5	Annually	Boiler MACT
05	Mercury	Multiple refer to Subpart DDDDD, Table 5	Annually	Boiler MACT
06	VOC	25A	Every five years	§19.705
06	PM	5 and 202	Every five years	§19.705
06	PM <sub>10</sub>	201A or 5 and 202	Every five years	§19.705
08	TRS	16	Every five years	§18.1002
08	VOC	25A	Every five years	§19.705
08	O <sub>2</sub>	3A or 3B	Once	§63.865
08	PM	5	Every five years	§19.705
08	PM <sub>10</sub>	201A or 5 and 202	Every five years	§19.705
08	Ammonia	Method 206	Every five years	§18.1002
09	PM	5 or 29	Once	§63.865
09	O <sub>2</sub>	3A or 3B	Once	§63.865
09	NO <sub>x</sub>	7E	Every five years	§19.705
14	PM <sub>10</sub>	201A or 5 and 202	Every five years	§19.702
14	VOC	25A	Every five years	§19.702
15	TRS	16	Annual	§19.804

SN	Pollutants	Test Method	Test Interval	Justification
15	Ammonia	206	Every five years	§19.703
15	PM	5 or 29	Initial	63.865
15	O <sub>2</sub>	3 or 3A	Initial	63.865
15	VOC	Method 25A	Every five years	§19.702
16, 17,18	Pressure differential	Pressure transmitter	Yearly	63.453(a)(1)
16, 17,18	Cl <sub>2</sub> , ClO <sub>2</sub>	NCASI Special Report Number 91-07	Every five years	18.1002
16,17,18	CO	10B	Every five years	§19.703
16,17,18	VOC	25A	Every five years	§19.703
20	Cl <sub>2</sub> , ClO <sub>2</sub>	NCASI Special Report Number 91-07	Every five years	18.1002
21	COD	Water Test	Daily	63.453(j)
21	Horsepower of Aerator units	Observation	Daily	63.453(j)
21	Inlet liquid flow	Flow Meter	Daily	63.453(j)
21	Liquid Temperature	Thermocouple	Daily	63.453(j)
21	BOD <sub>5</sub> percent reduction	BOD <sub>5</sub>	Quarterly	63.453(j)
22	Methanol	25D	Yearly	§18.1003
22	Acetone	25D	Yearly	§18.1003
37	VOC	25D	Yearly	§19.702
45	VOC	25A	Every 5 years	§19.705
45	CO	10	Every 5 years	§19.705
54a	Formaldehyde	Method 320 or 323 of 40 CFR Part 63, App A	Initial	§63.6620 One test per engine
54b	Formaldehyde	Method 320 or 323 of 40 CFR Part 63, App A	Initial	§63.6620 One test per engine

## 17. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
01	CO, NO <sub>x</sub>	CEM	Every 15 minutes; Average once/ hour	N
01	Opacity	COM	Six-minute average	N
02	TRS	CEM	12-hour Average	N
02	CO, O <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	N
02	Opacity	COM	Six-minute average	N
05	SO <sub>2</sub> , CO, NO <sub>x</sub> , O <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	N
05	Temperature Scrubbing Liquid Flow rate Pressure Drop of Gas Stream	CPMS	Continuous	N
06	SO <sub>2</sub> , CO, NO <sub>x</sub> TRS, O <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	N
06	Opacity	COM	Six-minute average	N
06	Floor Tube Temperature	CPMS	Continuous	N
08	Pressure Drop of gas stream Pressure of liquid supply Scrubbing liquor flow rate	CPMS	Continuous	Y
09	CO, TRS, O <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	N
09	Scrubbing liquid flow rate Air pressure drop across scrubber Temperature of lime kiln	CPMS	Continuous	N
14	Opacity	COM	Six-minute average	N
14	CO, NO <sub>x</sub> , TRS, O <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	N
14	SO <sub>2</sub>	CEM	Every 15 minutes; Average once/ hour	Y
14	Temperature	CPMS	Continuous	N
15	Scrubber gas pressure drop	CPMS	Continuous	Y

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
	Scrubber Liquid Pressure			
15	Scrubbing liquid flow rate	CPMS	Every 8 hours – average the three daily readings	N
16	Inlet air flow rate Scrubbing liquid flow rate Inlet pH of Scrubber Liquid	CPMS	Continuous	N
17	Inlet air flow rate Scrubbing liquid flow rate Inlet pH of Scrubber Liquid	CPMS	Continuous	N
18	Inlet air flow rate Scrubbing liquid flow rate Inlet pH of Scrubber Liquid	CPMS	Continuous	N
20	Absorption Water Temperature	Thermocouple	Once per shift	N
36	Temperature	CPMS	Continuous	N

18. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01	Fuel Usage	Recording of pounds of fuel used	Daily	N
01	Fuel Usage	Recording of pounds of fuel used	Monthly Average	Y
01	Fuel Usage	Recording of pounds of fuel used	12-month Rolling Average	Y
01	Hourly NO <sub>x</sub> Emission Rate	237 lb/hr	Hourly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
01	30-day average NO <sub>x</sub> emission rates	0.3 lb/MMBtu	30-day rolling average	Y
01	30-day average CO emission rates	0.35 lb/MMBtu	30-day rolling average	Y
01	Moisture Content of Biomass Fuel	Must exceed 40% by weight on an as fired annual heat input basis	Monthly	Y
01	HCl and Mercury content per fuel analysis	No standard – Boiler MACT	Concurrently with performance testing, annually	Y
01	Type of fuel and amount during Startup/Shutdown	No standard – Boiler MACT	Per Event	Y
01	BTU Loading	790 MMBTU/hr	Daily	Y
02	TRS Concentration		Twelve-hour Average	Y
02	O <sub>2</sub>		Twelve-hour Average	N
02	Period pre-coat filter isolated	75% feed capacity for kiln		N
02	CO and NO <sub>x</sub>	240.9 tpy CO 291.3 tpy NO <sub>x</sub>	30-day rolling averages	N
02	%Solids of lime mud feed	65% 30-day rolling average	Daily	N
02	CaO Production	Ton/d	daily	Y
05	Fuel Usage	tpd	daily	Y
05	Fuel Usage	tpd	Month	Y
05	Moisture Content of Biomass Fuel	Must exceed 40% by weight on an as fired annual heat input basis	Monthly	Y
05	HCl and Mercury content per fuel analysis	No standard – Boiler MACT	Concurrently with performance testing, annually	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
05	Type of fuel and amount during Startup/Shutdown	No standard – Boiler MACT	Per Event	Y
05	Biomass heat input	Must be 10% or greater on an annual heat input basis	Monthly	Y
06	TRS emission	12-hour average	Daily	N
06	O <sub>2</sub> Concentration	12-hour average	Daily	N
06	Hourly HCl Emissions	One-hour average	Hourly	N
06	Floor Tube Temperature	3-hour average	Hourly	Y
06	Floor Tube Temperature	monthly average	monthly	Y
06	Black Liquor Solids Rate	Daily feed	Daily	N
08	Pressure Drop of gas stream	Instantaneous	Once per shift	N
08	Pressure of liquid supply	Instantaneous	Once per shift	N
08	Scrubbing Liquor flow Rate	Flow Meter	Hourly	Y
08	Pressure Drop of gas stream	Pressure Drop	Once Every 15-minutes	Y
08	Scrubbing Liquor flow Rate	Flow Meter	Once Every 15-minutes	Y
09	TRS Concentration	CEMS	12-hour average	N
09	O <sub>2</sub> Concentration	CEMS	12-hour average	N
09	Pressure Drop of gas stream	Instantaneous	Once per shift	N
09	Pressure of liquid supply	Instantaneous	Once per shift	N
09	Temperature	1-hour Rolling average	hourly	N
09	%Solids of lime mud feed	65% 30-day rolling average	Daily	N
09	CaO Production Rate	daily	daily	
09	Liquid Flow rate	Daily		N
09	Gas pressure drop	CEMs	Daily	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
12	Fuel Usage		Daily	Y
12	Fuel Usage		Monthly	Y
12	Hours of Operation		Hour	Y
12	Steam Loading		Hourly	N
14	TRS concentration		12-hour average	N
14	Black Liquor Firing Rate		Time below 1.5 MMLbs/day	N
14	HCl emissions	54.5 lb/hr and 238.71 tpy	Hourly	Y
14	BLS firing rate		Daily	Y
15	Scrubber Gas Pressure drop		Once per shift/ once every 15 minutes	Y
15	Scrubber Liquid Supply Pressure		Once per shift	Y
15	Scrubber Liquid flow Rate	175 gpm	Once per shift/ once every 15 minutes	Y
16	Fan Amperage	65 -105 amperes	Once per shift	Y
16	Scrubber Liquid flow Rate	300 gallons/minute	Once per shift	
17	Scrubber Liquid flow Rate	300 gallons/minute	Once per shift	
17	Fan Amperage	50 -105 amperes	Once per shift	Y
18	Scrubber Liquid flow Rate	350 gallons/minute	Once per shift	
18	350 gallons/minute	30 -80 amperes	Once per shift	Y
20	Scrubber Water Temperature		Once per shift	N
23	Tank Dimensions			N
23	Methanol Throughput	18,850,000 lbs/12 months	Monthly	Y
28	Formic Acid throughput	5,336,000 lbs/12 months	Monthly	Y
29	Lime processed	420,500 tons/12 months	Monthly	Y
36 Tank #10	Weak Black Liquor Throughput	2,018,304,000 gallon/12 months	Monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
37	Finished Product (Pulp)	328,500 tons of air dried pulp	Monthly	Y
38	Woodchips processed	4,320,000 tons/12 months	Monthly	Y
40	Time sample port is opened	Only when retrieving sample	Daily	N
40	Spacing of digester blows	Minimum of 25 minutes	Daily	N
41	Sludge put in landfill	163,000 tons/12 months	Monthly	Y
42, 45	Unbleached Pulp	535,090 tons of air dried unbleached pulp	Monthly	Y
43	Fuel Consumption	258,000 gallons/12 months	Monthly	Y
44A	Finished Product	167,316 tons air dried paper/12 months	Monthly	Y
44B	Finished Product	269,553 tons air dried paper/12 months	Monthly	Y
44C	Finished Product	269,553 tons air dried paper/12 months	Monthly	Y
44D	Finished Product	700,070 tons air dried product/12 months	Monthly	Y
01,03,05	Tire derived fuel	220 tons/24-hours	Daily	Y
ALL	Units Operating at less than 25% capacity		Yearly	Y
RICE	Hours of Operation	500 hrs / 12 months	Per event	Y
56	Dye Usage	12.8 tons/12 months	Monthly	Y

## 19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	20	Boiler fired with many different fuels	COMS - submittals in accordance with CEM standards
01	10	Boiler MACT	COMS operated according to Boiler MACT
02	20	This is a lime kiln. Particulate emissions are present which are not entirely caused by fuel combustion.	COMS - submittals in accordance with CEM standards
03	5	Fires only natural gas.	Fires only natural gas
05	20	This is a boiler which is fired with many different types of fuel.	Scrubber parameters - no submittal of records required.
06	20	Recovery boiler. The highest allowable under the NSPS is 35%. The boiler is limited to 20% because of Department regulations.	COMS - submittals in accordance with COM standards
08	20	Smelt tank with 18 lb/hr of particulate matter emissions.	Scrubber parameters - Submittal of records as required by 63 Subpart MM
09	20	This is a lime kiln which has particulate matter emissions from fuel combustion as well as from proper operation of the kiln.	Scrubber parameters - Submittal of records as required by 63 Subpart MM
14	20	Recovery boiler. The highest allowable under the NSPS is 35%. The boiler is limited to 20% because of	COMS - submittals in accordance with CEM standards

SN	Opacity	Justification for limit	Compliance Mechanism
		Department regulations.	
15	20	Smelt tank with PM emissions of 18.7 lb/hr.	Scrubber parameters - Submittal of records as required by 63 Subpart MM
43	5	Tub grinder fired with diesel fuel.	Weekly observations - no submittal of records required
RICE	20 – Diesel 5 – Propane/Nat Gas	Regulation 19.501	Daily for events lasting more than 24 hours and annual check

20. DELETED CONDITIONS:

Former SC	Justification for removal
213a and 213b	Redundant with 200a and 200b
64, 65, 66	These were CAM provisions. Facility demonstrated the source should be exempt from CAM.
175, 176	Testing conditions which were re-evaluate and are no longer necessary.

21. GROUP A INSIGNIFICANT ACTIVITIES:

The following is a list of Insignificant Activities including revisions by this permit.

Source Name	Group A Category	Emissions (tpy)						
		PM/PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs	
							Single	Total
250 gal lubricating/hydraulic oil tanks (5,000 gal site wide)	A2			5E-05				
Used Oil Storage Tank (10,000 gal)	A3			8E-05				
Woodyard Diesel Tank (9,425 gal)	A3			0.014				
Woodyard Hydraulic Oil Tank (9,425 gal)	A3			9E-05				

Medium Diesel Tanks (<10,000 gal site wide)	A3			0.014				
Small Diesel Tanks (<1,000 gal each)	A3			0.01				
Paper Machine Portable Tote Bins	A3			0.01				
Caustic Storage Tanks	A4							
Laboratory Hoods	A5			0.21				0.21
Mill Services (storeroom) gasoline tank (130,000 gal)	A13			1.65				
Brock Services Gasoline Tank (552 gal)	A13			0.27				
Coal Pile	A13	0.03						
Turpentine Storage Tank (18,612 gal)	A13			0.546				
Cooling Tower <sup>a</sup> #1	A13	0.05						
Cooling Tower <sup>a</sup> #2	A13	0.02						
Cooling Tower <sup>a</sup> #3	A13	0.03						
Cooling Tower <sup>a</sup> #4	A13	0.05						
Cooling Tower <sup>a</sup> #5	A13	0.11						
Cooling Tower <sup>a</sup> #6	A13	0.04						
Cooling Tower <sup>a</sup> #7	A13	0.005						
Cooling Tower <sup>a</sup> #8	A13	0.060						
Cooling Tower <sup>a</sup> #9	A13	0.008						
Cooling Tower <sup>a</sup> #10	A13	0.053						
Cooling Tower <sup>a</sup> #11	A13	0.025						
Cooling Tower <sup>a</sup> #12	A13	0.454						
Cooling Tower <sup>a</sup> #13	A13	0.329						
Cooling Tower <sup>a</sup> #14	A13	0.350						
Cooling Tower <sup>a</sup> #15	A13	0.387						
Converting Area	A13			0.26				0.26
Mobile Wood Chipper	A13	0.31						
Materials Mixer #1	A13	0.15						
Materials Mixer #2	A13	0.15						

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22. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0287-AOP-R24

## APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

## Fee Calculation for Major Source

Revised 03-11-16

Domtar A.W. LLC - Ashdown Mill  
 Permit #: 0287-AOP-R25  
 AFIN: 41-00002

\$/ton factor	28.14	Annual Chargeable Emissions (tpy)	15741.13
Permit Type	Modification	Permit Fee \$	1000

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0
Initial Title V Permit Fee Chargeable Emissions (tpy)	

*HAPs not included in VOC or PM:*

*Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride*

*Air Contaminants:*

*All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)*

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		2100.73	2100.73	0	0	2100.73
PM <sub>10</sub>		1798.03	1798.03	0		
PM <sub>2.5</sub>		0	0	0		
SO <sub>2</sub>		5483.41	5483.41	0	0	4000
VOC		5669.31	5669.31	0	0	4000
CO		12058.58	12058.58	0		
NO <sub>x</sub>		5548.9	5548.9	0	0	4000
Lead	<input type="checkbox"/>	0.82	0.82	0		















