STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0385-AOP-R13 AFIN: 35-00017

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

American Kraft Paper Industries LLC 1701 Jefferson Parkway White Hall, Arkansas 71602

3. PERMIT WRITER:

Amanda Leamons

4. NAICS DESCRIPTION AND CODE:

NAICS Description:Paper (except Newsprint) MillsNAICS 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	Short Description of Any Changes
	(New, Renewal, Modification,	That Would Be Considered New or
	Deminimis/Minor Mod, or	Modified Emissions
	Administrative Amendment)	
8/28/2024	Renewal	No new or modified sources

6. **REVIEWER'S NOTES:**

American Kraft Paper Industries (American Kraft), operates the pulp and paper mill located in Pine Bluff, Arkansas (formerly operated by Twin Rivers Pine Bluff, LLC). This permit revision it to renew American Kraft's Title V Air Permit. Along with the renewal, specific conditions were updated to reflect updates to federal requirements and to clarify compliance mechanisms in Specific #13 and #30, and the PM/PM₁₀ emission limits were corrected to follow divisional rounding procedures. There were no physical changes or changes to the method of operation involved with this permit revision. The updated emission limits resulted in an increase the overall annual permitted emission limits by 0.2 ton of PM and 0.2 ton of PM₁₀, no other pollutant emission limits changed with this revision. Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 2 of 16

7. COMPLIANCE STATUS:

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

The most recent inspection was on May 21, 2024 the facility was found to be out of compliance with SC 26. The highest amount of petroleum-based additive used during any consecutive 12-month period was 61,320 gallons for the period ending October 2023. Permittee recorded 6 months (August 2023 – January 2024) with exceedances to this permitted limit. Permittee stated that the 6 months of exceedances were due to a faulty monitor which has since been replaced.

For SC 239 and the Cluster Rule, the permittee must inspect the closed vent system for defects/leaks and report issues/repairs. According to permittee's 2023 ACC, permittee has not yet begun physically repairing the issues noted in the monthly LDAR reports. Repairs are currently in the planning phase.

A draft CAO is in routing to address the 2022/2023 LDAR repairs.

In November 2024 the facility started a stack test in accordance with SC 56 for the Hog Fuel Boiler (SN-05)– the tested result for CO exceeded the permit limit and the facility ceased the test and notified the DEQ – OAQ. The matter is currently under review in enforcement.

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? NA

- b) Is the facility categorized as a major source for PSD? Y
- Single pollutant \geq 100 tpy and on the list of 28 or single pollutant \geq 250 tpy and not on list

If yes for 8(b), explain why this permit modification is not PSD. No modification permitted – this was a renewal with no physical changes permitted.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)	
Facility	HAPs (Methanol)	Part 63 Subpart S (Cluster Rule)	
SN-01, SN-02, SN-04	PM/HAPs	Part 63 Subpart MM	

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
		(Cluster Rule)
	Filterable PM	
SN-05 and SN-06	СО	Part 63 Subpart DDDDD
	HCl	(Boiler MACT)
	Mercury	
SN 57 & SN 60	HAD	Part 63 Subpart ZZZZ
SIN-37 & SIN-00	HAFS	(RICE MACT)
SN-60	PM, CO, NOx, HC	Part 60, Subpart IIII

10. UNCONSTRUCTED SOURCES:

Unconstructed	Permit	Extension	Extension	If Greater than 18 Months without
Source	Approval Date	Requested Date	Approval Date	Approval, List Reason for Continued Inclusion in Permit
NA				

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 Rule 18 requirement.)

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

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
SN-01 TRS & PM/PM ₁₀		Rule 19.804(c) for TRS & 40 C.F.R. 60.284/ 64.2(b)(1)(vi)
SN-02	TRS & PM/PM ₁₀	Rule 19.804(c) for TRS & 40 C.F.R. 60.284/ 64.2(b)(1)(vi)
SN-04	PM/PM ₁₀	40 C.F.R. 60.284/ 64.2(b)(1)(vi)
SN-05	PM/PM ₁₀	NESHAP Subpart DDDDD

13. EMISSION CHANGES AND FEE CALCULATION:

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 4 of 16

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: *There are no increases in any NCAP limits, this evaluation was conducted previously and retained for this permit renewal.*

The non-criteria pollutants listed below were evaluated. Based on Department procedures for review of non-criteria pollutants, emissions of all other non-criteria pollutants are below thresholds of concern.

1st Tier Screening (PAER)

Estimated hourly emissions from the following sources were compared to the Presumptively Acceptable Emission Rate (PAER) for each compound. The Department has deemed the PAER to be the product, in lb/hr, of 0.11 and the Threshold Limit Value (mg/m³), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m ³)	$\begin{array}{l} \text{PAER (lb/hr)} = \\ 0.11 \times \text{TLV} \end{array}$	Proposed lb/hr	Pass?
Acenaphthene	0.02	0.0022	0.000002	Yes
Acenaphthylene	0.02	0.0022	0.000005	Yes
Acetaldehyde	45	4.95	2.82	Yes
Acetone	1187	130.58	3.22	Yes
Acrolein	0.23	0.0253	0.1865	No
Ammonia	24.38	2.68	11.97	No
Anthrance	0.02	0.0022	0.000004	Yes
Arsenic	0.01	0.0011	0.001	Yes
Benz(a)anthracene	0.02	0.0022	2.0 E-6	Yes

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 5 of 16

Pollutant	TLV (mg/m ³)	$PAER (lb/hr) = 0.11 \times TLV$	Proposed lb/hr	Pass?
Benzo(a)pyrene	0.02	0.0022	2.8 E-7	Yes
Benzo(b)fluoranthene	0.02	0.0022	2.4 E-7	Yes
Benzo(g,h,i)perylene	0.02	0.0022	5.9 E-7	Yes
Benzo(k)fluoranthene	0.02	0.0022	2.97 E-7	Yes
Beryllium	0.0005	0.00006	0.000035	Yes
Cadmium	0.01	0.0011	0.000825	Yes
Chromium +6	0.05	0.0055	0.000365	Yes
Chrysene	0.02	0.0022	4.97 E-7	Yes
Dibenzo(a,h)anthracene	0.02	0.0022	6.82 E-7	Yes
Fluorene	0.02	0.0022	0.00003	Yes
Hydrogen chloride	2.98	0.3278	1.99	No
Hydrogen sulfide	1.394	0.153	0.59	No
Indeno(1,2,3-cd)pyrene	0.02	0.0022	5.19 E-7	Yes
Manganese	0.2	0.022	0.0238	No
Methanol	262	28.82	38.57	No
Mercury	0.1	0.011	0.00072	Yes
Phenanthrene	0.02	0.0022	4.0 E-6	Yes
Phosphorus	0.1	0.011	0.0372	No
Pyrene	0.02	0.0022	5.0 E-6	Yes
Sulfuric Acid	0.2	0.022	0.23	No

2nd Tier Screening (PAIL)*

AERMOD air dispersion modeling was performed on the estimated hourly emissions from the following sources, in order to predict ambient concentrations beyond the property boundary. The Presumptively Acceptable Impact Level (PAIL) for each compound has been deemed by the Department to be one one-hundredth of the Threshold Limit Value as listed by the ACGIH.

All model results are based on the 1st 24-hr avg. high using 1 year of metdata from 2016, unless otherwise noted.

Pollutant	PAIL (μg/m ³) = 1/100 of TLV	Modeled Hourly Rate (lb/hr)	Modeled Concentration $(\mu g/m^3)$	Pass?
Acrolein	2.3	0.1865	1.90	Yes
Ammonia	243.8	11.97	4.86	Yes
Hydrogen chloride	29.8	1.99	0.54	Yes
Hydrogen sulfide	13.94	0.59	4.66	Yes
Manganese	2.0	0.5711	0.037	Yes
Methanol	2,620	38.57	623.59	Yes
Phosphorus	1.0	0.372	0.0392	Yes
Sulfuric Acid	2.0	0.23	0.039	Yes

*modeling conducted prior to R13 permit.

c) H₂S 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 H₂S Standards Y If exempt, explain: Limits for SN-01, SN-02, and SN-04 are set in Regulation 19 §19.804 and Table 19.8.1 – GFP (formerly Delta Natural Kraft) complies with the limits through CEMs and annual TRS testing.

15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
01	NESHAP MM NCASI 1020 & 1050 CEMS	$\begin{array}{c} 0.354 \ lb_{PM}/ton_{BLS} \\ 0.354 \ lb_{PM10}/ton_{BLS} \\ 0.07 \ lb_{SO2}/ton_{CaO} \\ 0.05 \ lb_{VOC}/ton_{CaO} \\ 0.18 \ lb_{CO}/ \ ton_{CaO} \\ 1.69 \ lb_{NOx}/ton_{CaO} \\ 3.4 \ lb_{TRS}/hr \end{array}$	Scrubber	80%	See permit application for emission factor for other non-criteria pollutants.
02	NESHAP MM NCASI 1020 & 1050 Stack Test	$\begin{array}{l} 0.86 \ lb_{PM}/ton_{BLS} \\ 0.86 \ lb_{PM10}/ton_{BLS} \\ 0.60 \ lb_{SO2}/ton_{BLS} \\ 2.14 \ lb_{VOC}/ton_{BLS} \end{array}$	Scrubber and Auxiliary Scrubber	90%	See permit application for emission factor for other non-criteria pollutants.

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 7 of 16

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
<u></u>	CO Study	7,703.6 lb _{CO} /hr 1.33 lb _{NOx} /ton _{BLS} 35 lb _{TRS} /hr	ESP	98%	
03	NCASI 1020 & 1050	0.156 lb _{PM} /ton _{CaO} 0.156 lb _{PM10} /ton _{CaO} 0.057 lb _{VOC} /ton _{CaO} 5.4e-4 lb _{TRS} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
04	NESHAP MM NCASI 884, 1020, & 1050	$\begin{array}{c} 0.329 \ lb_{PM}/ton_{BLS} \\ 0.329 \ lb_{PM10}/ton_{BLS} \\ 0.015 \ lb_{SO2}/ton_{BLS} \\ 0.066 \ lb_{VOC}/ton_{BLS} \\ 0.008 \ lb_{CO}/ton_{BLS} \\ 0.02 \ lb_{NOx}/ton_{BLS} \\ 0.0118 \ lb_{H2S}/ton_{BLS} \\ 1.13e-3 \ lb_{DDS}/ton_{BLS} \\ 4.93e-4 \ lb_{DS}/ton_{BLS} \\ 1.93e-3 \ lb_{MM}/ton_{BLS} \end{array}$	Scrubber	99%	See permit application for emission factor for other non-criteria pollutants.
	NCASI 1020 &	0.13 lb _{PM} /MMBtu 0.13 lb _{PM10} /MBtu	Wet Scrubber	80%	See permit application
05	1050 Stack Test BoilerMACT	$\begin{array}{l} 1.06\text{E-2 } 1\text{b}_{\text{SO2}}/\text{MMBtu} \\ 5.91 \ \text{lb}_{\text{VOC}}/\text{hr} + 20\% \\ 164.6 \ \text{lb}_{\text{CO}}/\text{hr} + 20\% \\ 0.212 \ \text{lb}_{\text{NOX}}/\text{MMBtu} \end{array}$	Multiclone	N/A	for emission factor for other non-criteria pollutants.
06	AP-42 Table 1.4-2	7.6 lb _{PM} /MMscf 7.6 lb _{PM10} /MMscf 0.6 lb _{S02} /MMscf 5.5 lb _{VOC} /MMscf 84 lb _{C0} /MMscf 100 lb _{NOx} /MMscf	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
10	AP-42, Table 11.17-4	25 ton _{FL} /hr 4500 ton _{FL} /yr 0.61 lb _{PM} /Ton _{FL} 0.61 lb _{PM10} /Ton _{FL}	N/A	N/A	
12	AIRS NCASI	0.02 lb _{S02} /ADTUBP 0.337 lb _{VOC} /ton BLS 5.2e-3 lb _{H2S} /ton _{BLS} 4.25e-2 lb _{DDS} /ton _{BLS} 8.42e-3 lb _{DS} /ton _{BLS} 1.52e-2 lb _{MM} /ton _{BLS}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
13, 17	NCASI 677 & 1020	54.0 ton _{CHIP} /hr 602,250 ton _{CHIP} /yr 0.12 lb _{VOC} /ton chips 0.0012 lb _{TRS} /ton chips	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
14	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.035 lb _{VOC} /ton _{CaO}	N/A	N/A	See permit application for emission factor for

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 8 of 16

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
					other non-criteria pollutants.
15A-J	NCASI AP-42, Table 1.4-2	NGC: 7.6 lb _{PM} /MMscf 7.6 lb _{PM10} /MMscf 0.6 lb _{SO2} /MMscf 0.5 lb _{VOC} /MMscf 84 lb _{CO} /MMscf 100 lb _{NOx} /MMscf 0.025 lb _{TRS} /ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
16A-C, 18, 19A-D	NCASI 1020 & 1050	29.3 sw ton/hr 208,050 sw ton/yr 30 ADTFP/hr 212,673 ADTFP/yr 0.25 lb _{VOC/} ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
20-22, 31, 32, 56	NCASI 1050	3.85 lb _{voc} /hr/tank 0.06651 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
23, 24, 31, 35	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.066 lb _{VOC} /ton _{CaO} 0.00062 lb _{TRS} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
27	NCASI 1020 & 1050	5.7 ton _{CaO} /hr 44,717 ton _{CaO} /yr 0.0075 lb _{VOC} /ton _{CaO}	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
28-30	NCASI 1050	0.033 lb _{voc} /hr/tank 0.889 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
33, 34	NCASI 1020 & 1050	0.54 lb _{voc} /hr/tank 0.21 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
36, 37	NCASI 1020 & 1050	4.84 lb _{voc} /hr/tank 0.21 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
38, 39, & 55	NCASI 1020 & 1050	0.11 lb _{voc} /hr/tank 0.26 lb _{TRS} /hr/tank	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
40	NCASI 1020 & 1050	20.8 ADTUBP/hr 161,370 ADTUBP/yr 0.71 lbyoc/ADTUBP	N/A	N/A	See permit application for emission factor for

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 9 of 16

SN	Emission Factor Source	Emission Factor (lb/ton, lb/hr, etc.)	Control Equipment	Control Equipment Efficiency	Comments
		1.48 lb _{TRS} / ADTUBP			other non-criteria pollutants.
41	Samples	$1.25 \text{ ton}_{VOC}/\text{qtr} + \text{safety factor}$ $31.21 \text{ ton}_{TRS}/\text{qtr} + \text{safety factor}$	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
50	NCASI AP-42, 13.2.4	602,250 ton _{CHIPS} /yr 9.415E-5 lb _{PM} /ton chips 4.453E-5 lb _{PM10} /ton chips 3.6 lb _{VOC} /acre-day 2.4E-4 lb _{VOC} /ton _{dry}	N/A	N/A	
51, 52, 54	NCASI 1020 & 1050	29.3 sw ton/hr 208,050 sw ton/yr 30 ADTFP/hr 212,673 ADTFP/yr 0.18 lb _{VOC} /ADTFP 0.02 lb _{TRS} /ADTFP	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
53	LandGEM	2,000 tons/yr acceptance rate	N/A	N/A	See permit application for emission factor for other non-criteria pollutants.
57	AP-42	50 hp Propane 7.21E-4 lb _{PM/PM10} /hp-hr 5.91E-4 lb _{S02} / hp-hr 0.015 lb _{VOC} / hp-hr 6.96E-3 lb _{CO} / hp-hr 0.011 lb _{NOX} / hp-hr	None	N/A	
58	AP-42	Silt Loading=3.0g/m ²	water roads	80%	
59	AP-42	Silt Content=5.1%	water roads	80%	
60	AP-42	144hp Diesel1.008 MMBTU/hr500 hr/yr2.2E-3 lb $2.05E-3 lb_{S02}/hp$ -hr $3.0 lb_{VOC}$ / MMBtu $3.7 lb_{CO}$ /MMBtu $3.0 lb_{NOx}$ /MMBtu	None	N/A	NESHAP ZZZZ Emergency RICE. See permit application for emission factor for other non-criteria pollutants.

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 10 of 16

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification	
01	PM	5 and 202	Every 5 years	Compliance Demonstration	
01	PM ₁₀	5 and 202 or 201A and 202	Every 5 years	Compliance Demonstration	
	PM	5 and 202			
	PM ₁₀	5 and 202 or 201A and 202		Compliance	
02	SO_2	6C	Every 5 years	Demonstration	
	VOC	25A			
	NO _X	7E			
04	TRS	16	Annually	§19.804	
01,02, &04	PM/PM10 Overall PM limit	See SCs 262 & 263	Initial 2020, every 5 yrs after	NESHAP Subpart MM	
05	Filterable PM CO HCl Mercury	As required by subpart	Initial and annually (opt. to extend to 3 yrs)	Boiler MACT Performance Testing	
	Total HAP	Performance Test (Method 305 of Part 60, Appendix A)	Annually (1 st quarter)		
	% Reduction OR Mass Removal	Performance Test	Annually (1 st quarter)		
41	Methanol OR Total HAP	Performance Test	Quarterly (minus 1 st Quarter)	NESHAP S	
	Operating Parameters	See SC 85	As needed		
	Soluble BOD5	Method 405.1 of Part 136	quarterly		

17. MONITORING OR CEMS:

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

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 11 of 16

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
	Concentration of TRS Gases	CEM	continuously	N
01	Pressure Differential Across the Scrubber	CMS	Every 15 minutes	Ν
	Liquid Flowrate Across the Scrubber	CMS	Every 15 minutes	N
	Concentration of TRS Gases	CEM	Continuously	Y
	Scrubber Liquor Flowrate	CMS	Every 15 minutes	N
02	Airflow Across TRS Scrubber	CMS	Every 15 minutes	Ν
	Secondary Power Across Each ESP Fields	CMS	Every 15 minutes	Ν
	CO Emissions	CEM	Continuously	Ν
04	Pressure Differential Across the Scrubber	CMS	Every 15 minutes	N
04	Liquid Flowrate Across the Scrubber	CMS	Every 15 minutes	Ν
05	Liquid Flowrate & Pressure drop across the Scrubber	CMS	Every 15 minutes	Y
05	Oxygen and CO OR CO ₂	CEMS or Oxygen Analyzer	Continuously	Y
41	Quarterly Emissions Model Methanol Formaldehyde Total Sulfides	24 - hour grab samples for model inputs	Every 3 months	N
57	Hours of operation	Non-resettable hour meter	Continuously	N
60	Hours of operation	Non-resettable hour meter	Continuously	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	Type of Fuel	Natural Gas Only	As needed	Ν

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 12 of 16

SN	Recorded Item	Frequency	Report (Y/N)	
	Lime Throughput	44,717 tons/yr	Monthly	Y
	Pressure Differential Across the Scrubber	See PT records onsite	Monthly	N
	Liquid Flowrate Across the Scrubber	See PT records onsite	Monthly	N
	Lime Kiln Temperature & Residence Time	Min: 1200°F Min: 0.5 seconds	Continuously	N
	Type of Fuel Fired	Black Liquor Solids and Natural Gas	As needed	Ν
	Black Liquor Solids Fired	173,448 tons/yr	Monthly	Y
	Petro Additive	55,000 gal/yr	Monthly	Y
	Petro Additive Max Sulfur Content	0.5%	Monthly	Y
02	Scrubber Liquor Flowrate	See PT records onsite	Monthly	Ν
	Airflow Across TRS Scrubber		Monthly	Ν
	Secondary Power Across Each ESP Fields	Minimum total 43.1 kW	Monthly	Ν
	Operational and Maintenance Procedures		As Needed	Ν
04	Pressure Differential Across the Scrubber	See PT records onsite	Monthly	Ν
04	Liquid Flowrate Across the Scrubber	See PT records onsite	Monthly	Ν
	Fuels fired to the source	Natural Gas & Woodwaste, only		Y
	Woodwaste Thru-put	109,500 tons/yr	Monthly	Y
	Scrubber fan Amperage	Number to show fan is operating	Monthly	N
05	Scrubber Differential Pressure	See PT records onsite	Continuously	Y
	Scrubber liquid flowrate	See PT records onsite	Continuously	Y
	Min Oxygen Level	See PT records onsite	Continuously	Y
	Moisture Content of Biomass	40% minimum	Monthly	Y
06	Amount of fuel used	NA	monthly	Y

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
	Tune-up for Gas 1 Units	See SC 202	annually	Y
13 & 17	Chip Throughput	602,250 tons/yr	Monthly	Y
	Type of Fuel Fired	Natural Gas Only	As Needed	Ν
	Paper Production	208,050 s.w. tons/yr	Monthly	Y
15A - 15J	Oven Dried Ton of Pulp (ODTP)	146,708 ODTP/yr	Monthly	Y
	Wet Strength Resin	1,040.25 tons/yr	Monthly	Y
41	Sample Concentration Flow Rate Data Model Results Quarterly Emissions	 See permitted limits	Quarterly	Ν
	Malfunctions		Upon occurrence	Y
	Hours of Operation (must identify emergency and non- emergency)	500 hr/calendar yr Total (100 hr/yr for main. checks/testing – 50hr of which can be nonemergency, see SC134)	Monthly	Y
57	Engine oil & filter changes	Every 500 hr or Annually	When changed	Ν
	Inspect Spark Plugs	Every 1,000 hr or Annually Replace as Necessary	When inspected	Ν
	Inspect all hoses/belts	Every 500 hr or Annually Replace as Necessary	When inspected	Ν
58&59	Road Dust Control Activities	Water Roads Weekly and as needed	Daily/Weekly	Ν
	Hours of Operation (must identify emergency and non- emergency)	500 hr/ calendar yr Total (100 hr/yr for main. checks/testing – 50hr of which can be nonemergency, see SC134)	Monthly	Y
60	Engine oil & filter changes	Every 500 hr or Annually	When changed	Ν
	Inspect air cleaner	Every 1,000 hr or Annually Replace as Necessary	When inspected	Ν
	Inspect all hoses/belts	Every 500 hr or Annually Replace as Necessary	When inspected	N

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
МЛМ	NESHAP MM		Each instance	V
IVIIVI	/corrective actions		– Report Quarterly	Ĭ

19. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
01	20%	19.503	Weekly Observations
02	20%	19.503	Monitor ESP fields (authorized by EPA in lieu of COMS)
03	20%	19.503	Daily Observations
04	20%	19.503	Weekly Observations
05	20%	19.503	Weekly Observations
06	5%	18.501 & Dept. Guidance	Natural Gas Fired
15A - 15J	5%	18.501 & Dept. Guidance	Natural Gas Fired
57	20%	19.503 & Dept. Guidance	Annual Observation
60	20%	19.503 & Dept. Guidance	Annual Observation

20. DELETED CONDITIONS:

Former SC	Justification for removal
	No conditions were deleted.

21. GROUP A INSIGNIFICANT ACTIVITIES:

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

	Group A	Emissions (tpy)						
Source Name	Category	PM/PM ₁₀	SO_2	VOC	СО	NO _x	HA	APs
							Single	Total
Portable Kerosene Heaters	Δ_1	0.25	0.42	0.05	0.42	1 51		0.0033
(0.152 MMBtu/hr)	A-1	0.23	0.42	0.05	0.42	1.51		0.0033
Paper Machine Press								
Transfer Blowbox	A-1	0.01	0.001	0.01	0.09	0.11		0.0021
(250,000 Btu/hr)								

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 15 of 16

	Group A	Emissions (tpy)						
Source Name	Category	PM/PM ₁₀	SO_2	VOC	СО	NO _x	HA	APs Total
Total A-1 Activities	A-1	0.26	0.421	0.06	0.51	1.62	Single	<0.01
Diesel Roll Grind Building Tank #1 (500 gal)	A-3			0.0006				0.0006
Diesel Roll Grind Building Tank #2 (500 gal)	A-3			0.0006				0.0006
Diesel Fire Pump House Tank (150 gal)	A-3			0.00062				0.00062
Kerosene Tank #1 (1,000 gal)	A-3			0.0015				0.0015
Kerosene Tank #2 (1,000 gal)	A-3			0.0014				0.0014
Kerosene Tank #3 (550 gal)	A-3			0.0008				0.0008
Strong Black Liquor Diesel Tank (1,000 gal)	A-3			0.0012				0.0012
Taxable Diesel Tank (550 gal)	A-3			0.0009				0.0009
Woodyard Refueling Diesel Tank (1,000 gal)	A-3			0.0012				0.0012
Used Oil Storage Tank #1 (4,200 gal)	A-3			0.004				0.004
Used Oil Storage Tank #2 (4,200 gal)	A-3			0.004				0.004
Hydraulic Fluid Tank (1,500 gal)	A-3			0.0018				0.0018
WWTS Diesel Tank #1 (360 gal)	A-3			0.0018				0.0018
WWTS Diesel Tank #2 (1,000 gal)	A-3			0.00042				0.00042
WWTS Diesel Tank #3 (270 gal)	A-3			0.0012				0.0012
WWTS Diesel Tank #4 (525gal)	A-3			0.00031				0.00031
Machine Room Lube Oil Tank (2,500 gal)	A-3			0.00063				0.00063
Total A-3 Activities	A-3			0.03				0.03
Spent Caustic Tank	A-4	NA	NA	NA	NA	NA	NA	NA
Woodyard Diesel Tank (TK9)	A-13			0.0007			0.0007	0.0007

Permit #: 0385-AOP-R13 AFIN: 35-00017 Page 16 of 16

	Group A	Emissions (tpy)						
Source Name	Category	PM/PM ₁₀	SO ₂	VOC	СО	NO _x	HAPs	
							Single	Total
Unleaded Gasoline Tank (TK10)	A-13			0.79			0.79	0.79
Leachate Storage Tank	A-13			0.15			< 0.0001	0.005
Cooling Tower	A-13	0.53						
Total A-13 Activities	A-13	0.53		0.94			0.79	0.79

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 #	
0385-AOP-R12	

APPENDIX A - EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Facility Name: American Kraft Paper Industries LLC Permit Number: 385-AOP-R13 AFIN: 35-00017

\$/ton factor Permit Type	28.14 Modification	Annual Chargeable Emissions (tpy) Permit Fee \$	<u>1764.29</u> 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			
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0		
Total Permit Fee Chargeable Emissions (tpy) Initial Title V Permit Fee Chargeable Emissions (tpy)	0.2		

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 condensible PM, H2S in TRS, etc.)

Revised 03-11-16

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
РМ		271.7	271.9	0.2	0.2	271.9
PM ₁₀		242.6	242.8	0.2		
PM _{2.5}		0	0	0		
SO ₂		64.9	64.9	0	0	64.9
VOC		639.4	639.4	0	0	639.4
со		22330.1	22330.1	0		
NO _X		350.8	350.8	0	0	350.8
Lead		0.0452	0.0452	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
TRS		362.3	362.3	0	0	362.3
Acetaldehyde		10.64	10.64	0		
Hydrogen chloride	v	8.66	8.66	0	0	8.66
Hydrogen fluoride	v	0.13	0.13	0	0	0.13
Methanol		175.48	175.48	0		
Total Other HAPs		28.4	28.4	0		
Acetone	v	12.85	12.85	0	0	12.85
Ammonia	v	52.38	52.38	0	0	52.38
Hydrogen sulfide		4.09	4.09	0		
Sulfuric acid	v	0.97	0.97	0	0	0.97