STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0580-AOP-R16 AFIN: 35-00016

1. PERMITTING AUTHORITY:

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

2. APPLICANT:

Evergreen Packaging, LLC
5201 Fairfield Road
Pine Bluff, Arkansas 71601

3. PERMIT WRITER:

Alexander Sudibjo

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
1/11/2021	Minor Mod	Replacement tank for SN-07

6. REVIEWER'S NOTES:

With this minor modification, the facility is replacing the No. 3 Smelt Dissolving Tank (SN-07) with a new tank. The new tank has the same throughput as the existing tank. The new tank is subject to NSPS BBa. The facility's permitted annual emissions are increasing by 0.10 tpy phenol, 0.87 tpy H_2S, and 0.05 tpy total other HAPs. The facility's permitted annual emissions are decreasing by 0.15 tpy acetophenone, 0.04 tpy carbonyl sulfide, 0.29 tpy chlorine, 0.29 tpy cresol, and 0.29 tpy hexachloroethane.

7. COMPLIANCE STATUS:

As of January 11, 2021, there are no compliance issues with the facility. ECHO (https://echo.epa.gov/detailed-facility-report?fid=110000450878) shows no violation identified as of September 24, 2020.

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?

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. This permit does not include a major modification as defined by 40 CFR §52.21(b)(2).

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
55	VOC	NSPS Subpart Kb
Facility	HAPs	NESHAP Subpart S
Facility	HAPs	NESHAP Subpart MM
51	TRS	NSPS Subpart BB
Facility	HAPs	NESHAP Subpart JJJJ
Engines SN-114 through SN-122	HAPs	NESHAP Subpart ZZZZ
Engines SN-114 and SN-115	PM, NO_x, CO	NSPS Subpart IIII
01, 13, and 15	PM, CO, Hg, and HCl	NESHAP DDDDD
07	PM, TRS	NSPS BBa

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
N/A				

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? N/A, this isn't a permit renewal

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

If yes, are applicable requirements included and specifically identified in the permit? 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
N/A		

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

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

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/m^3), as listed by the American Conference of Governmental Industrial Hygienists (ACGIH).

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Sulfuric Acid	0.802	0.088	7.45	N
Acetone	593.56	65.29	16.38	Y
Ammonia	17.42	1.92	23.44	N
Chlorine Dioxide	0.276	0.03	0.26	N
Methyl Ethyl Ketone	589.78	64.88	3.71	Y
Barium	0.5	0.055	0.05	Y
Zinc	-	-	4.17	Y
2,4-Dinitrotoluene	0.2	0.022	0.01	Y
4-Nitrophenol	-	-	8.53E-05	Y
Acetaldehyde	45.04	4.96	12.12	N
Acrolein	0.229	0.03	0.83	N
Bis(2-ethylhexyl)phthalate	-	-	1.64E-03	Y
Carbonyl Sulfide	12.29	1.36	4.68	N
Chlorine	7.71	0.85	1.52	N
Chloromethane	103.26	11.36	8.41	Y
Cresol	20.0	2.2	5.90	N
Formaldehyde	0.37	0.04	2.74	N
Hexachlorobenzene	0.002	2.2E-04	9.42E-04	N
Hexachloroethane	9.69	1.07	5.19	N
Hexane	176.24	19.39	6.94	Y
Hydrochloric Acid	2.99	0.33	18.51	N
Hydrogen Fluoride	0.41	0.05	0.15	N
Methanol	262.09	28.83	675.98	N
Pentachlorophenol	0.5	0.055	0.53	N
Phenol	19.25	2.12	5.29	N
Propylene Dichloride	46.21	5.08	0.27	Y
Total POM	-	-	0.93	Y

Pollutant	TLV (mg/m^3)	PAER (lb/hr) = 0.11 × TLV	Proposed lb/hr	Pass?
Antimony	0.5	0.055	0.04	Y
Arsenic	0.01	1.1E-03	0.07	N
Beryllium	5.0E-05	5.5E-06	1.33E-03	N
Cadmium	0.01	1.1E-03	0.05	N
Chromium compounds	0.5	0.055	0.09	N
Cobalt	0.02	2.2E-03	0.14	N
Manganese	0.02	2.2E-03	0.73	N
Mercury	0.1	0.011	1.58E-03	Y
Phosphorus	0.1	0.011	0.29	N
Selenium	0.2	0.022	0.11	N

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.

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Sulfuric Acid	8.02	0.47	Y
Ammonia	174.2	9.25	Y
Chlorine Dioxide	2.76	0.26	Y
Acetaldehyde	450.4	14.48	Y
Acrolein	2.29	1.05	Y
Carbonyl Sulfide	122.9	0.75	Y
Chlorine	77.1	2.83	Y
Cresol	200	4.00	Y
Formaldehyde	15	9.16	Y
Hexachlorobenzene	0.02	3.7E-04	Y

Pollutant	PAIL ($\mu g/m^3$) = 1/100 of Threshold Limit Value	Modeled Concentration ($\mu g/m^3$)	Pass?
Hexachloroethane	96.9	4.8	Y
Hydrochloric Acid	29.9	2.23	Y
Hydrogen Fluoride	4.1	0.026	Y
Methanol	2620.9	2234.7	Y
Pentachlorophenol	5.0	2.39	Y
Phenol	192.5	17.57	Y
Arsenic	0.1	0.007	Y
Beryllium	5.0E-04	3.8E-04	Y
Cadmium	0.1	0.0083	Y
Chromium compounds	5.0	0.035	Y
Cobalt	0.2	0.023	Y
Manganese	0.2	0.19	Y
Phosphorus	1.0	0.078	Y
Selenium	2.0	0.01	Y

a) H_2S 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_2S Standards N
If exempt, explain:

Pollutant	Threshold value	Modeled Concentration	Pass?
H_2S	20 parts per million (5-minute average*)	0.45 ppm (0.626 mg/m^3)	Y
	80 parts per billion (8-hour average) residential area	64.5 ppb (0.0899 mg/m^3)	Y
	100 parts per billion (8-hour average) nonresidential area	64.5 ppb (0.0899 mg/m^3)	Y

*To determine the 5-minute average use the following equation

$Cp = Cm\ (t_m/t_p)^{0.2}$ where

Cp = 5-minute average concentration
Cm = 1-hour average concentration
t_m = 60 minutes
t_p = 5 minutes

15. CALCULATIONS:

SN	Emission Factor Source	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type	Control Equipment Efficiency	Comments
01	NCASI AP-42, 1.6, 1.3, 1.4	Various HAPs	Scrubber	90%	-
02	NCASI AP-42, 1.3, 1.4	Various HAPs	ESP	95%	-
03	NCASI AP-42, 1.3, 1.4	Various HAPs	ESP	95%	-
04	NCASI AP-42, 1.3, 1.4	Various HAPs	ESP	98%	-
06	NCASI	Various HAPs	mist eliminator	95%	-
07	NCASI	Various HAPs	venturi scrubber	98%	-
08	NCASI	Various HAPs	venturi scrubber	98.3%	-
09 &10	NCASI AP-42, 1.3, 1.4	Various HAPs	wet venturi scrubber	95% (PM)	-
09 &10 Pet-coke	NCASI	Various HAPs	wet venturi scrubber	95%	Short term emissions based on test factor although the input rate was much higher than Evergreen's capacity. Annual emissions were based on burning 7,800 tpy of petcoke 20.7% of the rate tested by NCASI.

SN	Emission Factor Source	Emission Factor and units (lbs/ton, lbs/hr, etc)	Control Equipment Type	Control Equipment Efficiency	Comments
11	NCASI	Various HAPs	scrubber	99% (PM)	-
13	AP-42, 1.3, 1.4	Various HAPs	none	n/a	-
15	AP-42, 1.3, 1.4	Various HAPs	none	n/a	-
21	NCASI	Various HAPs	none	n/a	-
22, 23, 44	NCASI	Various HAPs	none	n/a	-
24, 25, 26, 27, 45, 46, 47	NCASI	Various HAPs	scrubber		-
28 thru 40	AP-42, 1.4	Various HAPs	None	n/a	-
41, 42	AP-42, 1.4	Various HAPs	none	n/a	-
48, 59	NCASI	Various HAPs	none	n/a	-
49	NCASI	Various HAPs	none	n/a	-
51	NCASI	Various HAPs	none	n/a	40% hardwood 60% softwood
52	NCASI	Various HAPs	none	n/a	-
53	NCASI	Various HAPs	none	n/a	-
54	NCASI	Various HAPs	none	n/a	-
55	TANKS 4.09d	-	none	n/a	-
57	LandGEM 3.02	Various HAPs	none	n/a	-
58	NCASI	Various HAPs	none	n/a	-
60	NCASI	Various HAPs	none	n/a	-
114-119, 121, & 122	AP-42, 3.3	Various HAPs	None	n/a	100 hours per year
120	AP-42, 3.3	Various HAPs	None	n/a	-

16. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN(s)	Pollutant	Test Method	Test Frequency	Justification For Test Requirement
01	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	CO_2e	EPA approved method	Every 5 years	
13 (two stacks)	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	H_2SO_4	8	See Specific Condition #27	
15 (two stacks)	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	H_2SO_4	8	See Specific Condition #39	
02	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	H_2SO_4	8	Every 5 years	
03	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	

SN(s)	Pollutant	Test Method	Test Frequency	Justification For Test Requirement
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	H_2SO_4	8	Every 5 years	
04 (two stacks)	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	H_2SO_4	8	Every 5 years	
06	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	TRS	16	annual	§19.8
07	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	TRS	16	annual	§19.8
08	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
	TRS	16	annual	§19.8
09	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	

SN(s)	Pollutant	Test Method	Test Frequency	Justification For Test Requirement
	VOC	25A	Every 5 years	
10	PM	5/202	Every 5 years	PAL
	PM_{10}	201A/202 or 5/202	Every 5 years	
	$PM_{2.5}$	202	Every 5 years	
	NO_x	7E	Every 5 years	
	CO	10	Every 5 years	
	SO_2	6C	Every 5 years	
	VOC	25A	Every 5 years	
Bleach Plant	CO	10	Every 5 years	PAL
27	HAPs	§63.457	Initial	§63.453
01, 13, 15	NESHAP DDDDD tests		Annual	§63.7515
07	See Specific Condition #164		Initial	§60.284a(c)(4)

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 of Monitoring (CEM, Pressure Gauge, etc)	Frequency	Report (Y/N)
01	scrubber	liquor flow rate and pressure drop	daily	compliance demo. for opacity limit
02	TRS	CEMS	continuous	yes
03	TRS	CEMS	continuous	yes
04	TRS	CEMS	continuous	yes
04	ESP	If ESP goes down, boiler must go down 50/50. The ESP has two halves. If one half of the ESP goes down, one half of the boiler must go down also.		
06	scrubber	liquor flow rate and pressure drop	daily	compliance demo. for opacity limit
07	scrubber	liquor flow rate and pressure drop	daily	compliance demo. for opacity limit
08	scrubber	liquor flow rate and pressure drop	daily	compliance demo. for opacity limit
09	TRS	CEMS	continuous	yes
09	scrubber	liquor flow rate	daily	compliance

SN	Parameter or Pollutant to be Monitored	Method of Monitoring (CEM, Pressure Gauge, etc)	Frequency	Report (Y/N)
				demo. for opacity limit
10	TRS	CEMS	continuous	yes
10	scrubber	liquor flow rate	daily	compliance demo. for opacity limit
11	scrubber	liquor flow rate	daily	compliance demo. for opacity limit
20	scrubber	liquor flow rate & pressure drop	daily	compliance demo. for opacity limit
27	scrubber	pH of scrubber effluent media Gas flow rate Constant operation of fan	continuous	no
49	Condensate collection tank	COD concentration Hp of Aerators Hardpipe liquid flow	Daily	no
		HAP concentration (CMS)	Continuous	no

18. RECORDKEEPING REQUIREMENTS:

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

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
01	Bark usage	482,700 tons/12cm	monthly	Y
	Sludge usage	257,544 tons/12cm	monthly	Y
	Fuel oil usage	291.5 gal/hr or 2.56MMgal/12cm	monthly	Y
	TDF usage	4,380 tons/12cm	monthly	Y
	Rice hulls usage	65,000 tons/12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
13	Opacity	40%	when using fuel oil	N
	Fuel oil usage	9.5MMgal/12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Highest hourly fuel oil usage	1,083 gal/hr	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
15	Opacity	40%	when using fuel oil	N

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
	Fuel oil usage	9.5MMgal/12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Highest hourly fuel oil usage	1,083 gal/hr	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
51	Chips consumed	2,726,294 tons/12cm	monthly	Y
22, 23, 44	Unbleached pulp production	676,262 ADTP/12cm	monthly	Y
52	Groundwood pulp production	81,111 ADTP/12cm	monthly	Y
Bleach Plant	Bleached kraft pulp production	620,135 ADTP/12cm	monthly	Y
	Inspection of enclosure openings	Defined in SC 65	monthly	N
	Inspection of reasonably accessible portions of the closed vent system	Defined in SC 66	monthly	N
55	Methanol throughput	1,400,212 gal/12cm	monthly	Y
53	Unfinished product production	189,800 tons/12 cm	monthly	Y
54	Unfinished product production	529,250 tons/12 cm	monthly	Y
28 through 40	Polyresin usage	90,000 tons/12cm	monthly	Y
	Fuel usage	Natural gas only	monthly	Y
41, 42	Fuel usage	Natural gas only	monthly	Y
02	Black liquor solids usage	296,964 Tbls/12cm	monthly	Y
	Fuel oil usage	5.06MMgal /12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
03	Black liquor solids usage	296,964 Tbls/12cm	monthly	Y
	Fuel oil usage	5.06MMgal /12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
04	Black liquor solids usage	805,482 Tbls/12cm	monthly	Y
	Fuel oil usage	16.45MMgal /12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
	ESP Operation	Defined in SC 139	monthly	N

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
09	Lime usage	82,125 tons CaO/12cm	monthly	Y
	Petcoke usage	7,800 tons/12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
10	Lime usage	82,125 tons CaO/12cm	monthly	Y
	Petcoke usage	7,800 tons/12cm	monthly	Y
	Types of fuel fired	various	monthly	Y
	Sulfur limit	1.0%	each shipment	Y
11&20	Lime usage	205,130 tons / 12cm	monthly	Y
49	Wastewater processed	2.5 MM/ hour or 13,870 MM/ 12cm	monthly	Y
	TRS Emission Reductions	At least 39 tons/yr	annual	Y
50	Pulp produced	757,373 ADTUBP/12cm	monthly	Y
57	Waste accepted	30,000 tons/12cm	monthly	Y
LVHC	NCG pre-scrubber bypassed hours	<500 hrs/yr	monthly	N
	NCG pre-scruber flow rate	>45 gal/min	daily	N
102 through 112	Conductivity	3000 μmhos	monthly	N
113	Propylene dichloride content	100 ppm	monthly	Y
114 through 119, 121, and 122	Opacity	20%	when in operation for more than 24 consecutive hours	N
	Hours of Operation	500 hours per calendar year	monthly	Y
120	Opacity	20%	when in operation for more than 24 consecutive hours	N
Plantwide	Plantwide emissions	PM: 1077.0 tpy PM_{10}: 768.3 tpy $PM_{2.5}$: 654.8 tpy NOx: 1458.1 tpy CO: 2041.1 tpy SO_2: 392.4 tpy VOC: 1936.2 tpy TRS: 844.3 tpy Lead: 0.690 tpy	monthly	Y

SN	Recorded Item	Limit (as established in permit)	Frequency	Report (Y/N)
		H_2SO_4: 17.07 tpy Fluorides: 3.016 tpy CO2e: 1969346.7 tpy		
01, 13, 15	All applicable NESHAP DDDDD records	See Plantwide Conditions #46 through #161	As necessary	N
01, 02, 03, 04	Used oil usage	Combined limit of 4.6 gal/hr or 40,150 gal/12cm	monthly	Y
07	CEMS measurements	Measurements of pressure drop and scrubbing liquid flow rate	Once each successive 15-minute period	Y

19. OPACITY:

SN	Opacity%	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism
01	40	pre-NSPS, pre-PSD limit from last permit	scrubber
13	40	pre-NSPS, pre-PSD limit from last permit	daily observations when burning fuel oil
15	40	pre-NSPS, pre-PSD limit from last permit	daily observations when burning fuel oil
28 through 40	5	natural gas fired	use of natural gas
41, 42	5	natural gas fired	use of natural gas
02	TBE	§63.862 alternative	COMS
03	TBE	§63.862 alternative	COMS
04	TBE	§63.862 alternative	COMS
06	40	pre-NSPS, pre-PSD limit from last permit	demister pad/scrubber
07	20	Reg.19.503	demister pad/scrubber
08	40	pre-NSPS, pre-PSD limit from last permit	demister pad/scrubber
09	40	pre-NSPS, pre-PSD limit from last permit	scrubber
10	40	pre-NSPS, pre-PSD limit from last permit	scrubber
11 & 20	20	limit from last permit	scrubber
114	20	Regulation 19 §19.503 and 40 CFR Part	daily observation

SN	Opacity%	Justification (NSPS limit, Dept. Guidance, etc)	Compliance Mechanism
through 122		52, Subpart E	

20. DELETED CONDITIONS:

Former SC	Justification for removal
PWC #31 and #37	SSM plan requirement has been removed from Subpart MM

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_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
IC Rental Engines	A-13	0.26	0.25	0.3	0.81	3.75		3.3E-03
Cotton Roll Grinder associated with Supercalendars	A-13	0.1						
Poly Silos associated with Extruders	A-13			1.27				
Wet Ash Handling	A-13	0.1						
Starch Silos	A-13	0.1						
ECO Latex Binder Storage Silo	A-13	0.13						
Liquid Dye Mix Tanks	A-13			1.33				0.276
Outside Media Blasting	A-13	0.99						5.2E-04
Bulk Tank O-3 (1,000 gal, underground)	A-13			6.3E-02				
Gasoline (279 gal)	A-13			8.1E-02				
A-13 TOTAL		1.68	0.25	3.044	0.81	3.75		0.277
Oil Bulk Tank F-1 (10,000 gal)	A-3			7.0E-05				
Oil Bulk Tank F-3 (6,000 gal)	A-3			4.0E-05				
Oil Bulk Tank F-4 (10,000 gal)	A-3			7.0E-05				
Diesel Fuel Bulk Tank H-1 (1,500 gal)	A-3			1.1E-03				

Source Name	Group A Category	Emissions (tpy)						
		PM/ PM_{10}	SO_2	VOC	CO	NO_x	HAPs	
							Single	Total
Bulk Tank K-1 (2,000 gal)	A-3			1.2E-03				
Bulk Tank O-1 (6,000 gal)	A-3			3.5E-03				
Bulk Tank O-2 (6,000 gal)	A-3			3.5E-03				
No. 1 Diesel (560.8 gal)	A-3			3.4E-04				
No. 2 Diesel (560.8 gal)	A-3			3.2E-04				
Hydraulic Oil (1,000 gal)	A-3			1.0E-05				
Used Oil (1,000 gal)	A-3			1.0E-05				
A-3 TOTAL				0.01				

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 #
0580-AOP-R15

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Evergreen Packaging, Inc.
Permit Number: 0580-AOP-R16
AFIN: 35-00016

$/ton factor	23.93	Annual Chargeable Emissions (tpy)	5960.846
Permit Type	Minor Mod	Permit Fee $	500

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)	-0.29
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 condensible 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		1077	1077	0	0	1077
PM_{10}		768.3	768.3	0		
$PM_{2.5}$		654.8	654.8	0		
SO_2		392.4	392.4	0	0	392.4
VOC		1936.2	1936.2	0	0	1936.2
CO		2041.1	2041.1	0		
NO_X		1458.1	1458.1	0	0	1458.1
Lead	☑	0.69	0.69	0	0	0.69

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
TRS	☑	844.3	844.3	0	0	844.3
2,4-Dinitrotoluene	☐	0.01	0.01	0		
4-Nitrophenol	☐	3.74E-04	3.74E-04	0		
Acetaldehyde	☐	50.2	50.2	0		
Acetophenone	☐	14.01	13.86	-0.15		
Acrolein	☐	2.67	2.67	0		
Bis(2-ethylhexyl)phthalate	☐	7.20E-03	7.20E-03	0		
Carbonyl sulfide	☐	20.03	19.99	-0.04		
Chlorine	☑	5.72	5.43	-0.29	-0.29	5.43
Chloromethane	☐	36.67	36.67	0		
Cresol	☐	21.43	21.14	-0.29		
Formaldehyde	☐	10.63	10.63	0		
Hexachlorobenzene	☐	4.14E-03	4.14E-03	0		
Hexachloroethane	☐	22.55	22.26	-0.29		
Hexane	☐	21.2	21.2	0		
Hydrochloric Acid	☑	79.46	79.46	0	0	79.46
Methanol	☐	2021.84	2021.84	0		
Pentachlorophenol	☐	1.46	1.46	0		
Phenol	☐	20.77	20.87	0.1		
Antimony	☐	0.16	0.16	0		
Arsenic	☐	0.08	0.08	0		
Beryllium	☐	3.61E-03	3.61E-03	0		
Cadmium	☐	0.05	0.05	0		
Chromium compounds	☐	0.16	0.16	0		
Cobalt	☐	0.25	0.25	0		
Manganese	☐	2.87	2.87	0		
Mercury	☐	5.53E-03	5.53E-03	0		
Phosphorus	☐	0.95	0.95	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Selenium	☐	0.11	0.11	0		
Polycyclic Organic Matter	☑	3.46	3.46	0	0	3.46
Fluorides	☑	3.016	3.016	0	0	3.016
Total Other HAPs	☐	43.21	43.26	0.05		
Sulfuric Acid	☐	17.07	17.07	0		
Acetone	☑	57.3	57.3	0	0	57.3
Ammonia	☑	102.39	102.39	0	0	102.39
Chlorine Dioxide	☑	1.1	1.1	0	0	1.1
H2S	☐	476.72	477.59	0.87		
Methyl Ethyl Ketone	☐	14.23	14.23	0		
Barium	☐	0.24	0.24	0		
Zinc	☐	18.14	18.14	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
	☐	0	0	0		
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