

PERMIT TO OPERATE

NCU 037-12

LOUISIANA-PACIFIC SAMOA
SAMOA, CA

JUNE 19, 2000

NORTH COAST UNIFIED
AIR QUALITY
MANAGEMENT DISTRICT

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NORTH COAST UNIFIED AIR QUALITY MANAGEMENT DISTRICT

PERMIT TO OPERATE

NCU 037-12

LOUISIANA-PACIFIC SAMOA, INC.

LEGAL OWNER OR OPERATOR: Louisiana-Pacific Samoa, Inc.
PO Box 218
Samoa, CA 95564
Responsible Official: Pulp Mill Manager
Plant Contact: Environmental Manager
707/443-7511

BUSINESS ACTIVITY: Kraft pulp mill

EQUIPMENT LOCATED AT: The plant is located in the northwestern portion of California within the County of Humboldt and on the Samoa Peninsula near the town of Samoa which is across Humboldt Bay from the City of Eureka the County seat.

Whereas a timely application for a Permit to Operate has been made by Louisiana-Pacific Samoa, Inc.(hereinafter called the Permittee) pursuant to Regulation 5 (implementation of federal Title V operating permits) of the Rules and Regulations of the North Coast Unified Air Quality Management District (hereinafter called the District), and said application has been reviewed and found complete by the Air Pollution Control Officer of said District (hereinafter referred to as the Control Officer or NCUAQMD).

Unless otherwise noted, all requirements in this PERMIT are federally enforceable.

This is your Permit to Operate (hereinafter called PERMIT) subject to the following terms and conditions:

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LIST OF ABBREVIATIONS

adtpd	air dried tons pulp per day
adtp	air dried tons pulp
Administrator	Administrator of the Environmental Protection Agency
Act	Clean Air Act
tbls	ton black liquor solids
CARB	California Air Resources Board
CEMS	continuous emissions monitoring system
CMS	continuous monitoring system
CFR	Code of federal regulations
CO	carbon monoxide
COMS	continuous opacity monitoring system
CO ₂	carbon dioxide
dscf	dry standard cubic foot
deg. F	degrees Fahrenheit
District	North Coast Unified Air Quality Management District
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
g/dscm	grams per dry standard cubic meter
gr/acf	grains per actual cubic foot
gr/dscf	grains per dry standard cubic foot
HVLC	high volume low concentration
LVHC	low volume high concentration
lbs/hr	pounds per hour
MMBtu	million British thermal units
NCASI	National Council of the Pulp and Paper Industry for Air and Stream Improvement
NCGs	noncondensable gases
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O ₂	oxygen
pH	hydrogen ion concentration in a solution
ppmv	parts per million by volume
PSD	Prevention of Significant Deterioration
SOG	stripper off gas
TCF	totally chlorine free
tpy	tons per year
TRS	total reduced sulfur
UBK	Unbleached kraft pulp
unit	single emissions unit
VEE	visible emission evaluation

PERMIT UNITS

(1) Permit Number - NP-072(Pulp Mill)

Name - Recovery Boiler

I. **BASIC EQUIPMENT** - The permittee operates an A. Ahlstrom Corporation 3 million pounds per day of black liquor solids recovery furnace for recovery of pulp mill process chemicals and generation of steam for mill processes. The furnace burns black liquor at approximately 70% solids content. The furnace also has startup and load carrying burners that combust natural gas. The startup burners are rated at 144 million Btu/hr heat input while the two load carrying low-NOx burners are rated at 288 million Btu/hr heat input.

II. **CONTROL EQUIPMENT** - Particulate matter is controlled with an electrostatic precipitator manufactured by Environmental Elements. The unit has two parallel chambers with three fields in each chamber and a total plate area of 153,648 sq.ft. Plates are cleaned by mechanical rapping and gravity feed to discharge hoppers. The material in the hoppers is mechanically conveyed to the salt cake mix tank. The control of sulfur dioxide is accomplished by high black liquor solids firing at normal liquor flows which sustain normal smelt bed height and temperatures. Nitrogen oxides are controlled while firing natural gas with the use of the Low-NOx burners while combustion controls are utilized while firing black liquor.

III EMISSIONS LIMITATIONS

A. Particulate Matter

1. **Particulate loading** - The permittee shall not discharge into the atmosphere particulate matter in excess of 0.025 grains per standard cubic foot of exhaust gas corrected to 8 percent oxygen[This is a streamlined permit condition which accounts for District SIP Rule 420(c) approved 10/31/80, NSPS 40 CFR 60.282 and District Authority to construct dated 1/22/91].

2. **Visible emissions** - The permittee shall not discharge into the atmosphere particulate matter which exhibits an opacity of 20 percent or greater on a six minute average basis[This is a streamlined permit condition which accounts for District SIP Rule 410(a) approved 10/31/80, NSPS 40 CFR 60.282 and District Authority to construct dated 1/22/91].

a. This limitation does not apply during periods of startup or shutdown, or during a breakdown condition. Startup and shutdown shall be defined for this emission limitation as those periods of time when black liquor is not being fired in the furnace[Regulation 1, Rule 410(d)].

B. **Total Reduced Sulfur** - The permittee shall not discharge into the atmosphere total reduced sulfur(calculated as H₂S) in excess of 3 ppmv corrected to 8% oxygen and reported as two 12-hr averages per 24 hour period[This is a streamlined permit condition which accounts for District SIP Rule 57 approved 9/22/72, NSPS 40 CFR 60.283 and District Authority to construct dated 1/22/91].

a. This limitation does not apply during periods of startup or shutdown, or during a breakdown condition. Startup and shutdown shall be defined for this emission limitation as the 12-hour period following the introduction of black liquor into the boiler[Regulation 1, Rule 240(d)].

C. Sulfur Dioxide -

1. The permittee shall not discharge into the atmosphere sulfur dioxide in excess of 50 ppmv corrected to 8% oxygen and reported as two 12-hr averages per 24 hour period[District Authority to construct dated 1/22/91].

a. This limitation does not apply during periods of low liquor flow or smelt bed height due to a planned shutdown or startup, or during a furnace or mill breakdown condition which would create low liquor flow or smelt bed height conditions. Liquor flows of less than 180 gpm shall be considered low flows for the purpose of this section[Regulation 1, Rule 240(d)].

2. General Provisions section L.4[SIP rule adopted 8/2/78].

- D. **Carbon Monoxide** - The permittee shall not discharge into the atmosphere carbon monoxide in excess of 250 ppmv corrected to 8% oxygen and reported as two 12-hr averages per 24 hour period[Authority to construct, dated 1/22/91].
- a. This limitation does not apply during periods of startup or shutdown, or during a breakdown condition. Startup and shutdown shall be defined for this emission limitation as the 12-hour period following the introduction of black liquor into the boiler[Regulation 1, Rule 240(d)].
- E. **Nitrogen Oxides** - The permittee shall not discharge into the atmosphere nitrogen oxides (calculated as nitrogen dioxide) in excess of[EPA PSD permit issued April 12, 1999]:
1. Under normal operating conditions:
 - a. When firing black liquor solids exclusively or in combination with natural gas, 78 ppmv corrected to 8% oxygen and reported as two 12-hr averages per 24 hour period;
 - b. When firing natural gas exclusively, 62 ppmv corrected to 8% oxygen and reported as two 12-hr averages per 24 hour period.
 2. Transient mode(natural gas only), 40 lbs/hr on a 3 hr average.

For the purposes section E, Nitrogen Oxides, transient mode is defined as the period of time immediately following a boiler startup or shutdown that is required to perform safety and operational tests necessary to ensure proper performance of the furnace. This timeframe shall not exceed 24 hours and does not include periods of time when black liquor solids are being fired in the furnace[EPA PSD permit dated April 12, 1999].

IV. COMPLIANCE MONITORING

A. The following methods shall be used for determining compliance with the above emissions limitations:

1. **Particulate Matter** - CARB Method 5. The permittee shall be required to have particulate matter from the furnace tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District[Regulation 1, Rule 240(h)].
2. **Visible Emissions** - The permittee shall operate and maintain a continuous opacity monitoring system(COMS)[40 CFR 60.48b(a)].
 - a. 40 CFR 60, Appendix B, Performance Specification 1 shall be the basis for the operation of the COMS[40 CFR 60.49b(b)].
 - b. A hot stack zero and alignment of the COMS shall be conducted during startups which occur after planned shutdowns while the furnace is being fired on natural gas prior to the introduction of black liquor into the furnace[Regulation 1, Rule 240(d)].
3. **Total Reduced Sulfur, Sulfur Dioxide, Carbon Monoxide, Nitrogen Oxides** - The permittee shall operate, maintain and calibrate daily a continuous emissions monitoring system(CEMS) for the determination of total reduced sulfur, sulfur dioxide, carbon monoxide, and nitrogen oxides from the furnace. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and RATA requirements of Appendix F, Quality Assurance Procedures[[Authority to construct, dated 1/22/91 and for NOx specifically, EPA PSD permit dated April 12, 1999].

B. All CEMS and COMS shall be in full operation while either natural gas and/or black liquor is being fired in the furnace[Regulation 1, Rule 240(d)].

C. The permittee shall maintain and operate instrumentation to measure black liquor and natural gas flows into the furnace[EPA PSD permit dated April 12, 1999].

D. For all gaseous emissions, if any 12 hr period contains missing CEMS data, the 12-hr block average shall be calculated using all available CEMS data points, averaged over the time period represented by those data[Regulation 1, Rule 240(d); EPA PSD permit dated April 12, 1999].

V. REPORTING AND RECORDKEEPING - see General Provisions, section F.

A. The permittee shall maintain data on the operation of the furnace which shall include the black liquor solids firing rate, steam flow, steam temperature, natural gas firing rate, and hours in transient mode[Regulation 1, Rule 240(d)].

B. The permittee shall report all occurrences of excess emissions from the furnace to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown[Regulation 1, Rule 240(d)].

C. For NOx emissions only, the permittee shall notify the EPA, Region IX, Director of the Air Division within 48 hours following any failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in section III.E for this permit unit. A follow-up report shall be made to the Director within 15 days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure, the cause of the failure, the estimated resultant emissions in excess of those allowed, and the methods utilized to restore normal operations[EPA PSD permit dated April 12, 1999].

D. A quarterly report related to NOx emissions only shall be submitted to the EPA, Region IX for every calendar quarter. This report shall include the following[EPA PSD permit dated April 12, 1999]:

1. The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), and conversion factors used, and the date and time of commencement and completion of each time period of excess emissions.
2. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of the furnace systems. The nature and cause of any malfunction (if known) and the corrective action taken or preventive measures adopted shall also be reported.
3. The date and time identifying each period during which the continuous monitoring system was inoperative, repaired, or adjusted. Such information shall be stated in the report.
4. When no excess emissions have occurred or the continuous monitoring system has not been inoperative, repaired, or adjusted, such information shall be stated in the report.
5. Excess emissions shall be defined as any 12 hour period during which the average emissions of NOx, as measured by the CEMS, exceeds the emission limits set forth in section III.E for this permit unit.
6. The report shall include a summary report form in accordance with 40 CFR 60.7(d).

The monthly report submitted to the District will be deemed equivalent for the purpose of a quarterly report submittal to the District.

E. The permittee shall demonstrate compliance with Section III.E.1.b. for this permit unit by submitting to the EPA, Region IX within 60 days after an annual startup, CEMS data which demonstrates compliance with the emission limit[EPA PSD permit dated April 12, 1999].

VI. OPERATING CONDITIONS - see General Provisions, section C.

A. The furnace shall not be operated at a firing rate which exceeds a calendar monthly average of 3,000,000 pounds per day of black liquor solids[Authority to construct dated 1/22/91].

B. While the furnace is firing liquor, the permittee shall continuously operate and maintain the control equipment described in section II of this permit unit in a condition which can be assured to control particulate matter emissions to within permitted limits[Authority to construct dated 1/22/91].

C. At all times, including periods of startup, shutdown, and malfunction, the permittee shall maintain and operate the furnace (including associated air pollution control equipment: electrostatic precipitator; overfire air systems; low NOx burners systems) in a manner consistent with good air pollution control practices for minimizing emissions[EPA PSD permit dated April 12, 1999; Regulation 1, Rule 240(d)].

(2) Permit Number - NP-073(Pulp Mill)

Name - Lime Kiln

I. **BASIC EQUIPMENT** - The permittee operates a rotary lime kiln manufactured by Traylor Engineering and Manufacturing Company. The kiln measures 10 feet in diameter by 270 feet in length. The following lime mud impurity reduction systems are a part of the lime production process: (1) A green liquor filtration system consisting of a Green Liquor Filter(X-filter) and a dregs precoat filter; (2) Mud washing for removal of sulfide impurities from the mud; and (3) Mud precoat filtration for reduction of mud moisture content and impurities prior to introduction of the mud (calcium carbonate) into the kiln.

II. **CONTROL EQUIPMENT** - Particulate matter is controlled with a venturi scrubber manufactured by Chemical Construction Corporation.

III. **EMISSIONS LIMITATIONS**

A. **Particulate Matter**

1. **Particulate loading** - The permittee shall not discharge into the atmosphere particulate matter in excess of 0.20 grains per standard cubic foot of exhaust gas corrected to 10 percent oxygen or 1.0 pounds per ton of kraft pulp mill production, whichever is the more restrictive condition[This is a streamlined permit condition which accounts for District SIP Rule 420(d) approved 10/31/80, and District Regulation 1, Rule 420(d)(2) adopted on 1/19/89].

2. **Visible emissions** - see General Provisions, section L.

B. **Total Reduced Sulfur** - The permittee shall not discharge into the atmosphere TRS(calculated as H₂S) in excess of 20 ppmv or 0.10 pounds of TRS per ton of kraft pulp production as a daily arithmetic average, whichever is the more restrictive condition. The 0.10 pounds of TRS per ton of pulp portion of this limitation is only applicable when the following applies: Pulp production, TCF > 550 adtpd, UBK >600 adtpd and mud flow to precoats > 210 gpm[This is a streamlined permit condition which accounts for District SIP Rule 57 approved 9/22/72, and District Regulation 1, Rule 450(b)].

C. **Sulfur Dioxide** - The permittee shall not discharge into the atmosphere sulfur dioxide in excess of 12.3 pounds per hour, average of three one-hour averages from both the lime kiln and incinerator[Authority to Construct issued 10/18/93 and subsequent revisions].

IV. **COMPLIANCE MONITORING**

A. The following methods shall be used for determining compliance with the above emissions limitations:

1. **Particulate Matter** - CARB Method 5 or other EPA approved method.

The permittee shall be required to have particulate matter from the kiln tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District. Testing is to be done during normal operating conditions where normal means: pulp production, TCF > 550 adtpd, UBK >600 adtpd and mud flow to precoats > 210 gpm[Regulation 1, Rule 240(d)].

2. **Visible Emissions** - No periodic monitoring is required of this source[Regulation 1, Rule 240(d)].

3. **Total Reduced Sulfur** - Federal Method 16B. While the kiln is processing mud, the permittee shall operate and maintain a continuous emissions monitoring system(CEMS) for the determination of total reduced sulfur from the kiln. The CEMS shall be operated in conformance with 40 CFR, Part 60, Appendix B, Performance Specifications, and RATA requirements of Appendix F, Quality Assurance Procedures. A modification to Method 16B is allowed using an ultraviolet fluorescence sulfur analyzer[Regulation 1, Rule 240(d)].

4. **Sulfur Dioxide** - No compliance testing is required of this source[Regulation 1, Rule 240(d)].

V. **REPORTING AND RECORDKEEPING** - see General Provisions, section F.

A. The permittee shall continuously record and maintain data on the operation of the kiln which shall include the firing temperature, mud flow, scrubbing liquid flow and natural gas flow[Regulation 1, Rule 240(d)].

B. The permittee shall maintain records of the hourly, daily and monthly averages for total reduced sulfur from the kiln[Regulation 1, Rule 240(d)].

C. The permittee shall report all occurrences of excess emissions from the kiln to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown[Regulation 1, Rule 240(d)].

VI. OPERATING CONDITIONS - see General Provisions, section C.

A. The permittee shall continuously operate and maintain a venturi scrubber on the exhaust of the kiln while the kiln is in operation[Regulation 1, Rule 240(d)].

B. The venturi scrubber flow shall be maintained at a minimum flow of 120 gpm, three hour average[Regulation 1, Rule 240(d)].

(3) Permit Number - NP-074(Pulp Mill)

Name - Smelt Dissolver

I. **BASIC EQUIPMENT** - A 50,000 gallon tank manufactured by A. Ahlstrom used to dissolve recovery furnace smelt in water to form green liquor.

II. **CONTROL EQUIPMENT** - Wet scrubber containing a five foot section of structured packing and followed by a six inch chevron demister section. Spray nozzles are located downstream of the packing which provides a continuous spray of weak wash down upon the packing. An additional set of nozzles located upstream sprays water into the demister section for cleaning periodically. The alkaline weak wash solution is used to aid in the control of total reduced sulfur.

III. **EMISSIONS LIMITATIONS**

A. **Particulate Matter**

1. **Particulate loading** - The permittee shall not discharge into the atmosphere particulate matter in excess 0.20 pounds per ton of black liquor solids[This is a streamlined permit condition which accounts for District SIP Rule 420(d) approved 10/31/80, NSPS 40 CFR 60.282 and District Authority to construct dated 1/22/91].

2. **Visible emissions** - See General Provisions section L.

B. **Total Reduced Sulfur** - The permittee shall not discharge into the atmosphere total reduced sulfur(calculated as H₂S) in excess of 0.0168 pounds per ton of black liquor solids calculated on a dry basis[This is a streamlined permit condition which accounts for District SIP Rule 57 approved 9/22/72, NSPS 40 CFR 60.283 and District Authority to construct dated 1/22/91].

IV. **COMPLIANCE MONITORING**

A. The following methods shall be used for determining compliance with the above emissions limitations:

1. **Particulate Matter** - CARB Method 5. The permittee shall be required to have particulate matter from the dissolver tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District[Regulation 1, Rule 240(h)].

2. **Visible Emissions** - No periodic monitoring is required of this source[Regulation 1, Rule 240(d)].

3. **Total Reduced Sulfur** - Federal Method 16B. A modification to this method is allowed for the use of a ITT Barton Titrator or an ultraviolet fluorescence sulfur analyzer in accordance with NCASI Technical Bulletin # 89[District Regulation 1, Appendix B adopted on 12/5/84]. The permittee shall be required to have TRS from the dissolver tested once per calendar year. If the compliance test result is less than one-half the permitted limit, then the next year compliance test may be waived by the District [Regulation 1, Rule 240(d)].

V. **REPORTING AND RECORDKEEPING** - see General Provisions, section F.

A. Flow rates from the spray nozzles for the structured packing shall be recorded continuously[Regulation 1, Rule 240(d)].

VI. **OPERATING CONDITIONS** - see General Provisions, section C.

A. The permittee shall maintain the following scrubber operating parameters as specified[Regulation 1, Rule 240(d)]:

1. Weak wash liquid to the spray nozzles located in the scrubber for the structured packing section - 560 gpm minimum three hour basis;

2. Demister section sprays shall be set to operate at least every eight hours.

B. All smelt dissolving tank emissions shall be directed through the scrubber at or above minimum scrubber flow rates except when necessary for the maintenance of scrubber spray nozzles, scrubbing liquid pumps or other scrubber related equipment items provided such maintenance does not exceed 3 hours in length. Any maintenance requiring a longer length of time shall be reported to the District in accordance with Rule 540[Regulation 1, Rule 240(d)].

(4) Permit Number - NP-075(Pulp Mill)

Name - Noncondensable Gas System

I. BASIC EQUIPMENT - The permittee operates a Kraft pulp mill with the following mill processes:

Noncondensable Gas (NCG) System Consisting of:

A. High Volume Low Concentration(HVLC) System which handles noncondensable gases from the following sources:

1. Brown stock washer spill tank.
2. Brown stock washer filtrate tanks.
3. LTV evaporator process sewer manhole #7.

B. Low Volume High Concentration(LVHC) System which handles noncondensable gases from the following sources:

1. Digester and digester flash tanks.
2. Digester blow tank.
3. Multiple effect evaporator and evaporator seal tank.
4. Turpentine decanter.
5. Black liquor concentrator and concentrator seal tank.
6. Foul condensate storage tank.
7. Foul Condensate Steam Stripper System consisting of:
 - a. Steam Stripper Column.
 - b. Foul Condensate Storage Tank.
 - c. Stripped Condensate Heat Exchanger.
 - d. Steam Generator.
 - e. Trim Condenser.
 - f. Foul Condensate Preheater.
 - g. Turpentine Decanter.

II. CONTROL EQUIPMENT

Noncondensable Incineration System - The NCG system consists of two separate closed-vent piping networks which capture, transport, and condition the NCGs for incineration. The incineration systems consist of the following:

A. Noncondensable gas incinerator.

1. Wet scrubber which utilizes an alkaline solution of sodium hydroxide as a scrubbing liquid for the control of sulfur dioxide.
2. The incinerator is operated at high temperatures for the oxidation of organic compounds including but not limited to total reduced sulfur and methanol.

B. Lime kiln - The high temperature environment of the lime kiln is sufficient to oxidize organic compounds including but not limited to total reduced sulfur and methanol. The lime developed in the kiln also provides an environment for the chemical scrubbing of any sulfur dioxide resulting from the TRS oxidation.

C. Backup flare - The flare burns natural gas and is used in case both the NCG incinerator and lime kiln are down due to malfunction conditions.

III. EMISSIONS LIMITATIONS

A. Emissions limitations as a result of this permit are as follows:

1. Sulfur dioxide - 12.3 pounds per hour, average of three one-hour averages total from both the lime kiln and incinerator[Authority to Construct issued 10/18/93 and subsequent revisions].
2. Total reduced sulfur(as H₂S)
 - a. Incinerator - 5 ppmv, average of three one-hour averages[Regulation 1, Rule 450(d)].
 - b. Lime kiln - 20 ppmv, daily 24-hr. average[Regulation 1, Rule 450(b)].

B. All HVLC and LVHC processes as indicated in section I, Basic Equipment, shall be enclosed and vented at all times to the control system as described in section II, Control Equipment[40CFR 63.443(c)]. Venting may only be allowed during startup, shutdown or as a malfunction condition when details are furnished to the District as explained in Section V.A. and Rule 540

of Regulation 1, and the condition qualifies as a malfunction in accordance with District breakdown/malfunction policy.

- C. Condensates from the equipment items in section I, Basic Equipment, shall be treated according to one of the following options: [40 CFR 63.446(c)]
1. Treat the entire volume of condensates or,
 2. Treat condensates from the digester, turpentine recovery and weak liquor evaporators that in total contain at least 65% of the total HAP mass, plus the condensates from the HVLC and LVHC collection systems or,
 3. Treat condensates from all equipment items in section I that in total contain a HAP mass of 11.1 pounds per ton of oven dried bleached pulp and 7.2 pounds per ton of oven dried unbleached pulp.

The condensates shall be treated by either recycling to a controlled piece(s) of process equipment in section I, or by steam stripping.

- D. Steam stripping shall meet one of the following requirements: [40 CFR 63.446(e)]
1. Reduce the total HAPS by at least 92 percent or more or,
 2. Remove 6.6 pounds of HAPS per ton of oven dried pulp during unbleached pulping operations and 10.2 pounds of HAPS per ton of oven dried pulp during bleached pulping operations.
- Periods of treatment that do not meet either of these requirements shall not be a violation provided that the time of noncompliance (including periods of startup, shutdown, or malfunction) divided by the total stripper operating time in a semi-annual reporting period does not exceed 10 percent [40 CFR 63.446(g)].

- E. The foul condensate storage tank used in the closed collection system shall be: (1) designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background and (2) vented to the control equipment [40 CFR 63.446(d)(2)].

IV. COMPLIANCE MONITORING

The following methods shall be used for determining compliance with the emissions limitations contained in section III:

- A. The permittee shall be required to have sulfur dioxide from the incinerator tested once per permit term using CARB Method 100 utilizing a UV fluorescence analyzer or an equivalent EPA Method. [Regulation 1, Rule 240(d)].
- B. The permittee shall be required to have total reduced sulfur from the incinerator tested once per permit term using CARB Method 100 modified for SO₂ analysis utilizing a scrubber for sulfur dioxide removal, an oxidation oven operated at 800 °C or higher and a UV fluorescence analyzer or an equivalent EPA Method [Regulation 1, Rule 240(d)].
- C. The closed-vent system specified in section II, Control Equipment shall meet the following requirements:
1. For each closed-vent system which vents a process equipment emission point that is being collected for incineration, the permittee shall operate and maintain a computer controlled system which will record the pressure and temperature in the closed-vent system [Regulation 1, Rule 240(d)].
 2. For each duct which allows the bypass of exhaust gases to the atmosphere, the permittee shall operate and maintain a computer controlled system which will monitor and record exhaust gas flow in the bypass duct in accordance with section V.B.4 and VI.G [40 CFR 63.450(d)(1)].
 3. Each enclosure and closed-vent system and each condensate closed collection system shall be visually inspected by the permittee every 30 days and at other times as requested by the District or Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects [40 CFR 63.453(k)(2) and 40 CFR 63.453(l)].
 - a. For condensate drain systems, the permittee shall inspect the individual drain system in accordance with the requirements of 40 CFR 63.964(a)(1) of subpart RR [40 CFR 63.453(l)].
- D. The permittee shall calibrate, certify and continuously operate a monitoring and recording system which measures the steam stripper foul condensate feed rate, steam feed rate and foul condensate column feed temperature [40 CFR 63.453(g)].
- E. The permittee shall monitor every 30 days the foul condensate storage tank and stripper system for leaks in accordance with 40 CFR 63.457(d) [40 CFR 63.446(d)(2)(l)].

V. REPORTING AND RECORDKEEPING

A. Reporting Requirements

1. Startup, Shutdown, and Malfunction Reporting - The Permittee shall notify the District regarding malfunction conditions such as follows in accordance with District Regulation 1, Rule 540:

- a. Venting of noncondensable gases to the atmosphere from any noncondensable gas handling system not specifically identified elsewhere in this section.
- b. Failure of both primary incineration systems (incinerator and lime kiln) which requires the venting of noncondensable gases to the backup flare in excess of the allowances provided in section VI.N. of this permit.
- c. Failure of all incineration systems (incinerator, lime kiln, and backup flare) which requires the venting of uncontrolled noncondensable gases to the atmosphere.
- d. Failure of the sulfur dioxide wet scrubber on the incinerator which includes inadequate scrubbing liquid flow, low pH values not within the limits of this permit, or pH controller problems.
- e. Incineration of all HVLC and LVHC gases in the lime kiln, or incineration of these gases under an operating scenario differing from "normal" as defined by this permit, shall require approval by the District prior to incineration. Incineration under conditions other than "normal" operation that is due to an equipment malfunction does not require prior approval [Regulation 1, Rule 240(d)].
- f. If an inspection required under section IV.C: (1) identifies visible defects in ductwork, piping, enclosures or connections to covers; or (2) if enclosure openings are not maintained at negative pressure; or (3) if monitoring as required by section IV.E detects a level of gas greater than allowed by section III.E or VI.D, then (i) an effort to repair or correct the problem shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; (ii) the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delays in corrective action or repairs beyond 15 calendar days are allowed as authorized by the District where the corrective actions or repairs are technically infeasible without a process unit shutdown or where the emissions resulting from immediate repair would be greater than the emissions likely to result from delaying the repair [40 CFR 63.453(k)&(l)].
- g. Operation of the steam stripper outside of the parameters contained in section VI.C except as allowed by section III.D shall be reported to the District [Regulation 1, Rule 240(d)].
- h. The permittee shall report all occurrences of excess emissions to the District in accordance with the timing requirements of Regulation 1, Rule 540, Equipment Breakdown [Regulation 1, Rule 240(d)].
- i. Venting from P/V vents that meet the following conditions shall be reported in accordance with Regulation 1, Rule 540 [Regulation 1, Rule 240(d)]:
 - a. LVHC system venting more than 2 minutes total per day determined from the 24 hour period of midnight to midnight.
 - b. HVLC system venting more than 15 minutes total per day determined from the 24 hour period of midnight to midnight.

Venting for periods less than the above shall be recorded and maintained but are not required to be reported to the District in accordance with Regulation 1, Rule 540.

2. Startup, Shutdown, and Malfunction Plan - The permittee shall maintain current, and implement a written plan that describes in detail the procedures for operating and maintaining the basic and control equipment in this permit unit during periods of startup, shutdown, and malfunction. The plan will also provide for corrective action for malfunctioning basic and control equipment in this permit unit. The plan must be re-approved by the District upon any changes [40 CFR 63.6(e)(3)].

3. Any actions taken by the permittee during a startup, shutdown or malfunction (including actions taken to correct a malfunction) that are not consistent with the procedures specified in the "Plan", shall be reported to the District by telephone within 2 working days after such actions followed by written confirmation within 7 working days of such actions. The written confirmation shall explain the circumstances of the event and reasons for not following the procedures in the "Plan" [40 CFR 63.10(d)(5)].

B. Recordkeeping Requirements

1. The combustion temperature in the incinerator shall be continuously recorded in a format which will allow for identification of date, time and temperature[Regulation 1, Rule 240(d)].
2. The pH, flow and level of the scrubbing liquid in the scrubber controlling the sulfur dioxide from the incinerator shall be monitored and recorded continuously[Regulation 1, Rule 240(d)].
3. Alarms associated with the venting to the atmosphere of noncondensable gases from the Noncondensable Gas System shall be recorded and all data maintained on site for inspection[Regulation 1, Rule 240(d)].
4. For each enclosure opening associated with the basic equipment, closed-vent system, and condensate closed collection system, the permittee shall prepare and maintain an inspection plan including a drawing or schematic of the components of the systems and shall record the following information for each inspection[40 CFR 63.454(b)]:
 - a. Date of inspection;
 - b. The equipment type and identification;
 - c. The nature of the defect or leak and the method of detection;
 - d. The date of each attempt to repair the defect or leak;
 - e. Repair methods applied in each attempt to repair the defect or leak;
 - f. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
 - g. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
 - h. The date of successful repair of the defect or leak; and
 - i. The duration of opening of bypass line valves.

VI. OPERATING CONDITIONS

- A. The closed-vent system portion which is operated under pressure prior to the incineration device shall be operated with no detectable leaks[40 CFR 63.450(c)].
- B. Any condensates from the basic equipment listed in this permit shall be conveyed in a "condensate closed collection system" [63.446(d)].
 1. The closed collection system shall meet the individual drain system requirements specified in 40 CFR 63.960, 40 CFR 63.961, and 40 CFR 63.962 of subpart RR[40 CFR 63.446(d)(1)].
 2. Each opening in the foul condensate storage tank shall be maintained in a closed, sealed position at all times that the tank contains pulping process condensates except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair[40 CFR 63.446(d)(2)]
- C. Operation of the steam stripper within the following operating parameters shall be deemed to provide compliance with section III.D of this permit unit[40 CFR 63.453(o)]:
 1. A steam flow to condensate flow ratio (lbs/lbs) of 18% or greater as a daily average shall be required during unbleached pulping operations.
 2. A steam flow to condensate flow ratio (lbs/lbs) of 22% or greater as a daily average shall be required during bleached pulping operations. This ratio will be revised to 21% provided the permittee supplies additional methanol input rates test data during bleached pulping operations which shows that input rates are at least 1600 mg/l.The condensate feed temperature will be continuously monitored and the permittee will operate a heat exchanger to maintain normal condensate feed temperatures. All rates are to be determined on a daily average basis.
- D. No spillage, storage, transport or handling of foul condensate shall be permitted which would allow the vapors from the condensate to vent to the ambient air. Any overflow from the foul condensate storage tank shall be directed to a sealed sewer or weak liquor tank[Regulation 1, Rule 240(d)].
- E. Should both the lime kiln and incinerator become incapable of combusting the gases from the stripper according to design then the stripper shall be automatically shutdown by eliminating steam and foul condensate to the stripper[Regulation 1, Rule 240(d)].
- F. The following condition shall define "normal" combustion of the HVLC and LVHC gases[Regulation 1, Rule 240(d)]:

- a. Following collection and moisture removal, the HVLC and LVHC gases shall be combusted in the lime kiln or in the incinerator at an hourly average temperature greater than 1675 °F, and
 - b. The majority of the stripper exhaust gases are being combusted in the incinerator.
- G. Bypass vents shall be monitored by a controller and if any vent opens, an alarm will note which vent is open so that appropriate corrective action can take place to close the pressure/ vacuum vent[Regulation 1, Rule 240(d)].
- H. Gases from the HVLC, and LVHC will be combusted in either the incinerator, lime kiln or both[Regulation 1, Rule 240(d)].
- I. Hourly average combustion temperatures in the lime kiln and incinerator shall be at least 1675°F while combusting noncondensable gases[Regulation 1, Rule 240(d)].
- J. The incinerator wet scrubber used for the control of sulfur dioxide emissions shall be in operation at all times during the combustion of noncondensable gases. The scrubbing liquid shall consist of a solution of sodium hydroxide with the pH of the recirculated scrubbing liquid from the outlet of the scrubber maintained no lower than 6.75 as a 3-hour average[Regulation 1, Rule 240(d)].
- K. The lime kiln shall be fully operational and processing calcium carbonate at normal rates and temperatures prior to the combustion of any noncondensable gases[Regulation 1, Rule 240(d)].
- L. Turpentine from mill processes may be combusted in the lime kiln[Regulation 1, Rule 240(d)].
- M. Should either the lime kiln or the incinerator become incapable of combusting the HVLC or LVHC gases then the backup flare shall be placed in a standby mode with burners on low fire preheat. The backup flare shall be maintained in this mode until both the lime kiln and incinerator systems are in operation and combusting noncondensable gases[Regulation 1, Rule 240(d)].
- N. Should both the lime kiln and incinerator become incapable of combusting the HVLC or LVHC gases then the LVHC gases will be vented through the fully operating backup flare for combustion prior to release to the main stack, the HVLC gases will be exhausted to the atmosphere, and the Foul Condensate Steam Stripper system shall be shutdown. The use of the backup flare is allowed for a total time of no more than 12 hours in any one day while both the lime kiln and incinerator are out of service for repair. Once the backup flare operation combusting NCGs has reached 12 cumulative hours time in a day, immediate shutdown of mill processes which produce noncondensable gases shall be required. HVLC gases are allowed to be vented to the atmosphere in excess of the allowances provided in Section III.B. only while the backup flare is in use and the lime kiln and incinerator are non-operational[Regulation 1, Rule 240(d)].

I. BASIC EQUIPMENT

A. Pulping Processes

1. Two brown stock washers;
2. Two secondary knotters;
3. One decker system including the decker hood and decker filtrate tank;
4. One unscreened stock chest;
5. One oxygen delignification blow tank.

B. Liquor Storage Processes

1. Three weak black liquor storage tanks;
2. One intermediate black liquor storage tank;
3. Two strong black liquor storage tanks;
4. One black liquor spill collection tank;
5. One 70% black liquor storage tank.

C. Recovery Processes

1. One salt cake mix tank.

II. CONTROL EQUIPMENT

All exhaust vents from the above processes are collected and transported in a closed-vent system to the tertiary combustion air inlet of the recovery furnace for incineration. Ductwork is stainless steel and a water cooled condenser provides for moisture removal prior to incineration[40 CFR 63.443(d)(4)]. The recovery furnace control system may be bypassed to the main stack for periods of time as allowed by this permit in section III.

III EMISSIONS LIMITATIONS

A. All Pulping Processes, Liquor Storage Processes, and Recovery Processes as indicated in section I, Basic Equipment, shall be enclosed and vented at all times to the control system as described in section II, Control Equipment with the following exceptions[40 CFR 63.443(a)(1)] & [40 CFR 63.443(d)(4)].

1. The bypass vent to the main stack from the recovery furnace may be utilized(excluding periods of startup, shutdown, or malfunction) for a period of time expressed as a percentage of the total recovery furnace operating time in a semi-annual reporting period of not more than one percent. Venting in excess of the one percent requirement shall not be considered as a violation provided the permittee prepares a Quality Improvement Plan(QIP) for approval by the District which specifies the measures to be taken to bring the venting back to within the allowable one percent maximum[Regulation 1, Rule 230(d)].
2. The bypass vent to the main stack from the recovery furnace may be utilized(excluding periods of startup, shutdown, or malfunction) for a period of time expressed as a percentage of the total recovery furnace operating time in a semi-annual reporting period of not more than four percent. Venting in excess of the four percent requirement as well as, if the approved QIP is not actively pursued or implemented, shall be a violation[40 CFR 63.443(e)(2)].
3. Venting from safety relief vents on the liquor storage tanks described in Section I.B., Liquor Storage Processes, shall be allowed as follows:[Regulation 1, Rule 240(d)].
 - a. Venting shall be limited to no more than 1% of the total recovery furnace operating time in a semi-annual reporting period. Venting in excess of the one percent requirement shall not be considered as a violation provided the permittee prepares a Quality Improvement Plan(QIP) for approval by the District which specifies the measures to be taken to bring the venting back to within the allowable one percent maximum[Regulation 1, Rule 230(d)].
 - b. Venting shall be limited to no more than 4% of the total recovery furnace operating time in a semi-annual reporting period. Venting in excess of the four percent requirement as well as, if the approved QIP is not actively pursued or implemented, shall be a violation.

Venting in excess of these allowances may only be allowed during a startup, shutdown or as a malfunction condition, and the condition qualifies as a malfunction in accordance with District breakdown/malfunction policy and is reported as required by section V.F.

B. Condensates from the HVLC collection & handling system for equipment items in section I, Basic Equipment, shall be treated by either recycling to a controlled piece(s) of process equipment in section I, or by steam stripping[40 CFR 63.446(c)].

IV. COMPLIANCE MONITORING

A. The closed-vent system specified in section II, Control Equipment shall meet the following requirements:

1. The permittee shall demonstrate that negative pressure is present at each enclosure or hood which vents a process equipment emission point that is being collected for incineration[40 CFR 63.450(b)]. This test shall be performed at least every 30 days.

2. The closed-vent system shall have a continuous monitoring system (CMS) installed which will detect and determine the amount of time any bypass occurs of the control equipment to the main stack[40 CFR 63.450].

3. The pressure/vacuum vents on the liquor tanks shall have indicating devices and time accumulators which indicate when gases are venting to the atmosphere. Any venting to the atmosphere shall be logged by tank and by venting duration[Regulation 1, Rule 240(d)].

4. Each enclosure and closed-vent system and each condensate closed collection system shall be visually inspected by the permittee every 30 days and at other times as requested by the District or Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects[40 CFR 63.453(k) and 40 CFR 63.453(l)].

a. For condensate drain systems, the permittee shall inspect the individual drain system in accordance with the requirements of 40 CFR 63.964(a)(1) of subpart RR[40 CFR 63.453(l)].

V. REPORTING AND RECORDKEEPING - see General Provisions, section F.

A. If an inspection required under section IV.A.4 identifies visible defects in ductwork, piping, enclosures or connections to covers, or if negative pressures are not maintained, then (i) an effort to repair or correct the problem shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; (ii) the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delays in corrective action or repairs beyond 15 calendar days are allowed as authorized by the District where the corrective actions or repairs are technically infeasible without a process unit shutdown or where the emissions resulting from immediate repair would be greater than the emissions likely to result from delaying the repair[40 CFR 63.453(k)&(l)].

B. For each enclosure opening associated with the basic equipment, closed-vent system, and condensate closed collection system, the permittee shall maintain an inspection plan including a drawing or schematic of the components of the systems and shall record the following information for each inspection[40 CFR 63.454(b)]:

1. Date of inspection;

2. The equipment type and identification;

3. A log shall be kept and maintained for the purpose of recording the information required by Section IV.A.1. The log shall indicate the date, time, initials of person performing the test, results of the negative pressure test, and method used to determine the pressure;

4. The nature of the defect or leak and the method of detection;

5. The date of each attempt to repair the defect or leak;

6. Repair methods applied in each attempt to repair the defect or leak;

7. The reason for the delay if the defect or leak is not repaired within 15 days after discovery;

8. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;

9. The date of successful repair of the defect or leak; and

10. The duration of opening of bypass line valves.

C. The permittee shall report to the District in accordance with Rule 540, Equipment Breakdown, any period of time when the recovery furnace control system is bypassed and vent gases are directed to the main stack in excess of allowances in section III.A[Regulation 1, Rule 240(d)].

D. Startup, Shutdown, and Malfunction Plan - The permittee shall maintain current, and implement a written plan that describes in detail the procedures for operating and maintaining the basic and control equipment in this permit unit during periods of startup, shutdown, and malfunction. The plan will also provide for corrective action for malfunctioning basic and control equipment in this permit unit. The plan must be re-approved by the District upon any changes[40 CFR 63.6(e)(3)].

E. Any actions taken by the permittee during a startup, shutdown or malfunction (including actions taken to correct a malfunction) that are not consistent with the procedures specified in the "Plan", shall be reported to the District by telephone within 2 working days after such actions followed by written confirmation within 7 working days of such actions. The written confirmation shall explain the circumstances of the event and reasons for not following the procedures in the "Plan" [40 CFR 63.10(d)(5)].

F. The permittee shall provide in the monthly monitoring report as described in General Provisions section F.4. the number of minutes per day of venting from each of the liquor storage tanks identified in the Basic Equipment as well as any details concerning plant operations which may have contributed to such venting[Regulation 1, Rule 240(d)].

G. The permittee shall provide in the monthly monitoring report as described in General Provisions section F.4 the total minutes per month that the Recovery Boiler control equipment is bypassed to the main stack[Regulation 1, Rule 240(d)]

VI. OPERATING CONDITIONS - see General Provisions, section C.

A. The closed-vent system specified in section II, Control Equipment shall meet the following requirements:

1. Each enclosure or hood which vents a process equipment emission point that is being collected for incineration shall be maintained at negative pressure during operation of the equipment except as provided in Section III. [40 CFR 63.450(b)].

B. Any condensates from the basic equipment listed in this permit shall be conveyed in a "condensate closed collection system" [40 CFR 63.446(d)].

1. The closed collection system shall meet the individual drain system requirements specified in 40 CFR parts 63.960, 63.961, and 63.962 of subpart RR[40 CFR 63.446(d)(1)].

E. Exempt Equipment

Equipment and operations not specifically identified in this permit are not subject to specific federally-enforceable operating conditions or emission limitations. Such equipment and operations are subject to applicable General Provisions of this permit.

GENERAL PROVISIONS

These general provisions apply to all facilities or sources owned or operated by the permittee as detailed in this permit.

- A. Fee Payment** - The Permittee shall pay an annual permit fee and other fees as required in accordance with Regulation 1, Rule 300 of the District. Failure to pay these fees will result in forfeiture of this Permit to Operate. Operation without a permit subjects the source to potential enforcement action by the District and the US EPA pursuant to section 502(a) of the Clean Air Act as amended in 1990[40 CFR 70.6(a)(7); Regulation 5, Rule 670].
- B. Inspection and Entry** - Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District, CARB, EPA or an authorized representative to perform the following:
1. Enter upon the permittee's premises where a regulated facility or emissions-related activity is located or conducted, or where records must be kept under the conditions of this permit.
 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
 3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the conditions of this permit.
[40 CFR 70.6(c)(2); Regulation 5, Rule 610(e)]
- C. Facilities Operation**
1. Operation under this permit must be conducted in compliance with all data and specifications included in the application which attest to the operator's ability to comply with District Rules and Regulations[Regulation 1, Rule 240(d)].
 2. All nonexempt equipment of this permit shall at all times be maintained in good working order and be operated as efficiently as possible to assure compliance with all applicable emission limits[Regulation 1, Rule 240(d)].
 3. Operational Limit - This permit is valid for a maximum of 365 days per year at 24 hours per day[Regulation 1, Rule 240(d)].
- D. Compliance**
1. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action(including monetary civil penalties); for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit[40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
 2. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit[40 CFR 70.6(a)(6); Regulation 5, Rule 610(g)].
 3. A pending permit action or notification of anticipated noncompliance does not stay any permit condition[Regulation 5, Rule 610(g)(5)].
 4. The permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and

reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by this permit[40 CFR 70.6(a)(6)].

5. The permittee shall provide to the District on an annual basis a completed "Compliance Certification" form which certifies the compliance status of the facility, and on a semi-annual basis a monitoring certification form which provides certification of the monthly monitoring reports. The compliance certification and monitoring certification forms must be signed by a responsible company official and contain a statement that the information contained in the report is true, accurate, and complete. A semi-annual compliance certification report shall be submitted to document the compliance schedule of any source out of compliance[40 CFR 70.6(c); Regulation 5, Rules 460 and 610(g)].

6. Emergency events which occur at the permittee's plant which affect compliance with the terms of this permit must be reported to the District in accordance with Regulation 1, Rule 540. Emergency events are normally outside influences over which the permittee has no control[Regulation 5, Rule 460].

E. **Severability** - If any term or condition of this permit shall for any reason be adjudged by a court of competent jurisdiction to be invalid, such judgment shall not affect or invalidate the remainder of this permit[40 CFR 70.6(a)(5); Regulation 5, Rule 610(h)].

F. Recordkeeping and Reporting

1. The permittee shall maintain files and retain records of all required measurements including continuous and non-continuous monitoring data and support information including the date, place, time and results of any sampling or analysis, the operating conditions at the time of sampling for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all CEM or monitoring device calibration checks; monitor adjustments and maintenance performed; total annual hours of operation; performance and all other information required by 40 CFR 60, Appendix B, and the applicable Performance Specification; and records and copies of all reports required by this permit[40 CFR 70.6(a)(3)(ii)(B); Regulation 5, Rule 455; EPA PSD permit dated April 12, 1999; Regulation 1, Rule 240(d)].

2. The permittee shall report to the District any deviations from these permit requirements, including those attributable to malfunction conditions, the probable cause of the deviations, and any corrective actions or preventive measures taken. Procedures of Regulation 1, Rule 540 shall be followed in the reporting of such deviations. A malfunction log shall be maintained for recordkeeping purposes[40 CFR 70.6(a)(3)(iii)(B); Regulation 5, Rule 460; Regulation 1, Rule 540].

3. The permittee shall maintain records for a period of five years of any startup or shutdown, any basis equipment or control equipment malfunctions, any emergency events, and any periods during which a CEMS, COMS, or CMS is inoperative. Two years of records must be readily accessible [40 CFR 60.7(b)].

4. A monthly monitoring report shall be submitted to the District which provides the following:

- (a) a summary of breakdowns that occurred during the month with date, time and period of excess emissions;
- (b) a summary of the number of minutes per day of venting from the P/V vents of the black liquor storage tanks represented in the Basic Equipment of permit unit NP-076;
- (c) a summary of the number of minutes and percent of recovery boiler operating time per month that the Control Equipment for permit unit NP-076 was bypassed to the main stack;
- (d) The minutes of venting per day for safety relief valves contained in the NCG LVHC system and NCG HVLC system for permit unit NP-075;
- (e) a summary of recovery furnace startups, shutdowns and transient mode operating day & hours including NOx lbs/hr 3-hr averages;
- (f) a summary of emergency events;
- (g) a summary of CEMS or COMS malfunctions;
- (h) a summary of emissions exceedances;
- (i) a summary of reporting or recordkeeping deviations required by this permit;

(j) lime kiln daily and monthly TRS averages;
(k) recovery furnace daily 12-hr and monthly averages for TRS, SO₂, CO, NO_x, and O₂; and
(l) black liquor solids fired per month.
The report shall be due no later than the fifteenth day of the following month [District Authority to construct dated 1/22/91; Regulation 1, Rule 240(d)].

5. The Permittee shall submit certification reports as follows:

- (a) Compliance Certification - January 31st
- (b) Monitoring Certification - January 31st and July 15th

These reports are for complying with General Provisions section D.5.

G. Transfer of Ownership - In the event of any changes in control or ownership of these facilities, this permit together with its terms and conditions shall be binding on all subsequent owners and operators. The permittee shall notify the succeeding owner and operator of the existence of this permit and its conditions by letter, a copy of which shall be forwarded to the District [Regulation 1, Rule 240(j)].

H. Reopening for Cause

1. This permit may be modified, revoked, reopened, reissued, or terminated for the following reasons:

- a. Additional requirements under the federal Clean Air Act become applicable to the facility for which three or more years remain on the original term of the permit. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is to expire.
- b. The District or EPA determines that the permit contains a material mistake made in establishing the emissions standards or limitations, or other requirements of the permit.
- c. The District or EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [40 CFR 70.7(f); Regulation 5, Rule 570]

2. The reopening of this permit for a change to be implemented for a specific permit unit will be allowed without the need to reopen the entire permit and all permit units. Should a general condition be changed, all the associated permit units affected would be reopened [Regulation 1, Rule 240(d)].

3. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [40 CFR 70.6(a)(6)].

I. Property Rights - This permit does not convey any property rights of any sort, or any exclusive privilege [40 CFR 70.6(a)(6)].

J. Permit Renewal and Expiration - This permit is effective on the date of issuance and will expire in five years and must be renewed every five years thereafter. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted. For renewal of a permit, the designated representative shall submit a complete District application no earlier than 18 months and no later than 6 months before the expiration date of the current permit [40 CFR 70.5(a); Regulation 5, Rule 405(b)].

K. Permit Modification - The permittee shall submit an application for a minor or significant permit modification in accordance with District Regulation 5 [40 CFR 70.5(a); Regulation 5, Rule 405].

L. Prohibitions - These limitations apply to all emissions sources at the permittee's facility unless more specific and limiting requirements are listed for a individual permitted emissions unit in this permit.

1. **Public Nuisance** - The permittee shall not discharge such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property [H&S 41700].

2. **Visible Emissions** - The permittee shall not discharge into the atmosphere from any source whatsoever any air contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is as dark or darker in shade as that designated as No. 2 on the Ringlemann Chart, as published by the United States Bureau of Mines; or of such opacity as to obscure an observer's view to a degree equal to or greater than Ringlemann 2 or forty (40) percent opacity[Regulation 1, Rule 410(a)].
3. **Fugitive Dust Emissions** - The handling, transporting, or open storage of material in such a manner which allow unnecessary amounts of particulate matter to become airborne, shall not be permitted. Reasonable precautions shall be taken to prevent particulate matter from becoming airborne[Regulation 1, Rule 430].
4. **Sulfur Oxide Emissions** - The permittee shall not discharge into the atmosphere from any single source of emissions whatsoever sulfur oxides, calculated as sulfur dioxide (SO₂) in excess of 1,000 ppm[Regulation 1, Rule 440].
5. **Circumvention** - The permittee shall not construct, erect, modify, operate, or use any equipment which conceals an air contaminant emission, which would otherwise constitute a violation of the limitations of this permit, unless the operation or use of said equipment results in a significant reduction in the total emission of air contaminants[Regulation 1, Rule 400(b)].
6. **Regulation 2, Open Burning Procedures** - The permittee shall not ignite or cause to be ignited or suffer, allow or maintain any open outdoor fire for the disposal of rubber, petroleum or plastic wastes, demolition debris, tires, tar paper, wood waste, asphalt shingles, linoleum, cloth, household garbage or other combustible refuse; or for metal salvage or burning of motor vehicle bodies except as provided in Rule 2-102, Exemptions[Regulation 2].
7. **Title VI, Stratospheric Ozone Protection** - The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, and 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
8. **National Emission Standard for Asbestos** - The permittee shall comply with the standards of 40 CFR Part 61 Subpart M which regulates demolition and renovation activities as pertaining to asbestos materials.

This permit does not authorize the emission of air contaminants in excess of those allowed by the Health and Safety Code of the State of California or the Rules and Regulations of the North Coast Unified Air Quality Management District as stated in this permit. Any regulation or rule not cited in this permit which may be applicable to a particular emission unit will not be enforceable. This permit cannot be considered as permission to violate existing laws, ordinances, regulation or statutes of other governmental agencies. The violation of any of these terms and conditions shall be grounds for revocation of this permit, and shall be a violation of District Rules and Regulations.

NORTH COAST UNIFIED
AIR QUALITY
MANAGEMENT DISTRICT

2300 MYRTLE AVENUE
EUREKA, CALIFORNIA 95501

PHONE (707) 443-3093
FAX (707) 443-3099

DATE: _____

BY: _____

WAYNE MORGAN,
AIR POLLUTION CONTROL OFFICER



Permit Seal

permits/ LPPULP5PTO