

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT  
and  
TITLE I PERMIT<sup>1</sup>

PERMITTEE

BPB America, Inc.  
Attn: C. C. Van Aken  
901 South Front Street  
Quincy, Illinois 62301

<u>Application No.:</u> 95080036	<u>I.D. No.:</u> 001065ACO
<u>Applicant's Designation:</u>	<u>Date Received:</u> August 8, 1995
<u>Operation of:</u> Paper recycling facility	
<u>Date Issued:</u> June 15, 2001	<u>Expiration Date</u> <sup>2</sup> : June 15, 2006
<u>Source Location:</u> 901 South Front Street, Quincy, Adams	
<u>Responsible Official:</u> Gary Esch, Vice President	

This permit is hereby granted to the above-designated Permittee to OPERATE a paper recycling facility, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Yeric Yarrington at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:YY:jar

cc: Illinois EPA, FOS, Region 2

<sup>1</sup> This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

<sup>2</sup> Except as provided in Condition 8.7 of this permit.

TABLE OF CONTENTS

	<u>PAGE</u>
1.0 SOURCE IDENTIFICATION	4
1.1 Source	
1.2 Owner/Parent Company	
1.3 Operator	
1.4 General Source Description	
2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT	5
3.0 INSIGNIFICANT ACTIVITIES	7
3.1 Identification of Insignificant Activities	
3.2 Compliance with Applicable Requirements	
3.3 Addition of Insignificant Activities	
4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE	9
5.0 OVERALL SOURCE CONDITIONS	13
5.1 Source Description	
5.2 Applicable Regulations	
5.3 Non-Applicability of Regulations of Concern	
5.4 Source-Wide Operational and Production Limits and Work Practices	
5.5 Source-Wide Emission Limitations	
5.6 General Recordkeeping Requirements	
5.7 General Reporting Requirements	
5.8 General Operational Flexibility/Anticipated Operating Scenarios	
5.9 General Compliance Procedures	
6.0 NOT APPLICABLE TO THIS PERMIT	19
7.0 UNIT SPECIFIC CONDITIONS	20
7.1 Particulate Emission Units	
7.2 Fuel Combustion Emission Units	
7.3 VOM Emission Units	
8.0 GENERAL PERMIT CONDITIONS	34
8.1 Permit Shield	
8.2 Applicability of Title IV Requirements	
8.3 Emissions Trading Programs	
8.4 Operational Flexibility/Anticipated Operating Scenarios	
8.5 Testing Procedures	
8.6 Reporting Requirements	
8.7 Obligation to Comply with Title I Requirements	

PAGE

9.0 STANDARD PERMIT CONDITIONS

39

- 9.1 Effect of Permit
- 9.2 General Obligations of Permittee
- 9.3 Obligation to Allow Illinois EPA Surveillance
- 9.4 Obligation to Comply with Other Requirements
- 9.5 Liability
- 9.6 Recordkeeping
- 9.7 Annual Emissions Report
- 9.8 Requirements for Compliance Certification
- 9.9 Certification
- 9.10 Defense to Enforcement Actions
- 9.11 Permanent Shutdown
- 9.12 Reopening and Reissuing Permit for Cause
- 9.13 Severability Clause
- 9.14 Permit Expiration and Renewal

10.0 ATTACHMENTS

- 10.1 Attachment 1 - Emission Factors 1-1
- 10.2 Attachment 2 - Example Certification by a Responsible  
Official 2-1
- 10.3 Attachment 3 - Guidance on Revising This Permit 3-1
- 10.4 Attachment 4 - Form 199-CAAPP, Application For  
Construction Permit (For CAAPP Sources Only) 4-1

1.0 SOURCE IDENTIFICATION

1.1 Source

BPB America, Inc.  
901 South Front Street  
Quincy, Illinois 62301  
217/224-3800

I.D. No.: 001065ACO  
Standard Industrial Classification: 2631, Paperboard Mills

1.2 Owner/Parent Company

BPB America, Inc.  
2424 Lakeshore Road West  
Mississauga, Ontario, Canada L5J 1K4

1.3 Operator

BPB America, Inc.  
901 South Front Street  
Quincy, Illinois 62301

Dave Johnson  
217/224-3800

1.4 General Source Description

BPB America, Inc. is located at 901 South Front Street, Quincy, Illinois. The source receives pre- and post-consumer waste paper by either truck or rail. The bales are pulped using a mechanical pulping process. The bales of waste paper and water are mixed together and agitated by pulping agitators to break the paper down and form a pulp slurry, or stock. The stock is then sent through various thickening and cleaning stages until it is suitable for forming on a paper machine which picks up the stock and forms it into a sheet. Excess water is removed by vacuum and press rollers and the paper is dried in steam heated dryers. The paper is then rolled, packaged, and shipped.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
Btu	British thermal unit
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon monoxide
gal	gallon
HAP	Hazardous Air Pollutant
HCl	Hydrogen chloride
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
kW	kilowatt
l	liter
lb	pound
Mg	Megagram
MW	Megawatt
mmBtu	Million British thermal units
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
ppm	parts per million
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO <sub>2</sub>	Sulfur Dioxide
T	ton
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit

USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material
yr	year

### 3.0 INSIGNIFICANT ACTIVITIES

#### 3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

- 3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Cooling Towers #1 and #2  
Office Boiler  
Oil/Grease Filling Area

- 3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Unload Bales, T-8 #6 PM Stock Chest, PD-3 #4 PM Polydisk, T-10 #4 PM Stock Chest, T-3 Process Water Surge Chest, T-4 Clarified Water Chest, T-15 #6 PM Liner Stock Chest, T-16 #4 PM Top Liner Chest, T-17 #4 PM Top Liner Reserve Chest, Gray Stock Chest, Deinker, Liner Stock Thickener, Yellow Stock Chest, T-18 #6 PM Reserve Liner Chest, T-19 #6 PM Liner Chest, #4 PM Filler Jordan Chest, #4 PM Filler Head Box, #4 PM Liner Head Box, T-601 #6 PM Filler Jordan Chest, #6 PM Filler Head Box, #6 PM Liner Head Box, T-606 #6 PM Broke Pulper, T-607 #6 PM Wet End Broke Storage Chest, T-604 #6 PM Broke Pulper (Dry End), T-605 #6 PM Dry End Broke Storage Chest, Coal Dump at Boiler House, and Reserve Coal Stockpile

- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons per year, provided the storage tank is not used for the storage of gasoline or any material listed as a HAP pursuant to Section 112(b) of the CAA [35 IAC 201.210(a)(10)].

Gas turbines and stationary reciprocating internal combustion engines of between 112 kW and 1,118 kW (150 and 1,500 horsepower) power output that are emergency or standby units [35 IAC 201.210(a)(16)].

- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

### 3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

### 3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Description	Date Constructed	Emission Control Equipment
<p>Paperboard Stock Preparation</p> <p>Filler Stock Preparation System            HP-1 Filler Pulper,            HP-2 Filler Pulper,            T-2 Pulper Dump Chest,            T-1 High Consistency Chest,            T-9 Low Consistency Chest,            T-7A Cloudy Water Chest,            T-7B Cloudy Water Chest,            PD-1 #6 PM Polydisk,            T-12 #6 Blend Chest,            T-11 #4 Blend Chest,            T-5 Clear Leg Process Water Chest,            T-6 Clear Leg Process Water Chest</p> <p>Primary Process Waste Water Surge Chest            Aux. Process Waste Water Surge Chest</p> <p>Primary Process Wastewater Treatment Primary Clarifier</p> <p>Liner Stock Preparation System            Liner Pulper #3, Liner Pulper #4, Liner Pulper #5</p>	<p>Prepare Pulped Filler Stock</p> <p>Store Waste Water Before Treatment</p> <p>Water Treatment</p> <p>Prepare Pulped Stock</p>	<p>1967</p>	<p>None</p>

Emission Unit	Description	Date Constructed	Emission Control Equipment
#4 Paper Machine  Filler Stock Handling System Filler Machine Chest  Wet End Starch Tank  Liner Stock Handling System Liner Machine Chest  Paper Machine and Well Pit  Wet Paper Board Dryer  Dry End Starch Tank  Finished Paper Board Roll System Colander Rolls/Winder  Rewinder Trim Conveyor Cyclone Rewinder Paper Trim Conveyor	Handling of High Consistency Filler Stock  Manufacture of Paper Board Coating Material  Handling of High Consistency Liner Stock  Manufacture of Wet Paper Board  Drying of Wet Paper Board  Manufacture of Paper Board Coating Material  Rolling and Cutting of Finished Paper Board  Convey Paper Board Shavings to Repulper		

Emission Unit	Description	Date Constructed	Emission Control Equipment
#6 Paper Machine			
Filler Stock Handling System T-602 Filler Machine Chest	Handling of High Consistency Filler Stock		
Wet End Starch Tank	Manufacture of Paper Board Coating Material		
Liner Stock Handling System Liner Machine Chest	Handling of High Consistency Liner Stock		
Paper Machine and Well Pit	Manufacture of Wet Paper Board		
Wet Paper Board Dryer	Drying of Wet Paper Board		
Dry End Starch Tank	Manufacture of Paper Board Coating Material		
Finished Paper Board Roll System Colander Rolls/Winder	Rolling and Cutting of Finished Paper Board		
Steam and Electric Generation (Process Units)			
Coal Conveying System Convey Coal to Hopper/Bunker, Dump Coal to Storage Hopper	Convey Coal From Dump to Boiler Stocker Feed Hoppers		
Coal Reserve Stockpile Coal Dump at Reserve Pile	Boiler Fuel Transfer		
Ash Handling System Ash Dump From Boilers, Fly Ash Conveyor, Ash Silo	Convey and Store Boiler Ash		Scrubber - Ash Conveying
Steam and Electric Generation (Fuel Combustion Units)			
#7 Boiler	Produce Steam and Power From Coal	1954	Cyclonic Fly Ash Collectors
#8 Boiler	Combustion	1954	
Gasoline Storage Tank	Store Gasoline	1995	None

Emission Unit	Description	Date Constructed	Emission Control Equipment
Fugitive Particulate Emissions	Traffic Emissions And 13 Welding Stations	----	None
Fugitive VOM Emissions	Gasoline Filling and 7 Solvent Recovery Stations	----	None

## 5.0 OVERALL SOURCE CONDITIONS

### 5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of nitrogen oxides, particulate matter, sulfur dioxide, and HAP emissions.

### 5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

Compliance with this requirement is considered to be assured by the inherent nature of operations at this source, as demonstrated by historical operation.

- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 212.124.

#### 5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### 5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
- b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

#### 5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with

safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
  - i. Illinois EPA, Compliance Section; and
  - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
  - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

#### 5.2.7 CAM Plan

This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

#### 5.3 Non-Applicability of Regulations of Concern

None

#### 5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	28
Sulfur Dioxide (SO <sub>2</sub> )	5,938
Particulate Matter (PM)	304
Nitrogen Oxides (NO <sub>x</sub> )	357
HAP, not included in VOM or PM	91
TOTAL	6,717

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.5 Records for Operating Scenarios

N/A

5.6.6 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance Section, on HAP emissions from the source. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

6.0 NOT APPLICABLE TO THIS PERMIT

7.0 UNIT SPECIFIC CONDITIONS

7.1 Particulate Emission Units

7.1.1 Description

These emission units are units that prepare the waste paper for pulping, pulp the waste paper, thicken and clean the pulp slurry, form sheets of paper from the slurry, dry the paper, and roll and package the paper. Also included are emission units that handle coal and fly ash and fugitive emissions.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Paperboard Stock Preparation		None
Filler Stock Preparation System	Prepare Pulped Filler Stock	
Primary Process Waste Water Surge Chest	Store Waste Water Before Treatment	
Primary Process Wastewater Treatment	Water Treatment	
Liner Stock Preparation System	Prepare Pulped Stock	

Emission Unit	Description	Emission Control Equipment
#4 Paper Machine  Filler Stock Handling System  Wet End Starch Tank  Liner Stock Handling System  Paper Machine and Well Pit  Wet Paper Board Dryer  Dry End Starch Tank  Finished Paper Board Roll System  Rewinder Trim Conveyor Cyclone	Handling of High Consistency Filler Stock  Manufacture of Paper Board Coating Material  Handling of High Consistency Liner Stock  Manufacture of Wet Paper Board  Drying of Wet Paper Board  Manufacture of Paper Board Coating Material  Rolling and Cutting of Finished Paper Board  Convey Paper Board Shavings To Repulper	None
#6 Paper Machine  Filler Stock Handling System  Wet End Starch Tank  Liner Stock Handling System  Paper Machine and Well Pit  Wet Paper Board Dryer  Dry End Starch Tank  Finished Paper Board Roll System	Handling of High Consistency Filler Stock  Manufacture of Paper Board Coating Material  Handling of High Consistency Liner Stock  Manufacture of Wet Paper Board  Drying of Wet Paper Board  Manufacture of Paper Board Coating Material  Rolling and Cutting of Finished Paper Board	None

Emission Unit	Description	Emission Control Equipment
Steam And Electric Generation (Process Units)		
Coal Conveying System	Convey Coal From Dump to Boiler Stocker Feed Hoppers	
Coal Reserve Stockpile	Boiler Fuel Transfer	
Ash Handling System	Convey and Store Boiler Ash	Scrubber
Fugitive Particulate Emissions		None
Traffic Emissions	Truck Traffic on Site	
13 Welding Stations	Maintenance	

Individual process emission units are listed in Attachment 1.

#### 7.1.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission unit" for the purpose of these unit-specific conditions, is each emission unit identified in Condition 7.1.2.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. The affected emission units are subject to 35 IAC 212.322, which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which, either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

The allowable particulate matter emission limits for the affected emission units may be calculated based upon the following emission factors and formulas:

$$E = C + A(P)^B$$

Where:

E = Allowable particulate matter emission rate  
P = Process weight rate

For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

For process weight rate in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

7.1.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard or do not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.1.5 Control Requirements

None

7.1.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.1.7 Operating Requirements

None

7.1.8 Inspection Requirements

None

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.5.1 and 7.1.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Dry paper throughput (tons/day);
- b. Water used in process (1000 gal/day);
- c. Hydrogen chloride in muriatic acid solution (%HCl) and amount of muriatic acid used (tons/day);
- d. Amount of dry product produced from each dryer (ton/day);
- e. Coal throughput (tons/day);
- f. Coal ash production (tons/day);
- g. Welding rod throughput (ton/day);
- h. Vehicle miles traveled (miles/day).

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the emission limits in Conditions 5.5 and 7.1.3 shall be based on the recordkeeping requirements in Condition 7.1.9, the emission factors in Attachment 1, and the formulas listed below:

Emissions (lb) = the emission factor  
multiplied by the appropriate parameter.

- b. Hydrogen chloride emissions from the aux. process water surge chest, #4 PM wet end starch tank, and #6 PM wet end starch tank shall be calculated by multiplying the amount of muriatic acid used by the weight percent HCl in the solution.

7.2 Fuel Combustion Emission Units

7.2.1 Description

These boilers produce steam and power from burning coal for the manufacture of paper board.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
#7 Boiler (PID111)	120 mmBtu/Hr Coal-Fired Boiler	Multiclone Mechanical Collector
#8 Boiler (PID112)	120 mmBtu/Hr Coal-Fired Boiler	Multiclone Mechanical Collector

7.2.3 Applicability Provisions and Applicable Regulations

a. The "affected boiler" for the purpose of these unit-specific conditions, is each boiler identified in Condition 7.2.2.

b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.

c. The affected boilers are subject to 35 IAC 212.203, which provides that:

Any fuel combustion emission unit for which construction or modification commenced prior to April 14, 1972, using solid fuel exclusively may, in any one hour period, emit up to, but not exceed 0.31 kg/MW-hr (0.20 lbs/mmBtu).

d. The affected boilers are subject to 35 IAC 214.142(a), which provides that:

No person shall cause or allow the emission of sulfur dioxide into the atmosphere in any one hour period from any existing fuel combustion source with actual heat input less than, or equal to, 73.2 MW (250 mmBtu/hr), burning solid fuel exclusively, located outside the Chicago, St. Louis (Illinois) or Peoria major metropolitan areas, to exceed 10.5 kg of sulfur dioxide per MW-hr of actual heat input (6.8 lbs/mmBtu)

e. The affected boilers are subject to 35 IAC 216.121, which provides that:

No person shall cause or allow the emission of carbon monoxide (CO) into the atmosphere from any fuel combustion emission source with actual heat input

greater than 2.9 MW (10 mmBtu/hr) to exceed 200 ppm, corrected to 50 percent excess air.

f. Startup Provisions

The Permittee is authorized to operate the affected boilers in violation of the applicable limit of 35 IAC 212.123 during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to 6-hours following initial firing of fuel during each startup event.
- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups, and minimize the frequency of startups:
  - A. Implementation of established startup procedures; and
  - B. Good operating and maintenance practices.
- iii. The Permittee shall fulfill the applicable recordkeeping requirements of Condition 7.2.9(a).

7.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected boilers not being subject to 40 CFR 60, Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, because the affected boilers were not constructed, modified, or reconstructed after June 19, 1984.

7.2.5 Control Requirements

The multiclones shall be operated and maintained so as to achieve compliance with 35 IAC 212.203.

7.2.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include this unit.

#### 7.2.7 Testing Requirements

- a. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:
  - i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].
  - ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3 and 4 [35 ICA 212.110(b)].
  - iii. Upon written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].
- b. Upon reasonable request by the Illinois EPA, pursuant to Section 39.5(7)(d) of the Act, measurements of opacity shall be conducted in accordance with Method 9, 40 CFR Part 60, Appendix A, and 35 IAC 212.109, so as to demonstrate compliance with the emission limits in Condition 7.2.3(b).
- c. Pursuant to 35 IAC 214.101(e), plants with total solid fuel-fired heat input capacity exceeding 14.65 MW (50 mmBtu/hr) but not exceeding 146.5 MW (500 mmBtu/hr) shall demonstrate compliance or non-compliance with Condition 7.2.3(d) (see also 35 IAC 214.142(a)) by either an analysis of calendar monthly composites of daily fuel samples or by compliance with 35 IAC 214.101(c), at the option of the plant. The specific ASTM in Conditions 7.2.7(c)(i) through (c)(iii) (see also 35 IAC 214.104(c)), shall be used for sulfur and heating value determinations as follows:
  - i. For solid fuel sampling:
    - ASTM D-2234 (1989)
    - ASTM D-2013 (1986)

ii. For sulfur determinations:

ASTM D-3177 (1984)  
ASTM D-2622 (1987)  
ASTM D-3180 (1984)  
ASTM D-4239 (1985)

iii. For heating value determinations:

ASTM D-2015 (1985)  
ASTM D-3286 (1985)

#### 7.2.8 Inspection Requirements

None

#### 7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.5.1 and 7.2.3, pursuant to Section 39.5(7)(b) of the Act:

##### a. Records for Startup

The Permittee shall maintain the following records, pursuant to Section 39.5(7)(b) of the Act, for each affected boiler subject to Condition 7.2.3(f), which at a minimum shall include:

- i. The following information for each startup of an affected boiler:
  - A. Date and duration of the startup, i.e., start time and time normal operation achieved, i.e., stable operation at load;
  - B. If normal operation was not achieved within 6-hours, an explanation why startup could not be achieved in 6-hours;
  - C. A detailed description of the startup, including reason for shutdown and operation;
  - D. An explanation why the established startup procedures could not be performed, if not performed;
  - E. The nature of opacity, i.e., severity and duration, during the startup and the

nature of opacity at the conclusion of startup, if above normal; and

- F. Whether exceedance of Condition 5.2.2 may have occurred during startup, with explanation and estimated duration (minutes).
- ii. A maintenance and repair log for each affected boiler, listing each activity performed with date.
- b. Coal throughput (tons/day);
- c. Pursuant to 35 IAC 212.110(e) and Section 39.5(7) of the Act, the owner or operator of an emission unit subject to 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least five (5) years after the date a test is performed and shall include the following:
  - i. The date, place and time of sampling or measurements;
  - ii. The date(s) analyses were performed;
  - iii. The company or entity that performed the analyses;
  - iv. The analytical techniques or methods used;
  - v. The results of such analyses; and
  - vi. The operating conditions as existing at the time of sampling or measurement.
- d. Each proximate analysis that includes the bituminous coal sulfur content (weight percent) as determined from a representative sample on at least a monthly basis.

#### 7.2.10 Reporting Requirements

- a. The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.
- b. A person planning to conduct testing for particulate matter emissions to demonstrate compliance shall give written notice to the Illinois EPA of that intent.

Such notification shall be given at least thirty (30) days prior to the initiation of the test unless a shorter period is agreed to by the Illinois EPA. Such notification shall state the specific test methods from Condition 7.2.7(a) (see also 35 IAC 212.110) that will be used [35 IAC 212.110(d)].

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5 and 7.2.3 shall be based on the recordkeeping requirements in Condition 7.2.9 and the emission factors and formulas listed below:

<u>Pollutant</u>	<u>Emission Factor</u>
NO <sub>x</sub>	7.5
PM	0.17
SO <sub>2</sub>	125.4
VOM	0.07
CO	6
Lead	0.0133
HCl	1.9

These are the emission factors from repeated emission tests and an average coal sulfur content of 3.3%. All emission factors are in units of lb/ton of coal except PM, which is in units of lb/mmBtu.

Boiler Emissions (lb) = Coal throughput (or firing rate for PM) multiplied by the appropriate emission factor.

7.3 VOM Emission Units

7.3.1 Description

These emission units are units that are used to clean parts and to store gasoline for use in on-site vehicles.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
7 Solvent Recovery Stations (PID136)	Cleaning Solvents	None
Gasoline Tank (PIDT143)	1500 Gallon Tank	None
Gasoline Filling (PID144)	On-Site Vehicle Refill	None

7.3.3 Applicability Provisions and Applicable Regulations

- a. The "affected emission unit" for the purpose of these unit-specific conditions, is each emission unit identified in Condition 7.3.2.
- b. Each affected emission unit is subject to the emission limits identified in Condition 5.2.2.
- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except for the following exception: If no odor nuisance exists the limitation of this condition shall apply only to photochemically reactive material. [35 IAC 215.301]
- d. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe, submerged fill or an equivalent device approved by the Illinois EPA. [35 IAC 215.122(b)]

7.3.4 Non-Applicability of Regulations of Concern

This permit is issued based on the affected emission units not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected emission units do not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements

None

7.3.6 Emission Limitations

There are no specific emission limitations for these units, however, there are source wide emission limitations in Condition 5.5 that include this unit.

7.3.7 Operating Requirements

None

7.3.8 Inspection Requirements

None

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for each affected emission unit to demonstrate compliance with Conditions 5.5.1 and 7.3.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Amount of solvent transferred (tons/year);
- b. Amount of gasoline purchased (1,000 gal/year);

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of an affected emission unit with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5 and 7.3.3 shall be based on the recordkeeping requirements in Condition 7.3.9 and the emission factors and the formulas listed below:

- a. Solvent recovery stations

Emissions (ton) = amount of solvent shipped in - amount of solvent shipped out.

b. Gasoline tanks

For the purpose of estimating VOM emissions from the affected tank, the current version of the TANKS program is acceptable.

c. Gasoline filling

Emissions (lbs) = amount purchased times 12 lbs/1000 gal

## 8.0 GENERAL PERMIT CONDITIONS

### 8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after April 18, 2001 unless this permit has been modified to reflect such new requirements.

### 8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

### 8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

### 8.4 Operational Flexibility/Anticipated Operating Scenarios

#### 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

#### 8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this

permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
  - i. Describe the physical or operational change;
  - ii. Identify the schedule for implementing the physical or operational change;
  - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
  - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
  - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

#### 8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

## 8.6 Reporting Requirements

### 8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

### 8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

- g. Any proposed use of an alternative test method, with detailed justification.

#### 8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

#### 8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
  - i. Illinois EPA - Air Compliance Section  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (MC 40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276
  - ii. Illinois EPA - Air Regional Field Office  
  
Illinois Environmental Protection Agency  
Division of Air Pollution Control  
5415 North University  
Peoria, Illinois 61614

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Permit Section (MC 11)  
P.O. Box 19506  
Springfield, Illinois 62794-9506

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)  
Air & Radiation Division  
77 West Jackson Boulevard  
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

## 9.0 STANDARD PERMIT CONDITIONS

### 9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].

9.1.2 In particular, this permit does not alter or affect the following:

- a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
- b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
- d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

### 9.2 General Obligations of Permittee

#### 9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
  - i. At reasonable times, for the purposes of assuring permit compliance; or
  - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

#### 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

#### 9.5 Liability

##### 9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

##### 9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

##### 9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

##### 9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any

loss due to damage, installation, maintenance, or operation of the source.

#### 9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

### 9.6 Recordkeeping

#### 9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

#### 9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

#### 9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

### 9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

### 9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance

certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

#### 9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

#### 9.10 Defense to Enforcement Actions

##### 9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

##### 9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
  - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
  - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

#### 9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

#### 9.12 Reopening and Reissuing Permit for Cause

##### 9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

#### 9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

#### 9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

#### 9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA 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 Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

#### 9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements

underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

#### 9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

10.1 Attachment 1 - Emission Factors

TABLE 1-1 - Particulate Matter

Emission Units	Emission Factor	Parameter
Paperboard Stock Preparation		
Filler Stock Preparation System		
HP-1 Filler Pulper (PID3)	0.019	1,000 Gal Water
HP-2 Filler Pulper (PID3A)	0.019	1,000 Gal Water
T-2 Pulper Dump Chest (PID4)	0.0019	1,000 Gal Water
T-1 High Consistency Chest (PID6)	0.0019	1,000 Gal Water
T-9 Low Consistency Chest (PID8)	0.0019	1,000 Gal Water
T-7A Cloudy Water Chest (PID11)	0.0019	1,000 Gal Water
T-7B Cloudy Water Chest (PID16)	0.0019	1,000 Gal Water
PD-1 #6 PM Polydisk (PID17)	0.0006	1,000 Gal Water
T-12 #6 Blend Chest (PID19)	0.0019	1,000 Gal Water
T-11 #4 Blend Chest (PID22)	0.0019	1,000 Gal Water
T-5 Clear Leg Process Water Chest (PID23)	0.0019	1,000 Gal Water
T-6 Clear Leg Process Water Chest (PID24)	0.0019	1,000 Gal Water
Primary Process Waste Water Surge Chest		
Aux. Process Waste Water Surge Chest (PID26)	0.0019	1,000 Gal Water
Primary Process Wastewater Treatment		
Primary Clarifier (PID27)	0.0019	1,000 Gal Water
Liner Stock Preparation System		
Liner Pulper #3 (PID29)	0.019	1,000 Gal Water
Liner Pulper #4 (PID30)	0.019	1,000 Gal Water
Liner Pulper #5 (PID31)	0.019	1,000 Gal Water
#4 Paper Machine		
Filler Stock Handling System		
Filler Machine Chest (PID52)	0.0019	Ton Dry Product
Wet End Starch Tank (PID54)	0.0019	1,000 Gal Water
Liner Stock Handling System		
Liner Machine Chest (PID55)	0.0019	1,000 Gal Water
Paper Machine and Well Pit (PID58)	0.05	Ton Dry Product
Wet Paper Board Dryer (PID60)	0.6	Ton Dry Product
Dry End Starch Tank (PID61)	0.0019	1,000 Gal Water
Finished Paper Board Roll System		
Colander Rolls/Winder (PID62)	-----	Mass Balance
Rewinder Trim Conveyor Cyclone		
Rewinder Paper Trim Conveyor (PID64)	0.001	Ton Paper Trim
#6 Paper Machine		
Filler Stock Handling System		
T-602 Filler Machine Chest (PID72)	0.0019	Ton Dry Product
Wet End Starch Tank (PID74)	0.0019	1,000 Gal Water
Liner Stock Handling System		
Liner Machine Chest (PID75)	0.0019	1,000 Gal Water
Paper Machine and Well Pit (PID78)	0.05	Ton Dry Product
Wet Paper Board Dryer (PID82)	0.6	Ton Dry Product
Dry End Starch Tank (PID83)	0.0019	1,000 Gal Water
Finished Paper Board Roll System		
Colander Rolls/Winder (PID84)	-----	Mass Balance

Emission Units	Emission Factor	Parameter
Steam and Electric Generation (Process Units)		
Coal Conveying System		
Convey Coal to Hopper/Bunker (PID101)	0.2	Ton Coal
Dump Coal to Storage Hopper (PID106)	0.2	Ton Coal
Coal Bunker (PID104)		
Coal Larry (PID105)		
Coal Reserve Stockpile		
Coal Dump at Reserve Pile (PID102)	0.2	Ton Coal
Ash Handling System		
Ash Dump from Boilers (PID113)	0.15	Ton Ashes
Fly Ash Conveyor (PID114)	0.15	Ton Ashes
Ash Silo (PID115)	0.15	Ton Ashes
Ash Loading Station to trucks (PID116)		
Fugitive Particulate Emissions		
Traffic emissions (PID135)	10.5	Vehicle Mile
13 welding stations (PID140)	0.01	Traveled
		Ton Welding Rods

10.2 Attachment 2 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Official Title: \_\_\_\_\_

Telephone No.: \_\_\_\_\_

Date Signed: \_\_\_\_\_

### 10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
  - Corrects typographical errors;
  - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
  - Requires more frequent monitoring or reporting by the Permittee;
  - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
  - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
  - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
  - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
  - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

### 3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency  
Division Of Air Pollution Control -- Permit Section  
P.O. Box 19506  
Springfield, Illinois 62794-9506

<b>Application For Construction Permit (For CAAPP Sources Only)</b>	For Illinois EPA use only
	ID number:
	Permit number:
	Date received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CA APP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip code:	
5. Is the source located within city limits? <input type="checkbox"/> Yes <input type="checkbox"/> No		
6. Township name:	7. County:	8. ID number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

<b>Summary Of Application Contents</b>	
24. Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
25. Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	<input type="checkbox"/> Yes <input type="checkbox"/> No
26. Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
27. Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	<input type="checkbox"/> Yes <input type="checkbox"/> No
28. Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	<input type="checkbox"/> Yes <input type="checkbox"/> No
29. If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No  <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

<b>Signature Block</b>	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30. I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature:	
_____ AUTHORIZED SIGNATURE	_____ TITLE OF SIGNATORY
_____ TYPED OR PRINTED NAME OF SIGNATORY	_____ / _____ / _____ DATE

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.