

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 46898
Catalyst Paper (Snowflake) Inc.**

I. INTRODUCTION

This is a renewal Class I, Title V air quality control permit for the operation of a paper mill near Snowflake in Navajo County, Arizona. This permit renews and supersedes Operating Permit #M170424P1-99. The facility is owned and operated by Catalyst Paper (Snowflake) Inc (CPSI). The paper mill produces approximately 1,460 tons per day of newsprint and newsprint-like grades from recycled newsprint, magazines and purchased pulp.

A. Company Information

Facility Name: Catalyst Paper Mill

Facility Location: 14 miles west of Snowflake
Approximately 1.5 miles north of Arizona highway 277

Mailing Address: P.O. Box 128
Snowflake, Arizona 85937

B. Attainment Classification

The Snowflake area is in attainment for all criteria pollutants.

C. Learning Sites Evaluation

In accordance with ADEQ's Environmental Permits and Approvals Near Learning Sites Policy, the Department conducted an evaluation to determine if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

There are no learning sites within two miles of the facility.

II. FACILITY DESCRIPTION

A. Process Description

1. Paper Recycling and Production

The paper mill receives its raw material in the form of old newspapers, magazines and purchased pulp. This material is mixed with water, process chemicals, and steam to form a slurry. The slurry travels to Deinking Machines #2 and #3 where it is processed and screened to remove ink and impurities. The slurry is then processed in Paper Machines #1 and #3 into varying grades of newsprint and newsprint-like paper. The mill produces approximately 1,460 tons of paper per day.

2. Power Boilers

Power Boilers #1, #2, and #3 produce all the steam and electricity needed by the paper

mill. Power Boiler #2 has a maximum capacity of 1,132 million Btu per hour (MMBtu/hr). It is the primary source of electricity and steam at the mill and combusts mainly coal. Power Boilers #1 and #3 are stand-by units, have a maximum capacity of 523 MMBtu/hr and 337 MMBtu/hr respectively, and combust natural gas and fuel oil #2.

3. Coal Handling Facility

The coal combusted in Power Boiler #2 is received by truck or rail. The delivered coal is stored in a storage pile. As needed, the coal travels by conveyor belts to a crusher and the crushed coal is stored in one of four silos. Coal is combusted in Power Boiler #2 at the rate of 61 tons per hour.

4. Wastewater Treatment Plant

The wastewater treatment plant is used to treat the effluent from the mill. The clarified water from the treatment plant is either stored in one of two ponds or used in the biomass plantation to grow various crops. The solid sludge from the treatment plant is used to fire the boiler at the nearby Snowflake White Mountain Power facility.

5. Ash Pond

Ash from Power Boiler #2 is sluiced to one of two storage ponds. There it is kept moist to reduce fugitive particulate matter emissions. Once a pond reaches capacity, it is allowed to dry out and the ash is loaded onto trucks and landfilled on site.

B. Air Pollution Control Equipment

Table 1 – Air Pollution Control Equipment

Emission Unit	Control Device	Controlled Pollutant
Power Boiler #2	Electrostatic Precipitator (ESP)	PM
Power Boiler #2	Slipstream Alkaline Scrubber	SO ₂
Power Boiler #3	Low NO _x Burner	NO _x
Coal Handling Facility	Water Sprays	PM
Soda Ash Silo	Baghouse	PM

III. COMPLIANCE HISTORY

There have been 62 inspections of this facility since 1992 and one Notice of Violation (NOV) associated with Permit #M170424P1-99. The NOV was issued on December 10, 2003, for violating the opacity limit on Power Boiler #2 on seven occasions and for not properly operating the pollution control equipment on Power Boiler #2. At the time the facility was owned by Abitibi Consolidated and not by CPSI. Abitibi Consolidated was required to achieve compliance by January 14, 2004, and the NOV was closed on April 13, 2004. There are no current violations associated with this facility.

IV. EMISSIONS

Emissions from this facility result from the Power Boilers and the paper recycling process.

Table 2: Potential to Emit (PTE) of Facility

Pollutant	Facility PTE tons per year (tpy)
PM ₁₀ /PM _{2.5}	78.3
PM	164
NO _x	4,150
CO	495
SO ₂	2,130
VOC	47.2
HAPS	131

- 1- AP-42 and "Pulp, Paper, and Paperboard Industry - Background Information for Proposed Air Emission Standards" used for all emissions except where test data is available. See application for more information.
- 2- All emissions based on continuous operation.

V. APPLICABLE REGULATIONS

Table 3 identifies applicable regulations and verification as to why that standard applies.

Table 3: Verification of Applicable Regulations

Unit	Control Device	Rule	Verification
Power Boiler #1	None	A.A.C. R18-2-702.B.3 A.A.C. R18-2-702.C A.A.C. R18-2-703.C.1 A.A.C. R18-2-703.E.1 A.A.C. R18-2-703.H A.A.C. R18-2-703.K	Power Boiler #1 is a fossil-fuel fired steam generating unit which has a capacity greater than 73 megawatts and its construction was commenced before August 17, 1971. The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources. The National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #1 but was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. Upon the promulgation of a new NESHAP for industrial boilers, those standards may apply to Power Boiler #1.
Power Boiler #2	ESP for PM Scrubber for SO ₂	A.A.C.R18-2-903.1 40 CFR 60 Subpart D	New Source Performance Standard (NSPS) Subpart D applies to Power Boiler #2 because it is a fossil-fuel fired steam generating unit which has a heat input rate greater than 73 megawatts and its construction was commenced after August 17, 1971. National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #2 but was vacated by the Court of Appeals for the District of Columbia on June

Unit	Control Device	Rule	Verification
			<p>8, 2007. Upon the promulgation of a new NESHAP for Industrial Boilers, those standards may apply to Power Boiler #2.</p> <p>Compliance Assurance Monitoring (CAM) applies to Power Boiler #2 for PM and SO₂ because it is subject to emission limitations for these pollutants, uses a control device to achieve those standards, and has pre-control PTE greater than 100 tpy.</p>
Power Boiler #3	Low NO _x Burner	40 CFR 60 Subpart Db	<p>NSPS Subpart Db applies to Power Boiler #3 because it is a steam generating unit which has a heat input capacity greater than 29 megawatts and its construction was commenced after June 19, 1984.</p> <p>National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #3 but was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. Upon the promulgation of a new NESHAP for Industrial Boilers, those standards may apply to Power Boiler #3.</p>
General Regulations for Continuous Monitoring Systems (CMS)	None	40 CFR 60.7(b) 40 CFR 60.7(c) 40 CFR 60.7(d) 40 CFR 60.7(f) 40 CFR 60.13(a) 40 CFR 60.13(c) 40 CFR 60.13(c)(2) 40 CFR 60.13(d)(1) 40 CFR 60.13(d)(2) 40 CFR 60.13(e)(1) 40 CFR 60.13(e)(2) 40 CFR 60.13(h)(1) 40 CFR 60.13(h)(2)	These standards are applicable to the Power Boiler #2 Continuous Opacity Monitoring System (COMS), the Power Boiler #2 SO ₂ Continuous Emission Monitoring System (CEMS), and the Power Boiler #3 NO _x CEMS.
Coal Handling Facility	Water Sprays	A.A.C. R18-2-702.B.3 A.A.C. R18-2-716.B.1 A.A.C. R18-2-716.B.2	<p>These standards are applicable to coal preparation facilities which commenced construction before October 24, 1974.</p> <p>The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources.</p>
Internal Combustion Engines	None	A.A.C. R18-2-719.B A.A.C. R18-2-719.C.1 A.A.C. R18-2-719.E A.A.C. R18-2-719.F A.A.C. R18-2-719.H A.A.C. R18-2-719.J 40 CFR 63 Subpart ZZZZ	<p>These standards are applicable to diesel internal combustion engines manufactured before April 1, 2006.</p> <p>The National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ is applicable to reciprocating internal combustion engines located at major sources of HAPs.</p>

Unit	Control Device	Rule	Verification
Fuel Burning Equipment	None	A.A.C. R18-2-724.C.1 A.A.C. R18-2-724.J	These standards apply to fossil fuel fired industrial equipment rated at between 0.5 MMBtu/hr and 250 MMBtu/hr in which the products of combustion do not come into direct contact with process materials.
Paper Machine #1	Baghouse on Soda Ash Silo	A.A.C. R18-2-702.B.3 A.A.C. R18-2-730.A A.A.C. R18-2-730.A.2	The standards from A.A.C. R18-2-730 apply to unclassified sources.
Paper Machine #3	Water on Ash Pond	A.A.C. R18-2-730.A.3 A.A.C. R18-2-730.D A.A.C. R18-2-730.F A.A.C. R18-2-730.G A.A.C. R18-2-730.H	The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources.
Corrugated Waste Area			
De-inking Systems			
Waste Water Treatment Plant			
Ash Pond			
Storage tanks not covered by other requirements			
Soda Ash Silo			
Cooling Towers			
4,000 gallon gasoline tank	Submerged filling device; Pump/compressor seals	A.A.C. R18-2-710.B A.A.C. R18-2-710.D A.A.C. R18-2-710.E.1	These standards apply to existing storage vessels for petroleum liquids. NESHAP Subpart CCCCCC does not apply to major sources of HAPS.
Fugitive dust sources	Water and other reasonable precautions.	A.A.C. R18-2-604.A A.A.C. R18-2-604.B A.A.C. R18-2-605.A A.A.C. R18-2-605.B A.A.C. R18-2-606 A.A.C. R18-2-607.A A.A.C. R18-2-607.B A.A.C. R18-2-614 A.A.C. R18-2-702.B	These standards are applicable to all fugitive dust sources at the facility.
Mobile sources	Water Sprays/Water Truck for dust control	A.A.C. R18-2-801.A A.A.C. R18-2-801.B A.A.C. R18-2-802.A A.A.C. R18-2-802.B A.A.C. R18-2-804.A A.A.C. R18-2-804.B	These are applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization.
Abrasive Blasting	Wet blasting; Dust collecting equipment;	A.A.C. R-18-2-702.B A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.

Unit	Control Device	Rule	Verification
	Other approved methods		
Spray Painting	Enclosures	A.A.C. R18-2-702.B A.A.C. R-18-2-727.A A.A.C. R-18-2-727.B A.A.C. R-18-2-727.C A.A.C. R-18-2-727.D	This standard is applicable to any spray painting operation.
Demolition / renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.

VI. NESHAP SUBPART DDDDD – INDUSTRIAL BOILERS

NESHAP Subpart DDDD was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. A new MACT was proposed on April 29, 2010 and once the new standards are finalized the Department will incorporate the applicable portions of the rule into CPSI’s Title V permit.

VII. PREVIOUS PERMIT CONDITIONS

Table 4 compares the conditions in Permit No. M170424P1-99 with the conditions in the new permit and cross-references the previous permit conditions to their location in the new permit

Table 4: Comparison of Previous and Current Permit Conditions

Condition # in Permit # M170424P1-99	Determination				Comments
	Delete	Kept	Revise	Streamline	
Attachment A			X		This Attachment has been revised and the most recent Attachment “A” is used for this permit.
Attachment B					
Condition I.A		X			This condition to require a certified Method 9 observer has been retained.
Condition I.B		X			This fuel standard has been retained.
Condition I.C.1	X				This condition to require recordkeeping of paper production has been deleted because there is no limit on paper production.
Condition I.C.2	X				This storage tank requirement is no longer applicable to the facility because NSPS Subpart Kb has been amended.
Condition I.C.3		X			This requirement to keep fuel supplier certifications has been retained.

Condition # in Permit # M170424P1-99	Determination				Comments
	Delete	Kept	Revise	Streamline	
Condition I.D		X			This reporting requirement has been retained.
Condition II.A.1		X			This fuel limitation has been retained.
Condition II.A.2.a	X				This fuel recordkeeping requirement has been deleted because there is no permit limit on fuel usage.
Condition II.A.2.b	X				This fuel monitoring requirement has been deleted because there is no permit limit on fuel usage.
Condition II.B.1.a		X			This PM standard has been retained.
Condition II.B.1.b			X		This opacity limit has been lowered to 20% in A.A.C. R18-2-702.
Condition II.B.2			X		This bi-weekly opacity observation requirement has been revised to include quarterly observations during periods of natural gas usage.
Condition II.B.3.a	X				This annual opacity performance test requirement has been removed because the permit requires opacity surveys.
Condition II.B.3.b	X				This one time PM performance test requirement has been removed since the PM permit limit can not be violated and the emissions of this unit will be below 100 tpy.
Condition II.C.1.a		X			This SO ₂ limit has been retained.
Condition II.C.2.a		X			This fuel recordkeeping requirement has been retained.
Condition II.D.1.a		X			This requirement to calculate NO _x emissions has been retained.
Condition II.D.1.b		X			This requirement to record NO _x emissions has been retained.
Condition II.D.2		X			This NO _x testing requirement has been retained.
Condition III.A.1		X			This fuel limitation has been retained.
Condition III.A.2	X				This fuel limitation has been removed because limiting the use of fuel oil #2 does not lower emissions since coal is the other fuel used.
Condition III.A.3		X			This fuel limitation has been retained.

Condition # in Permit # M170424P1-99	Determination				Comments
	Delete	Kept	Revise	Streamline	
Condition III.A.4		X			This fuel limitation has been retained.
Condition III.A.5		X			This fuel limitation has been retained.
Condition III.B.1.a			X		This PM standard has been revised to include periods of natural gas usage.
Condition III.B.1.b			X		This PM standard has been revised to include periods of natural gas usage.
Condition III.B.2		X			This control equipment requirement has been retained.
Condition III.B.3.a.		X			These COMS requirements have been retained.
Condition III.B.4.a		X			This PM test requirement has been retained.
Condition III.B.4.b	X				This opacity test requirement has been removed because there is a COMS.
Condition III.C.1.a		X			This SO ₂ limit has been retained.
Condition III.C.1.b		X			This SO ₂ limit has been retained.
Condition III.C.1.c	X				This SO ₂ limit equation has been removed because it is unnecessary. The equation was to prorate the emission limit based on which fuel was being fired but both fuels have the same emission limit.
Condition III.C.2		X			This control equipment requirement has been retained.
Condition III.C.3.a		X			This CEMS requirement has been retained.
Condition III.C.3.b		X			These CEMS requirements have been retained.
Condition III.C.3.c		X			This reporting requirement has been retained.
Condition III.C.4		X			This SO ₂ testing requirement has been retained.
Condition III.D.1		X			These NO _x limitations have been retained.
Condition III.D.2		X			This NO _x testing requirement has been retained.
Condition IV.A.1		X			This fuel requirement has been retained.

Condition # in Permit # M170424P1-99	Determination				Comments
	Delete	Kept	Revise	Streamline	
Condition IV.A.2		X			These fuel requirements have been retained.
Condition IV.B.1			X		These opacity standards have been revised to include periods of natural gas usage.
Condition IV.B.2.a	X				The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.
Condition IV.B.2.b	X				The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.
Condition IV.B.3	X				The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.
Condition IV.C.1		X			This NO _x emission limitation has been retained.
Condition IV.C.2		X			This control equipment requirement has been retained.
Condition IV.C.3.a		X			These NO _x CEMS requirements have been retained.
Condition V		X			These CMS requirements have been retained.
Condition VI.A.1.a		X			This PM standard has been retained.
Condition VI.A.1.b			X		This opacity standard has been revised from 40% to 20%.
Condition VI.A.2		X			This control equipment requirement has been retained.
Condition VI.A.3		X			These monitoring and recordkeeping requirements have been retained.
Condition VII			X		These requirements for unclassified sources have been retained with the exception of a revision to the opacity standard from 40% to 20%.
Condition VIII			X		These general standards for non point sources have been updated.
Condition IX			X		These general standards for other periodic activities have been updated.

VIII. MONITORING AND RECORDKEEPING REQUIREMENTS

A. Facility Wide

1. Along with the semiannual compliance certification, the Permittee is required to submit reports of all recordkeeping and monitoring required by the permit.

2. The Permittee is required to maintain, on-site, records of the manufacturer's specifications or an Operation and Maintenance Plan for all equipment listed in the permit
3. The Permittee is required to maintain fuel supplier certifications to demonstrate that any fuel oil #2 used in permitted equipment has a sulfur content no greater than 0.05% by weight.

B. Power Boiler #1

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section II by having a Method 9 certified observer perform bi-weekly surveys of visible emission from Power Boiler #1 when firing fuel oil #2 and quarterly when firing natural gas. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard or baseline opacity level.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to keep records of any change to the baseline opacity level.
5. The Permittee is required to keep records of the total NO_x emitted to the atmosphere from Power Boiler #1 during each calendar year.

C. Power Boiler #2

1. The Permittee is required to keep a record of the rolling 12-month total of on-specification used oil combusted in Power Boiler #2.
2. The Permittee is required to keep records of the analyses performed on the used oil to demonstrate that the oil meets the definition of on-specification used oil.
3. The Permittee is required to show compliance with the opacity standard in Attachment "B", Section III by operating a COMS and recording the output.
4. The Permittee is required to keep records of the COMS performance reports and excess emission reports.
5. The Permittee is required to show compliance with the SO₂ standard in Attachment "B", Section III by operating SO₂ and O₂ CEMS and recording the output.
6. The Permittee is required to keep a record of the information used to convert the CEMS data into units of lb/MMBtu.
7. The Permittee is required to maintain a record of all SO₂ excess emissions from Power Boiler #2. Excess emissions for SO₂ are any three-hour period during which the average emission is greater 0.8 lbs/MMBtu.
8. The Permittee is required to keep records of the CEMS performance reports.

D. Power Boiler #3

1. The Permittee is required to maintain fuel receipts from the fuel supplier.
2. The Permittee is required to maintain a record of the amount and type of fuel combusted each day.
3. The Permittee is required to maintain individual 12-month rolling averages of the annual capacity factors for natural gas and distillate oil.
4. The Permittee is required to show compliance with the opacity standard in Attachment "B", Section IV by following an opacity testing schedule from NSPS Subpart Db.
5. The Permittee is required to maintain a record of all opacity excess emissions from Power Boiler #3. Excess emissions for opacity are any six-minute period during which the average opacity is greater than 20% except for one six-minute period per hour of 27%.
6. The Permittee is required to show compliance with the NO_x standards in Attachment "B", Section IV by operating a CEMS and maintaining a record of the output.
7. The Permittee is required to keep a record of the information used to convert the CEMS data into units of lb/MMBtu.
8. The Permittee is required to maintain a record of all NO_x excess emissions from Power Boiler #3. Excess emissions for NO_x are any 30-day period during which the average emission is greater 0.2 lbs/MMBtu.

E. Continuous Monitoring Systems (CMS)

1. The Permittee is required to maintain records of any period during which a CMS is inoperative.
2. The Permittee is required to maintain a file of all measurements including, continuous monitoring system, monitoring device, all continuous system performance evaluations, all continuous monitoring systems calibration checks, adjustments or maintenance performed on these systems or devices recorded in a permanent form suitable for inspection.

F. Coal Handling Facility

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VI by having a Method 9 certified observer perform a bi-weekly survey of visible emission from the coal handling facility. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 20%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

G. Internal Combustion Engines

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VII by having a Method 9 certified observer perform a quarterly survey of visible emission from the engines. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 40%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to keep records of maintenance performed on the engines and the hours of operation.
5. The Permittee is required to keep records of engine malfunctions.
6. The Permittee is required to operate and maintain the engines in accordance with manufacturer's emission-related written instructions or develop and follow a maintenance plan.

H. Unclassified Equipment

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VI by having a Method 9 certified observer perform a monthly survey of visible emission from the soda ash silo. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 20%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to maintain a record of maintenance performed on the soda ash silo baghouse

I. Gasoline Storage Tank

1. The Permittee is required to maintain records of the Reid pressure of the gasoline, dates of storage in the tank, and dates when the tank is empty.
2. The Permittee is required to maintain a record of average storage temperature and true vapor pressure of the gasoline.

J. Fugitive Dust

1. The Permittee is required to keep record of the dates on which any of the dust control measures contained in Attachment "B", Conditions XI.B.1.a.(3)(a) through XI.B.1.a.(3)(h) are employed.

2. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section XI by having a Method 9 certified observer perform a monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

G. Mobile Sources

The Permittee is required to keep records of all emission related maintenance performed on the mobile sources.

H. Periodic Activities

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, and quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

IX COMPLIANCE ASSURANCE MONITORING FOR POWER BOILER # 2:

A. Particulate Matter

1. Background
 - a. Emission Unit

Description:	Coal-Fired Power Boiler
Unit Identification:	Power Boiler #2
Air Pollution Control ID:	ESP 1 and ESP 2
Facility:	Catalyst Paper Mill
 - b. Applicable Regulation, Emissions Limit, and Monitoring Requirements

Regulation:	A.A.C. R18-2-901.2 (40 CFR 60, Subpart D)
Emission Limit:	PM < 0.1 lb/MMBtu
Monitoring Requirements:	COMS
 - c. Control Technology

Control Technology	Hot-Side Electrostatic Precipitators
--------------------	--------------------------------------

2. Monitoring Approach

The monitoring approach relies on the use of two indicators of ESP performance. One indicator is opacity. The second indicator is the secondary voltage and secondary current across each section of the ESP.

Opacity is an indicator of PM emissions. Historic particulate emissions test data and concurrent opacity monitoring data indicates that compliance with the applicable 20% opacity limit provides a significant margin for demonstrating continuous compliance with the applicable 0.1 lb/MMBtu PM limit. Based on historic PM testing results it was decided to set the opacity indicator range as 1 hour average opacity of less than 18% as recorded by the COMS.

The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP. The electrical parameters will be monitored on a continuous basis (at least once every 15 minutes), and a rolling 3-hour average will be recorded. In addition, if the 1 hour average opacity equals or exceeds 18% the unit operation status (load change increase or decrease) will be recorded.

All indicator ranges exclude periods of startup and shutdown.

If the 1-hour average opacity equals or exceeds 18%, and the electrical parameters are also outside the established 3-hour range, an excursion event will be recorded and reported. Corrective action will be taken to return all indicators to within their respective ranges.

3. Monitoring Approach Justification

Opacity was selected as the primary performance indicator because, as the opacity of emissions increases, it can be reasonably assumed that PM emissions increase. In addition, the facility has historically been required by permit to conduct annual PM testing, and past data indicates that the unit opacity limits provide a significant margin of compliance with the PM limits.

Electrical parameters (secondary current and voltage for each section of each ESP) were selected because they influence collection efficiency. If electrical parameters are outside their normal ranges, it can be assumed that ESP collection efficiency is not at optimum levels. The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP. The Permittee may periodically develop new parameters for different coal supplies, coal blends, or operating conditions. These will be submitted to ADEQ and EPA for approval 60 days prior to utilization.

CAM Plan for ESP

Indicator and its measurement approach	Opacity from the stack shall be the primary indicator and continuous opacity monitoring systems (COMS) will be used as the measurement approach. The secondary indicator will be the electrical parameters (current and voltage) for each section of each ESP.
--	--

Indicator Range	The indicator range for opacity will be over a 1-hour rolling average of less than 18% opacity. The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP.
Data representativeness	The data will represent normal operating conditions. This will exclude startup, shutdown, and malfunctions.
Verification of operational status	N/A
Quality assurance / quality control (QA/QC) practices and criteria	CPSI is required by the permit to meet the QA/QC requirements of 40 CFR 60, Appendix B, Performance Specification 1, "Specification and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources"
Monitoring Frequency	The COMS shall be in continuous operation and shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. The source will also monitor the electrical parameters on a continuous basis (at least once every 15 minutes) for each section of each ESP and record a rolling 3-hour average.
Data Collection Procedure	CPSI will reduce all data from the COMS to 6-minute averages. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period.
Averaging period	CPSI will be required to monitor the opacity over a 1-hour averaging period and the ESP data over a 3-hour period.

B. Sulfur Dioxide

The source is subject to the SO₂ standard of 0.8 lb/MMBtu in A.A.C. R18-2-903.1 while burning coal and the 0.8 lb/MMBtu standard of NSPS Subpart D while burning oil. Compliance test results indicate that the unit is able to meet the standard. The Permittee is required to operate a CEMS to demonstrate compliance with the emission limit and therefore CAM is not an applicable requirement. The monitoring system is required to meet the requirements of 40 CFR 60.13 and 40 CFR 60 Appendices B and F.

X. Testing Requirements

- A.** The Permittee is required to perform a Method 7 performance test for NO_x on Power Boiler #1 in the year following any year that the boiler exceeds 100 tons of NO_x emission.
- B.** The Permittee is required to perform a Method 6 performance test for SO₂ on Power Boiler #1 in the year following any year that the boiler exceeds 100 tons of SO₂ emission.
- C.** The Permittee is required to conduct an annual Method 5 test for PM on Power Boiler #2.
- D.** The Permittee is required to conduct an annual Method 7 test for NO_x on Power Boiler #2.

XI. Insignificant Activities

The Permittee has requested that the following activities be deemed as insignificant. According to A.A.C. R18-2-101.57 an activity is insignificant only if there are no applicable requirements for the activity. This was the basis used to determine if the activities in the following table qualify as an insignificant activity under Arizona law.

Table 5 –Activities Proposed as Insignificant by Permittee

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
1	Natural gas combustion sources which provide comfort heat.	Mill General	N/A	No	A.A.C. R18-2-724
2SN-MNT1-F001	Pulp Mill Maintenance Area	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
3SN-MNT1-F002	Main Maintenance Shop	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
4SN-MNT1-F003	Pump Shop	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
5SN-MNT1-F004	Power House Maintenance Shop	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
6SN-MNT1-F005	Roll Grinding room	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
7SN-MNT1-F006	Machine Room Maintenance Shop	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
8SN-MNT1-F008	Bag Plant Building	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
9SN-MNT1-F009	Instrument Shop	Mill General	N/A	Yes	A.A.C.R18-2-101.57.a
10SN-MNT1-F010	Technical Lab	Mill General	N/A	Yes	A.A.C.R18-2-101.57.i
11SN-MNT1-S007	Technical Lab	Mill General	N/A	Yes	A.A.C.R18-2-101.57.i
12SN-MNT1-T011	Diesel Fuel Tank – 10,000 gallons	Petroleum Storage Area	732-1014	Yes	A.A.C.R18-2-101.57.c Diesel storage tanks with capacity of 40,000 gallons or less.
13SN-MNT1-T012	Gasoline Fuel Tank – 4,000 gallons	Petroleum Storage Area 732	732-1015	No	A.A.C. R18-2-710
14SN-PAM1-M001	No. 1 News Blend Chest	#1 Paper Machine, Area 252	252-1034	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors.
15SN-PAM1-M002	No. 1 News machine Chest (contains water and paper fiber solution, no exterior vents)	#1 Paper Machine, Area 252	252-2724	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors.
16 SN-PAM1-M003	No. 1 News Broke Chest	#1 Paper Machine, Area 252	252-1069	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors.
16A	20 Ton News Broke Chest	#1 Paper Machine, Area 252	252-1050	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
16B	Off Machine Silo Tank	#1 Paper Machine, Area 252	252-0014	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16C	Flat Box Seal Tank	#1 Paper Machine, Area 252	252-0064	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16D	Primary Screen Rejects Standpipe	#1 Paper Machine, Area 252	252-1030	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16G	Deulator Receiver Tank	#1 Paper Machine, Area 252	252-1080	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution to be recycled back into the process.
16H	Primary Rejects Tank	#1 Paper Machine, Area 252	252-1030	Yes	A.A.C.R18-2-101.57.j Contains fine contaminants from the water and paper fiber solution.
16I	Tertiary Rejects Tank	#1 Paper Machine, Area 252	252-1086	Yes	A.A.C.R18-2-101.57.j Contains fine contaminants from the water and paper fiber solution.
16J	Couch Pit Tank	#1 Paper Machine, Area 252	252-1137	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16K	Wire Pit	#1 Paper Machine, Area 252	252-1060	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16L	Seal Pit Tank	#1 Paper Machine, Area 252	252-1180	Yes	A.A.C.R18-2-101.57.j
16M	Seal Pit Tank	#1 Paper Machine, Area 252	252-1181	Yes	A.A.C.R18-2-101.57.j
16N	Water Loading Tank Assemblies	#1 Paper Machine, Area 252	252-1216	Yes	A.A.C.R18-2-101.57.j
16O	Uhle Box Seal Pit Tank	#1 Paper Machine, Area 252	252-1228	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16P	Press Pit Tank	#1 Paper Machine, Area 252	252-1270	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
16Q	Air Receiver	#1 Paper Machine, Area 252	252-1332	Yes	A.A.C.R18-2-101.57.j Contains compressed ambient air.
16R	Condensate System Vacuum Receiver	#1 Paper Machine, Area 252	252-1461	Yes	A.A.C.R18-2-101.57.j Contains condensate from the steam going to the dryers.
16S	1 st Section Separator	#1 Paper Machine, Area 252	252-1462	Yes	A.A.C.R18-2-101.57.j Contains condensate from the steam going to the dryers.
16T	2 nd Section Separator	#1 Paper Machine, Area 252	252-1463	Yes	A.A.C.R18-2-101.57.j Contains condensate from the steam going to the dryers.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
16U	3 rd Section Separator	#1 Paper Machine, Area 252	252-1464	Yes	A.A.C.R18-2-101.57.j Contains condensate from the steam going to the dryers.
16V	Vacuum Seal Tank	#1 Paper Machine, Area 252	252-2010	Yes	A.A.C.R18-2-101.57.j Contains water to maintain seal on the vacuum system.
17SN-PAM1-S004	No. 1 False Ceiling Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
18SN-PAM1-S005	No. 1 False Ceiling Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
19SN-PAM1-S006	No. 1 PM Roof Exhaust Fan	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
20SN-PAM1-S007	PM No. 1 Roof Exhaust Fan	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
21SN-PAM1-S008	PM No. 1 Roof Exhaust Fan	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
22SN-PAM1-S009	No. 1 PM Dryer Hood Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
23SN-PAM1-S010	No. 1 PM Dryer Hood Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
24SN-PAM1-S011	No. 1 PM Dryer Hood Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
25SN-PAM1-S013	No. 1 PM Steam System Relief	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
26SN-PAM1-S014	PM No. 1 Steam System Relief	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
27SN-PAM1-S015	Vacuum Pump Exhaust PM 1 Set 2	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
28SN-PAM1-S016	PM 1&2 Vacuum Pump Exhaust	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
29SN-PAM1-V012	No. 1 PM Steam System Relief	#1 Paper Machine, Area 252		Yes	A.A.C.R18-2-101.57.j
29 A	Vacuum Pumps	#1 Paper Machine, Area 252	252-0051 252-0052 252-0053 252-0054 252-0055 252-0056 252-0057 252-1305 252-2610	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 1 Paper Machine paper Giver Solution.
29 B	Dry End Pulper	#1 Paper Machine Area 252	252-0119	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 C	Save-all	#1 Paper Machine Area 252	252-1076	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 D	Deculator	#1 Paper Machine Area 252	252-1076	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
29E	Primary Cleaners(22)	#1 Paper Machine Area 252	252-1026 252-1027 252-1028	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 F	Secondary Cleaners(4)	#1 Paper Machine Area 252	252-1046	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 G	Tertiary Cleaners(2)	#1 Paper Machine Area 252	252-1047	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 H	Quaternary Cleaners	#1 Paper Machine Area 252	252-1048	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29 I	Quinary Cleaners	#1 Paper Machine Area 252	252-1049	Yes	A.A.C.R18-2-101.57.j Contains water and Paper fiber solution, inside building, no exterior vents
29J	Bel Bond	#1 Paper Machine Area 252	252-1050	Yes	A.A.C.R18-2-101.57.j Forming Section of paper machine, paper fiber solution is sprayed on wire mesh and water is drawn off.
29 K	Vacuum Pit	#1 Paper Machine Area 252	252-1325	Yes	A.A.C.R18-2-101.57.j Contains water vapor from paper fiber solution.
29 L	Press	#1 Paper Machine Area 252	252-1400	Yes	A.A.C.R18-2-101.57.j The paper sheet is pressed and heated to reduce moisture and help formation. Water vapor from the paper fiber solution.
29 M	Second Dryer Section	#1 Paper Machine Area 252	252-1407	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.
29 N	Third Dryer Section	#1 Paper Machine Area 252	252-1413	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.
29O	Fourth Dryer Section	#1 Paper Machine Area 252	252-1423	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.
29 P	Winder	#1 Paper Machine Area 252	252-1600	Yes	A.A.C.R18-2-101.57.j Rewinds paper from reel to individual roles.
30 SN-PAM2-M016	Kraft Machine Chest	#2 Paper Machine Area 242	242-1001	Yes	A.A.C.R18-2-101.57.j Contains Water and Fiber Solution.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
30 A	Couch Pit Tank	#2 Paper Machine Area 242	252-2554	Yes	A.A.C.R18-2-101.57.j Contains Water and Fiber Solution.
30 B	Wire Pit tank	#2 Paper Machine Area 242	252-2564	Yes	A.A.C.R18-2-101.57.j Contains Water and Fiber Solution.
32 SN-PAM2-M018	40 Ton Kraft Broke Chest	#2 Paper Machine, Area 242	242-3106	Yes	A.A.C.R18-2-101.57.j Contains Water and Fiber Solution.
33 SN-PAM2-M021	Primary Headbox Surge Tank	#2 Paper Machine, Area 242	242-2518	Yes	A.A.C.R18-2-101.57.j Contains Water and Fiber Solution.
35 SN-PAM2-M023	Kraft Vacuum Seal Box	#2 Paper Machine, Area 242	242-2136	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 2 paper machine paper fiber solution.
36 SN-PAM2-M024	Kraft Primary Silo	#2 Paper Machine, Area 242	242-2583	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 2 paper machine paper fiber solution.
37 A	Secondary Silo Tank	#2 Paper Machine, Area 242	242-2587	Yes	A.A.C.R18-2-101.57.j Contains water and paper solution.
39 SN-PAM2-M027	Broke Chest	#2 Paper Machine, Area 242	242-0122	Yes	A.A.C.R18-2-101.57.j Contains water and paper solution.
40 SN-PAM2-M028	Saveall Cloudy Water Seal Tank	Corrugated Waste Area, Area 193	193-2170	Yes	A.A.C.R18-2-101.57.j
41 SN-PAM2-M029	Saveall Cloudy Water Seal Tank	Corrugated Waste Area, Area 193	193-2170	Yes	A.A.C.R18-2-101.57.j
42 SN-PAM2-M030	White Water Collection Tank	#2 Paper Machine, Area 242	242-4026	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
46 SN-PAM2-M036	Fresh Water Showers Tank	#2 Paper Machine, Area 242	242-3102	Yes	A.A.C.R18-2-101.57.j
46 A	Dryer Lube Oil Tank	#2 Paper Machine, Area 242	242-3350	Yes	A.A.C.R18-2-101.57.c It is less than 10,000 gallons.
47 SN-PAM2-M037	Seal Tank Separator	#2 Paper Machine, Area 242	242-3371 242-3372 242-3373 242-3374 242-3375 242-3376	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
47 A	Vacuum Separator Tank	#2 Paper Machine, Area 242	242-2752	Yes	A.A.C.R18-2-101.57.j
48 SN-PAM2-M038	Condensate Flash Tank	#2 Paper Machine, Area 242	242-2785	Yes	A.A.C.R18-2-101.57.j Contains steam condensate in a sealed tank with no vents.
49SN-PAM2-M039	Primary Settling Tank	Petroleum Storage, Area 752	752-1050	Yes	A.A.C.R18-2-101.57.j
50SN-PAM2-M040	Lube Oil Tank	Petroleum Storage, Area 752	752-1053	Yes	A.A.C.R18-2-101.57.j
50 B	Primary Settling Tank	Petroleum Storage, Area 752	242-0589	Yes	A.A.C.R18-2-101.57.j
50 C	Pump Tank	Petroleum Storage, Area 752	242-0590	Yes	A.A.C.R18-2-101.57.j Roll grind cooling water

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
50 D	Way Lube	Petroleum Storage, Area 752	752-0595	Yes	A.A.C.R18-2-101.57.j
50 E	Petroleum Storage	Petroleum Storage, Area 752	752-1034	Yes	A.A.C.R18-2-101.57.j
51 SN-PAM2-S015	Dry End Area Exhaust	#2 Paper Machine, area 242	-	Yes	A.A.C.R18-2-101.57.j
51 A	Primary Screen	#2 Paper Machine, Area 242	242-2505	Yes	A.A.C.R18-2-101.57.j Contains Water and paper fiber solution.
51 B	Primary Head Box	#2 Paper Machine, Area 242	242-2530	Yes	A.A.C.R18-2-101.57.j Forming Section of the Paper Machine, Paper fiber is sprayed on a wire mesh and water is drawn off.
51 C	Vacuum Pump (7)	#2 Paper Machine, Area 242	242-2668 242-2669 242-2670 242-2671 242-2650 242-2733 242-2750	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 2 paper machine.
51 D	Fourdiner	#2 Paper Machine, Area 242	242-2626	Yes	A.A.C.R18-2-101.57.j Forming section of paper machine, paper solution is sprayed on a wire mesh and water is drawn off.
51 E	First Press	#2 Paper Machine, Area 242	242-2690	Yes	A.A.C.R18-2-101.57.j The paper sheet is pressed and heated to reduce moisture.
51 F	Second Press	#2 Paper Machine, Area 242	242-2701	Yes	A.A.C.R18-2-101.57.j The paper sheet is pressed and heated to reduce moisture.
51 G	Third Press	#2 Paper Machine, Area 242	242-2725	Yes	A.A.C.R18-2-101.57.j The paper sheet is pressed and heated to reduce moisture.
51 H	First Dryer Section(1-5)	#2 Paper Machine, Area 242	242-2761	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
51 I	Second Dryer Section(6-19)	#2 Paper Machine, Area 242	242-2791	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
51 J	Third Dryer Section (20-35)	#2 Paper Machine, Area 242	242-2821	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
51 K	Fourth Dryer Section (36-48)	#2 Paper Machine, Area 242	242-2840	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
51 L	Fifth Dryer Section (37-47)	#2 Paper Machine, Area 242	242-2840	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
51 M	Sixth Dryer Section (37-47)	#2 Paper Machine, Area 242	242-2840	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
51 N	Winder	#2 Paper Machine, Area 242	242-3000	Yes	A.A.C.R18-2-101.57.j Rewinds paper from reel to individual rolls. There are no emissions.
52SN-PAM3-M001	No. 3 News Blend Chest	# 3 Paper Machine area, Area 262	262-0097	Yes	A.A.C.R18-2-101.57.j, Contains only paper fiber and water solution.
53SN-PAM3-M002	No. 3 News Machine Chest	# 3 Paper Machine area, Area 262	262-0107	Yes	A.A.C.R18-2-101.57.j, Contains only paper fiber and water solution.
54SN-PAM3-M003	No. 3 News Saveall Chest	# 3 Paper Machine area, Area 262	262-0042	Yes	A.A.C.R18-2-101.57.j, Contains only paper fiber and water solution.
54 A	Felt Wash Bulk Storage, Tank #1	# 3 Paper Machine area, Area 262	262-0057	Yes	A.A.C.R18-2-101.57.j
54 B	Felt Wash Bulk Storage, Tank #1	# 3 Paper Machine area, Area 262	262-0058	Yes	A.A.C.R18-2-101.57.j
54 C	Main Lube System Tank	# 3 Paper Machine area, Area 262	262-0481	Yes	A.A.C.R18-2-101.57.j
54 D	Felt Wash Mix, Tank #1	# 3 Paper Machine area, Area 262	262-0181	Yes	A.A.C.R18-2-101.57.j
55SN-PAM3-S004	No. 3 PM Wet End Area Exhaust	# 3 Paper Machine area, Area 262	-	Yes	A.A.C.R18-2-101.57.j
56SN-PAM3-S005	No. 3 PM Wet End Area Exhaust	# 3 Paper Machine area, Area 262-	-	Yes	A.A.C.R18-2-101.57.j
57SN-PAM3-S006	No. 3 PM Press Sec. Area Exhaust	# 3 Paper Machine area, Area 262	-	Yes	A.A.C.R18-2-101.57.j
58SN-PAM3-S007	No. 3 PM Press Sec. Area Exhaust	# 3 Paper Machine area, Area 262	-	Yes	A.A.C.R18-2-101.57.j
59SN-PAM3-S008	No. 3 PM Dry End Area Exhaust	# 3 Paper Machine area, Area 262	-	Yes	A.A.C.R18-2-101.57.j
60SN-PAM3-S009	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
61SN-PAM3-S010	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
62SN-PAM3-S011	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
63SN-PAM3-S012	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
64SN-PAM3-S013	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
65SN-PAM3-S015	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
66 SN-PAM3-S016	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
67 SN-PAM3-S017	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
68 SN-PAM3-S018	No. 3 PM Dry End Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
69 SN-PAM3-S019	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
70 SN-PAM3-S021	No. 3 PM Dry End Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
71 SN-PAM3-S022	No. 3 PM Dry End Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
72 SN-PAM3-S023	No. 3 PM Roof Access Door	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
73 SN-PAM3-S024	No.3 PM Vacuum Pump Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
74 SN-PAM3-V014	No. 3 PM Area Roof Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
75 SN-PAM3-V020	No. 3 PM Dry End Exhaust	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
76 SN-PAM3-V025	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
77 SN-PAM3-V026	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
78 SN-PAM3-V027	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
79 SN-PAM3-V028	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
80 SN-PAM3-V029	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
81 SN-PAM3-V030	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
82 SN-PAM3-V031	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
83 SN-PAM3-V032	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
84 SN-PAM3-V033	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
85 SN-PAM3-V034	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
86 SN-PAM3-V035	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
87 SN-PAM3-V036	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
88 SN-PAM3-V037	No. 3 Pm Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
89 SN-PAM3-V038	No. 3 PM Steam System Relief	# 3 Paper Machine area, Area 262		Yes	A.A.C.R18-2-101.57.j
91 SN-PAM4-M003	Low Density Chest			Yes	A.A.C.R18-2-101.57.j Contains Water and Paper Fiber Solution.
93 SN-PAM4-M005	#3 Deinking 400 ton high density storage tank	#3 Deinking, Area 194	194-0053	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
94 SN-PAM4-M006	No. 2 D. I. High Density Stock Chest	#2 Deinking, Area 192	191-2779	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
95 SN-PAM4-M007	News Clarified Whitewater Chest	#1 Paper Machine, Area 252	252-1042	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 1 & 3 paper machine.
96 SN-PAM4-M008	News Water Reclaim Tank	#1 Paper Machine, Area 252	252-0202	Yes	A.A.C.R18-2-101.57.j Contains recycled water from no. 1 & 3 paper machine.
97 SN-PAM4-M009	News Off-Machine Silo	#3 Paper Machine, Area 262	262-0132	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 3 Paper machine.
97 A	Deculator Receiver	#3 Paper Machine, Area 262	262-0147	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
97 B	Saveall	#3 Paper Machine, Area 262	262-0042	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
98 SN-PAM4-M010	Deculator White Water Chest	#1 Paper Machine Area, Area 252	252-1039	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 3 Paper machine.
100 SN-PAM4-M013	No. 1 Wet End Additive Tank	#1 Paper Machine, Area 252	252-1347	Yes	A.A.C.R18-2-101.57.j
101 SN-PAM4-M014	No. 2 Wet End Additive Tank	#1 Paper Machine, Area 252	252-1349	Yes	A.A.C.R18-2-101.57.j
102 SN-PAM4-M016	Seal Tank For North Sweat Dryer	#3 Deinking , Area 194	292-0370	Yes	A.A.C.R18-2-101.57.j Contains steam condensate.
103 SN-PAM4-M017	Drainage System Flash Tank	#3 Paper Machine, Area 262	262-0476	Yes	A.A.C.R18-2-101.57.j Contains steam condensate.
107 SN-PAM4-S031	Cafeteria or Lab Exhaust			Yes	A.A.C.R18-2-101.57.i
108 SN-PAM4-T015	Sulfuric Acid Tank	#2 Paper Machine, Area 242	242-1104 & 1110	Yes	A.A.C.R18-2-101.57.j
109 A	Primary Cleaners (235)	#3 Paper Machine, Area 262	262-0148	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
109 B	Secondary Cleaners (59)	#3 Paper Machine, Area 262	262-1049	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
109 C	Tertiary Cleaners (26)	#3 Paper Machine, Area 262	262-0150	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
109 D	Quaternary Cleaners (8)	#3 Paper Machine, Area 262	262-0151	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
109 E	Primary Screens (3)	#3 Paper Machine, Area 262	262-0141 262-0142 262-0143	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
109 F	Secondary Screens (3)	#3 Paper Machine, Area 262	262-0180	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
109 G	Tertiary Screens (3)	#3 Paper Machine, Area 262	262-0173	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
109 H	Bel Baie Former	#3 Paper Machine, Area 262	262-0205	Yes	A.A.C.R18-2-101.57.j Forming Section of Paper Machine
109 I	Vacuum Pumps	#3 Paper Machine, Area 262	262-0326 262-0327 262-0328 262-0329 262-0330 262-0331 262-0332 262-0333 262-0334	Yes	A.A.C.R18-2-101.57.j Contain recycled water from No. 3 paper machine.
109 J	First Dryer Section (2)	#3 Paper Machine, Area 262	262-0356 262-0364	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
109 K	Third Dryer Section	#3 Paper Machine, Area 262	262-0367	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
109 L	Fourth Dryer Section	#3 Paper Machine, Area 262	262-0368	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated to reduce moisture.
109 M	Press Section	#3 Paper Machine, Area 262	262-0275	Yes	A.A.C.R18-2-101.57.j The paper sheet is heated and pressed to reduce moisture.
109 N	Repulper	#3 Paper Machine, Area 262	262-0500	Yes	A.A.C.R18-2-101.57.j Contains water and fiber solution.
110 A	Saveall Clear Side Seal Tank Chest	#3 Paper Machine, Area 262	262-0501	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 3 Paper Machine.
110 B	Saveall Cloudy Side Seal Tank Chest	#3 Paper Machine, Area 262	262-0502	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 3 Paper Machine.
110 C	Saveall Stock Chest	#3 Paper Machine, Area 262	262-0081	Yes	A.A.C.R18-2-101.57.j Contains water and fiber solution.
110 D	Wire Pit Tank	#3 Paper Machine, Area 262	262-0131	Yes	A.A.C.R18-2-101.57.j Contains water and fiber solution.
110 E	Primary Screen Reject Tanks	#3 Paper Machine, Area 262	262-0143	Yes	A.A.C.R18-2-101.57.j Contains fine rejects from the water and paper solution.
110 F	White Water Chest	#3 Paper Machine, Area 262	262-0071 262-0076 262-0265	Yes	A.A.C.R18-2-101.57.j Contains recycled water from No. 3 paper machine.
110 G	Fresh Water Shower Tank	#3 Paper Machine, Area 262	262-0312	Yes	A.A.C.R18-2-101.57.j
110 H	Couch Pit Tank	#3 Paper Machine, Area 262	262-0315	Yes	A.A.C.R18-2-101.57.j Contains water and paper solution.
110 I	Press Pit Tank	#3 Paper Machine, Area 262	262-0304	Yes	A.A.C.R18-2-101.57.j Contains water and paper solution.
110 J	Sump Station #1 Tank	#3 Paper Machine, Area 262	262-0490	Yes	A.A.C.R18-2-101.57.j
110 K	#2 Air Compressor Receiver	#3 Paper Machine, Area 262	262-0499	Yes	A.A.C.R18-2-101.57.j Contains compressed ambient air.
110 L	Broughton Oscillator Supply Tank	#3 Paper Machine, Area 262	262-0640	Yes	A.A.C.R18-2-101.57.j
111 SN-PAM4-T020	Dye System Tank	#3 Paper Machine, Area 262	A6262106-001	Yes	A.A.C.R18-2-101.57.j
112 SN-PAM4-T021	Dye System Tank	#3 Paper Machine, Area 262	A6262106-002	Yes	A.A.C.R18-2-101.57.j
114 A	Dispersion #1 Tank (Talc Mix Tank)	#3 Paper Machine, Area 262	262-2117	Yes	A.A.C.R18-2-101.57.j
114 B	Dispersion #2 Tank (Talc Mix Tank)	#3 Paper Machine, Area 262	262-2120	Yes	A.A.C.R18-2-101.57.j
114 C	Supply Tank (Talc)	#3 Paper Machine, Area 262	262-0623	Yes	A.A.C.R18-2-101.57.j
114 D	Concentrate Polymer Retention Aid Tank	#3 Paper Machine, Area 262	262-2259	Yes	A.A.C.R18-2-101.57.j
115 SN-PAM4-T029	Rosin Size Storage Tank	#2 Paper Machine, Area 252	252-1835	Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
116 SN-PAM4-T030	Emulsified Rosin Storage Tank	#2 Paper Machine, Area 252	252-1835	Yes	A.A.C.R18-2-101.57.j
117 SN-PAM4-M002	Pulper Dump Chest	Old Corrugated Container Area	191-2517	Yes	A.A.C.R18-2-101.57.j
119 SN-PRC1-M004	OCC Decker Filtrate	Old Corrugated Area, Area 191	191-1265	Yes	A.A.C.R18-2-101.57.j
120 SN-PRC1-M005	OCC Decker Filtrate Chest	Old Corrugated Area, Area 191	191-1265	Yes	A.A.C.R18-2-101.57.j
121 SN-PRC1-M006	OCC Primary Coarse Screen Feed Chest	Old Corrugated Container, Area 191	191-2550	Yes	A.A.C.R18-2-101.57.j
122 SN-PRC1-M007	OCC Bel-Shear Feed Chest	Old Corrugated Container, Area 191	191-2550	Yes	A.A.C.R18-2-101.57.j
123 A	Secondary Uniflow Cleaners Feed Tank	Old Corrugated Container, Area 191	191-2704	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
123 B	Secondary Posiflow Feed Chest	Old Corrugated Container, Area 191	191-2730	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
123 C	Decker Accept Chest	Old Corrugated Container, Area 191	191-2757	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
123 D	OCC Low Density Stock Tank	Old Corrugated Container, Area 191	191-3111	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
123 E	OCC High Density Stock Tank	Old Corrugated Container, Area 191	191-1022	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
126 SN-PRC1-M011	Tertiary Forward Cleaner Reject and Secondary Reverse Cleaners Reject	Old Corrugated Container, Area 191	191-2666	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
128 SN-PRC1-M013	Sec. Posiflow Cleaner Rejects Tank	Old Corrugated Container, Area 191	191-2720	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
134 SN-PRC1-S030	OCC Building Area Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
134 A	Junk Tower, #1 DI Pulper Standby use	Old Corrugated Container, Area 191	191-1055	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution.
135 SN-PRC1-S031	OCC North Building Area Vent	Old Corrugated Container, Area 191	191-2720	Yes	A.A.C.R18-2-101.57.j
136 SN-PRC1-S032	OCC North Building Area Vent	Old Corrugated Container, Area 191	191-2720	Yes	A.A.C.R18-2-101.57.j
137 SN-PRC1-T019	No. 1 Caustic Mix Tank	Old Corrugated Container, Area 191	191-1526	Yes	A.A.C.R18-2-101.57.j
138 SN-PRC1-T020	No. 2 Caustic Mix Tank	Old Corrugated Container, Area 191	191-1533	Yes	A.A.C.R18-2-101.57.j
139 SN-PRC1-T021	No. 1 Hydrogen Peroxide Tank	Old Corrugated Container, Area 191	191-1550	Yes	A.A.C.R18-2-101.57.j
140 SN-PRC1-T022	No.2 Hydrogen Peroxide Tank	Old Corrugated Container, Area 191	191-1551	Yes	A.A.C.R18-2-101.57.j
141 SN-PRC1-T023	No.1 D. I. Soap Storage Tank	Old Corrugated Container, Area 191	191-1008	Yes	A.A.C.R18-2-101.57.j
142 SN-PRC1-V001	No. 1 D. I. Pulper Vent			Yes	A.A.C.R18-2-101.57.j
143 SN-PRC1-V024	OCC North Building Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
144 SN-PRC1-T025	OCC North Building Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
145 SN-PRC1-V026	No. 2 Paper Machine Disc Saveall Vent			Yes	A.A.C.R18-2-101.57.j
146 SN-PRC1-V027	OCC Decker Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
147 SN-PRC1-V028	OCC South Building Area Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
148 SN-PRC1-V029	OCC South Building Area Vent	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
149 SN-PRC1-M006	OCC Decker Filtrate Chest	Old Corrugated Container, Area 191		Yes	A.A.C.R18-2-101.57.j
150 SN-PRC1-M007	OCC Clarifier Water Chest	Old Corrugated Container, Area 191	191-2711	Yes	A.A.C.R18-2-101.57.j
152 SN-PRC2-M009	Clarifier Water Chest	#2 Deinking, Area 192	192-3224	Yes	A.A.C.R18-2-101.57.j
153 SN-PRC2-M010	Clarifier Feed Chest	#2 Deinking, Area 192	192-3221	Yes	A.A.C.R18-2-101.57.j
157 SN-PRC2-M014	Stillwell Tank	#2 Deinking, Area 192	192-3221	Yes	A.A.C.R18-2-101.57.j
160 A	Tertiary Fine Screen Feed Tank	#2 Deinking, Area 192	192-1530	Yes	A.A.C.R18-2-101.57.j Contains water and fiber solution.
160 B	#2 DI Junk Tower	#2 Deinking, Area 192	192-3018	Yes	A.A.C.R18-2-101.57.j Contains large metal contaminates from the process, cans, wire and coins.
160 C	Coarse Screen Dilution Chest	#2 Deinking, Area 192	192-3088	Yes	A.A.C.R18-2-101.57.j Contains water from paper fiber solution
160 D	Beloit Cleaner Feed Chest	#2 Deinking, Area 192	192-3095 Contains water from paper fiber solution	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution
160 E	Secondary Fine Screen Dilution Chest	#2 Deinking, Area 192	192-3097	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution
160 F	Primary Fine Screen Dilution Chest	#2 Deinking, Area 192	192-3112	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution
160 G	Primary Coarse Screen Rejects Chest	#2 Deinking, Area 192	192-3126 Contains water from paper fiber solution	Yes	A.A.C.R18-2-101.57.j Contains coarse rejects from the paper fiber solution
160 H	Cleaner Dilution Chest	#2 Deinking, Area 192	192-3131	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution
160 I	GSC Floatation Dilution chest	#2 Deinking, Area 192	192-3141	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution
160 J	Secondary Forward Cleaner Rejects Tank	#2 Deinking, Area 192	192-3144	Yes	A.A.C.R18-2-101.57.j Contains recycled water from the paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
160 K	Primary Forward Cleaner Rejects Tank	#2 Deinking, Area 192	192-3095	Yes	A.A.C.R18-2-101.57.j Contains rejects from the water and paper fiber solution.
160 L	Tertiary Forward Cleaner Rejects Chest	#2 Deinking, Area 192	192-3153 Contains water from paper fiber solution	Yes	A.A.C.R18-2-101.57.j Contains rejects from the water and paper fiber solution.
160 M	Secondary Stage Washer	#2 Deinking, Area 192	192-3177	Yes	A.A.C.R18-2-101.57.j Contains water from the paper fiber solution
161 A	Dewirer Machine	#2 Deinking, Area 192	192-1501	Yes	A.A.C.R18-2-101.57.j Contains wire on bales of paper.
161 B	Bale Breaker	#2 Deinking, Area 192	192-1505	Yes	A.A.C.R18-2-101.57.j
161 C	Pulper	#2 Deinking, Area 192	192-1509	Yes	A.A.C.R18-2-101.57.j Contains water paper fiber solution
161 D	Vat Pulper (2)	#2 Deinking, Area 192	192-1046 192-3009	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
161E	High Density Cleaners (4)	#2 Deinking, Area 192	192-3026 192-3027 192-1510 192-1510	Yes	A.A.C.R18-2-101.57.j Contains water from the paper fiber solution
161 F	Vibrating Screens (2)	#2 Deinking, Area 192	192-3040 192-3043	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
161 G	Barrier Screen	#2 Deinking, Area 192	192-3030	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
161 H	Primary Coarse Screen	#2 Deinking, Area 192	192-3117	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 A	Secondary Coarse Screen	#2 Deinking, Area 192	192-3120	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 B	Tertiary Coarse Screen	#2 Deinking, Area 192	192-3174	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 C	GSC Floatation Cell	#2 Deinking, Area 192	192-1513	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 D	Reverse Cleaners (3 Stages)	#2 Deinking, Area 192	192-1514 192-1518 192-1519 192-1516	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 E	Forward Cleaners (4 Stages)	#2 Deinking, Area 192	192-3117	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
162 F	Fine Screens (4 stages)	#2 Deinking, Area 192	192-1521 192-1522 192-1523 192-1550 192-1551 192-3413	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 G	Deckers (6)	#2 Deinking, Area 192	192-3156 192-3159 192-3162 192-3165 192-3255 192-3258	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 H	Predrainer (6)	#2 Deinking, Area 192	192-3184 192-3191 192-3198 192-3205 192-3212 192-3331	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 I	WEMCO Flootation Cell (4)	#2 Deinking, Area 192	192-3840 192-3850 192-3860 192-3870	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 J	WEMCO Flootation Cell	#2 Deinking, Area 192	192-3880	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
162 K	Clarifier	#2 Deinking, Area 192	192-1524	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
163 SN-PRC2-M036	Borol Water Surge Tank	#2 Deinking, Area 192	192-2118	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
164 SN-PRC2-M037	Borol Degas Tank	#2 Deinking, Area 192	192-2130	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
165 SN-PRC2-M038	Borol Hydrosulfite Bleach Tank	#2 Deinking, Area 192	192-2145	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
166 SN-PRC2-S002	No. 2 D. I. South Building Wall Fan	#2 Deinking, Area 192		Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
167 SN-PRC2-S003	No. 2 D. I. South Building Wall Fan	#2 Deinking, Area 192		Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
168 SN-PRC2-S004	No. 2 D. I. South Building Wall Fan	#2 Deinking, Area 192		Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
170 SN-PRC2-T005	No. 2 D. I. Pulper Dump Chest	#2 Deinking, Area 192	192-3044	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
171 SN-PRC2-T020	Sodium Bisulfite Storage Tank	#2 Deinking, Area 192	192-2160	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
172 SN-PRC2-T021	DTPA Storage Tank	#2 Deinking, Area 192	192-3269	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
174 SN-PRC2-T023	Silicate Storage Tank	#2 Deinking, Area 192	192-3278	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
175 SN-PRC2-T024	No. 2 D. I. Soap Storage Tank	#2 Deinking, Area 192	192-3283	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
176 SN-PRC2-T025	Poly I Storage Tank	#2 Deinking, Area 192	192-3291	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
177 SN-PRC2-T026	Poly II Make up Tank	#2 Deinking, Area 192	192-3297	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
183 SN-PRC2-T032	Borol Solution Storage Tank	#2 Deinking, Area 192	192-2101	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
184 SN-PRC2-V001	No. 2 D. I. South Building Area Vent	#2 Deinking, Area 192		Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
185 SN-PRC2-V039	No. 2 D. I. Restroom Fan	#2 Deinking, Area 192		Yes	A.A.C.R18-2-101.57.j
186 SN-PRC3-M003	Primary Screen Rejects Tank	#3 Deinking, Area 194	194-0315	Yes	A.A.C.R18-2-101.57.j Contains water from Deinking process.
187 SN-PRC3-M004	No. 3D.I. Fine Screen Dilution Tank	#3 Deinking, Area 194	194-0180	Yes	A.A.C.R18-2-101.57.j Contains water from deinking process.
188 SN-PRC3-M005	Clear Filtrate Chest Cloudy Filtrate Chest Cloudy Filtrate Tank	#3 Deinking, Area 194	194-0415 194-0420 194-0052	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 SN-PRC3-M006	High Density Stock Chest	#3 Deinking, Area 194	194-0001	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 A	High Density Cleaner Transfer	#3 Deinking, Area 194	194-0087	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 B	Medium Density Cleaner Transfer	#3 Deinking, Area 194	194-0137	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 C	High Density Cleaners (6, 3 used at any one time)	#3 Deinking, Area 194	194-0140 194-0145 194-0150 194-0155 194-0160 194-0165	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 D	Coarse Screens (3 stages)	#3 Deinking, Area 194	194-0115 194-0120 194-0335 194-0345	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 E	Forward Cleaners (4 Stages)	#3 Deinking, Area 194	194-0520 194-0523 194-0524 194-0515	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
189 F	Reverse Cleaners	#3 Deinking, Area 194	194-0215 194-0220 194-0225 194-0230 194-0235 194-0240 194-0255	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 G	Fine Screens (3 Stages)	#3 Deinking, Area 194	194-0170 194-0528 194-0529 194-0175 194-0190 194-0200	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
189 H	Disk Thickener	#3 Deinking, Area 194	194-0260	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 SN-PRC3-M007	High Density Stock Surge Chest	#3 Deinking, Area 194	194-0007	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 A	Primary Forward Cleaner Chest	#3 Deinking, Area 194	194-0100	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 B	Thick Stock Pump Standpipe	#3 Deinking, Area 194	194-0300	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 C	#2 & #3 Deinking Fine Screen Rejects Tank	#3 Deinking, Area 194	194-0375	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 D	#1 to 4 GSC Flootation Cells	#3 Deinking, Area 194	194-0054 194-0055 194-0056 194-0057	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
190 E	GSC Flootation Cell Reject Tank	#3 Deinking, Area 194	194-0051	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
191 SN-PRC3-T002	Pulper Dump Chest	#2 Deinking, Area 192	192-0100	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 SN-PRC3-V001	Waste Corrugated Pulper Vent	Waste Corrugated Area 193	193-2042	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 A	Waste Corrugated Pulper Feed Conveyor	Corrugated Waste, Area 193	193-2030	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 B	Turbo Separator	Corrugated Waste, Area 193	193-2180	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 C	OCC #2 Conveyor	Old Corrugated Container, Area 191	194-0015	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 D	OCC #2 Pulper	Old Corrugated Container, Area 191	194-0020	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 E	Detrasher	Old Corrugated Container, Area 191	194-0075	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
192 F	High Density Cleaners, (2)	Old Corrugated Container, Area 191	194-0090 194-0095	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 G	Primary Coarse Screen	Old Corrugated Container, Area 191	191-2564	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 H	Secondary Coarse Screen	Old Corrugated Container, Area 191	191-2568	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 I	Tertiary Coarse Screen	Old Corrugated Container, Area 191	191-0504	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 J	Detrashing Screen	Old Corrugated Container, Area 191	191-0542	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 K	Quaternary Cleaner	Old Corrugated Container, Area 191	191-0526	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 L	Primary Fine Screens (2)	Old Corrugated Container, Area 191	191-2602 191-2605	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 M	Secondary Fine Screen	Old Corrugated Container, Area 191	194-0015	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 N	Tertiary Fine Screen	Old Corrugated Container, Area 191	191-0508	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 O	Primary Reverse Cleaners	Old Corrugated Container, Area 191	191-2700 191-2701 191-2702 191-2703 191-0509	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 P	Secondary Reverse Cleaners	Old Corrugated Container, Area 191	191-2710	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 Q	Primary Forward Cleaners	Old Corrugated Container, Area 191	191-2716 191-2717 191-2718 191-2719	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 R	Secondary Forward Cleaners	Old Corrugated Container, Area 191	191-0510	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 S	Tertiary Forward Cleaners	Old Corrugated Container, Area 191	191-2726	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 T	Deckers	Old Corrugated Container, Area 191	191-1242 191-1247 191-1252 191-1256	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 U	Deckers #5	Old Corrugated Container, Area 191	191-2752	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution
192 V	Clarifier	Old Corrugated Container, Area 191	194-1275	Yes	A.A.C.R18-2-101.57.j Contains water and paper fiber solution

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
193 SN-PSG0-M001	Condensate Blow Down Tank	Power House, Area 411	411-1111	Yes	A.A.C.R18-2-101.57.j Contains condensate and steam from the boilers.
194 SN-PSG0-M002	Condensate Blow down Flash Tank	Power House, Area 411	411-1112	Yes	A.A.C.R18-2-101.57.j Contains condensate and steam from the boilers.
195 SN-PSG0-M003	Unload Blow Down Flash Tank	Power House, Area 412	412-6321	Yes	A.A.C.R18-2-101.57.j Contains condensate and steam from the boilers.
195 A	Ash Sluice Tank	Power House, Area 412	412-3001		A.A.C.R18-2-101.57.j
196 A	Deaerator Heater	Power House, Area 442	442-1050	Yes	A.A.C.R18-2-101.57.j Contains condensate and steam from the boilers.
196 B	Deaerator Heater	Power House, Area 442	442-1306	Yes	A.A.C.R18-2-101.57.j Contains condensate and steam from the boilers.
199 SN-PSG0-M018	No.2 Power Boiler Scrubber Recycle Tank	Power House, Area 412	412-3092	Yes	A.A.C.R18-2-101.57.j
199 A	PH Sample Pot	Power House, Area 412	412-3091	Yes	A.A.C.R18-2-101.57.j
199 B	Soda Ash Silo	Power House, Area 412	412-3110	No	A.A.C. R18-2-730
199 C	Dilution Tank	Power House, Area 412	412-3118	Yes	A.A.C.R18-2-101.57.j
199 D	Reagent Solution Storage Tank	Power House, Area 412	412-3119	Yes	A.A.C.R18-2-101.57.j
199 E	SO ₂ Scrubber absorber	Power House, Area 412	412-3141	Yes	A.A.C.R18-2-101.57.j
199 F	Clarifier Overflow Surge Tank	Power House, Area 412	412-3146	Yes	A.A.C.R18-2-101.57.j
199 G	SO ₂ Scrubber absorber	Power House, Area 412	442-3089	Yes	A.A.C.R18-2-101.57.j
200 SN-PSG0-M019	Condensate Collection Tank	Power House, Area 442	442-1400	Yes	A.A.C.R18-2-101.57.j
201 A	#1 Demineralized Water Storage Tank	Power House, Area 442	442-1330	Yes	A.A.C.R18-2-101.57.j
201 B	#2 Demineralized Water Storage Tank	Power House, Area 442	442-1310	Yes	A.A.C.R18-2-101.57.j
202 SN-PSG0-M023	Bearing Water Collection Tank	Power House, Area 442	442-1186	Yes	A.A.C.R18-2-101.57.j
203 SN-PSG0-T004	No. 1 Weak Base Anion	Power House, Area 442	442-1150 Sealed Pressure vessel	Yes	A.A.C.R18-2-101.57.j
204 SN-PSG0-T005	No. 2 Weak Base Anion	Power House, Area 442	442-1151	Yes	A.A.C.R18-2-101.57.j
205 SN-PSG0-T006	Reclaimed Caustic Tank	Power House, Area 442	442-1155	Yes	A.A.C.R18-2-101.57.j
206 SN-PSG0-T007	No. 1 Weak Acid Cation Tank	Power House, Area 442	442-1160	Yes	A.A.C.R18-2-101.57.j
207 SN-PSG0-T008	No. 2 Weak Acid Cation Tank	Power House, Area 442	442-1161	Yes	A.A.C.R18-2-101.57.j
209 SN-PSG0-T011	Cation Demineralizer Tank (4)	Power House, Area 442	442-1350 442-1351 442-1352 442-1349	Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
210 SN-PSG0-T012	Anion Demineralizer Tank	Power House, Area 442	442-1353 442-1354 442-1355 442-1356	Yes	A.A.C.R18-2-101.57.j
211 SN-PSG0-T013	Chemical Feed Tank (#1 Boiler Feed Water)	Power House, Area 442	442-1100	Yes	A.A.C.R18-2-101.57.j
212 SN-PSG0-T014	Sulfuric Acid Storage Tank	Power House, Area 442	442-1300	Yes	A.A.C.R18-2-101.57.j
214 SN-PSG0-T020	No.1 Caustic Storage Tank	Power House, Area 442	442-1301	Yes	A.A.C.R18-2-101.57.j
215 SN-PSG0-T021	No.2 Caustic Storage Tank	Power House, Area 442	442-1302	Yes	A.A.C.R18-2-101.57.j
216 SN-PSG2-S003	No. 2 Power Boiler By-Pass Stack			No	40 CFR 60 Subpart D
217 SN-PSG2-T016	No. 2 Power Boiler Chemical Feed Tank	Power House, Area 442	442-1104	Yes	A.A.C.R18-2-101.57.j
217 A	Phosphate Feed Tank	Power House, Area 442	442-1303	Yes	A.A.C.R18-2-101.57.j
217 B	Lube Oil Tank	Power House, Area 451	451-1005	Yes	A.A.C.R18-2-101.57.j
217 C	Oil Reservoir Tank	Power House, Area 452	452-1005	Yes	A.A.C.R18-2-101.57.j
217 D	Hydraulic Oil Reservoir Tank	Power House, Area 452	452-1038	Yes	A.A.C.R18-2-101.57.j
217 E	Steam Driven turbine Engine	Power House, Area 451	451-1001	Yes	A.A.C.R18-2-101.57.j
217 F	Steam Driven Turbine Engine	Power House, Area 452	452-1001	Yes	A.A.C.R18-2-101.57.j
217 G	Electrical Generator Driven by Steam Turbine, no emission	Power House, Area 451	451-1003	Yes	A.A.C.R18-2-101.57.j
217 H	Electrical Generator Driven by Steam Turbine, no emissions	Power House, Area 452	452-1003	Yes	A.A.C.R18-2-101.57.j
217 I	Coal Silo #1 Coal Silo #2 Coal Silo #3 Coal Silo #4 Sealed units, no emission	Power House, Area 412	412-2000 412-2001 412-2002 412-2003	No	A.A.C. R18-2-716
217 J	Coal Pulverizer #1 Coal Pulverizer #2 Coal Pulverizer #3 Coal Pulverizer #4	Power House, Area 412	412-2040 412-2047 412-2054 412-2061	No	A.A.C. R18-2-716
217 K	Water Sprays	Power House, Area 412	412-1120	No	A.A.C. R18-2-716
218 SN-WWT1-S004	No. 1 Diesel Fire Pump Exhaust No. 2 Diesel Fire Pump Exhaust			No	A.A.C.R18-2-719
218 A	Elevated fire Tower Water Tank	Power House, Area 464	464-1001	Yes	A.A.C.R18-2-101.57.j
219 SN-WWT1-T001	No. 1 Mill Fresh Water Tank	Power House, Area 463	463-1001	Yes	A.A.C.R18-2-101.57.j
220 SN-WWT1-T002	No.2 Mill Fresh Water Tank	Power House, Area 463	463-1003	Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
221 SN-WWT1-T003	Phosphate Mix Tank	Power House, Area 463	463-1005	Yes	A.A.C.R18-2-101.57.j
222 SN-WWT2-M012	DAF Polymer Feed Tank	Waste Water Treatment, Area 482	482-2023	Yes	A.A.C.R18-2-101.57.j
223 SN-WWT2-M013	Belt Press Polymer Feed Tank	Waste Water Treatment, Area 482	482-2024	Yes	A.A.C.R18-2-101.57.j
223 A	DAF Cell I	Waste Water Treatment, Area 482	482-1300	No	A.A.C.R18-2-730
223 B	DAF I Retention Tank	Waste Water Treatment, Area 482	482-1321	No	A.A.C.R18-2-730
223 C	DAF I Sludge Transfer Tank	Waste Water Treatment, Area 482	482-1322	No	A.A.C.R18-2-730
223 D	DAF Cell II Tank	Waste Water Treatment, Area 482	482-1400	No	A.A.C.R18-2-730
223 E	DAF II Retention Tank	Waste Water Treatment, Area 482	482-1421	No	A.A.C.R18-2-730
223 F	DAF II Transfer Tank	Waste Water Treatment, Area 482	482-1422	No	A.A.C.R18-2-730
223 G	Sludge Collection Tank	Waste Water Treatment, Area 482	482-1521	No	A.A.C.R18-2-730
224 SN-WWT2-S021	No. 1 Sludge Press	Waste Water Treatment, Area 482	482-1600	No	A.A.C.R18-2-730
225 SN-WWT2-S021	No. 2 Sludge Press	Waste Water Treatment, Area 482	482-1700	No	A.A.C.R18-2-730
226 SN-WWT2-S022	No. 3 Sludge Press Vent	Waste Water Treatment, Area 482	482-1800	No	A.A.C.R18-2-730
226 A	Primary Catenary Screen Secondary Catenary Screen	Waste Water Treatment, Area 482	482-1151 482-1152	No	A.A.C.R18-2-730
227 SN-WWT2-T009	Sulfuric Acid Tank (2)	Waste Water Treatment, Area 482	482-1930	Yes	A.A.C.R18-2-101.57.j
228 SN-WWT2-T010	DAF Polymer Storage Tank	Waste Water Treatment, Area 482	482-2021	Yes	A.A.C.R18-2-101.57.j
229 SN-WWT2-T011	BP Polymer Storage Tank	Waste Water Treatment, Area 482	482-2022	Yes	A.A.C.R18-2-101.57.j
230 SN-WWT2-T014	Instrument Air Receiver	Waste Water Treatment, Area 482	482-2122	Yes	A.A.C.R18-2-101.57.j
230 A	Flocculation Tank	Waste Water Treatment, Area 482	482-1210	Yes	A.A.C.R18-2-101.57.j

S. No.	ACTIVITY	Category	Equipment #	Yes/No	Reason
231 SN-WWT2-V015	No. 1 Mill Sewer line Vent			No	A.A.C.R18-2-730
232 SN-WWT2-V016	No. 2 Mill Sewer Line Vent			No	A.A.C.R18-2-730
233 SN-WWT2-V017	No. 3 Mill Sewer Line Vent			No	A.A.C.R18-2-730

XII. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emissions Monitoring System
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
CPSI	Catalyst Paper (Snowflake) Inc.
ESP	Electrostatic Precipitator
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
MMBtu/hr	Million British Thermal Units per Hour
MSDS	Material Safety Data Sheets
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter with an Aerodynamic Diameter of less than 10 microns
PTE	Potential to Emit
QA/QC	Quality Assurance / Quality Control
SO ₂	Sulfur Dioxide
TPY	Tons per Year
VOC	Volatile Organic Compounds