



**Environmental Affairs
Bureau of Air Quality
Inspection/Investigation Report**

**Lancaster BEHS Office
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Lancaster, SC 29720
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Source (Project):	New-Indy Catawba LLC	Date/Time:	February 22, 2021 @ 0934
Source No:	2440-0005	Type:	Comprehensive
Mailing Address:	PO Box 7 Catawba SC 29704	Owner/Operator:	Dan Mallett
Source Address:	5300 Cureton Ferry Rd Catawba SC 29704-7700	Person Contacted:	Dan Mallett
County:	York	Source Telephone:	803-981-8236
		Code:	MA01V
		Inspector:	Dabney Alexis D

New-Indy Catawba, LLC is an integrated pulp and paper mill located in Catawba, SC. The facility operates under the Title V Operating Permit #2440-0005 that was issued on May 7, 2019, became effective on July 1, 2019, and expires on June 30, 2024. The facility was issued Construction Permit DF on July 23, 2019, the construction permit was revised on May 13, 2020, and start of operation was on February 1, 2021. Present during this inspection was Dan Mallett, Peter Buckman, and Bob Tourville of New-Indy Catawba and Stephen Whisonant, Alex Latta, and Allie Dabney of the Lancaster BEHS Office. Source information and results of this inspection are as follows:

Permitted Sources:

- Unit ID 01 – Woodyard Area
 - Equipment ID ‘1300’ (East and West Woodyard Long Wood Handling (2), West Woodyard Purchased Chip Handling, East Woodyard Purchased Chip Handling (Rail), East Woodyard Purchased Chip Handling (Truck) with Cyclone, East Woodyard Purchased Chip Handling (Rail) Chip Screen, East Woodyard Chip Screen with Cyclone, West Woodyard Chip Screen, East and West Woodyard Debarking Drums (2), East Woodyard Purchased Chip (Rail) Rechipper with Cyclone, East Woodyard Chipper with Cyclone, West Woodyard Chipper with Cyclone, East Woodyard Rechipper with Cyclone, West Woodyard Rechipper, TMP and Kraft Mill Chip Silos, Long Term Storage Pile, Outside Chip Storage (2), Hardwood Silos, Hardwood Silos Cyclone)
 - Equipment ID ‘1300’ (Truck Dump)
 - Equipment ID ‘1300’ (Rail Dump)

All of the equipment under Unit ID 01 was observed in place and operating at the time of the inspection with no visible emissions present. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

- Unit ID 02 – Kraft Process – Kraft Pulp Mill
 - Equipment ID '5210' (1,825 ADTUBP/day Continuous Digester System: Digester Chip Bin, Continuous Digester, Chip Feed System, Blow Tank, Steam Economizer and Reboiler) w/ Control Devices '5270', '2605', and '3705'
 - Equipment ID '5220' (Turpentine Recovery System: Gas Cooler, Condenser, Decanter) w/ Control Devices '5260', '5260C', '5270', '2605', and '3705'
 - Equipment ID '5230' (Pulp Washing System: Pressure Diffuser, Filtrate Tank, Brown Stock Liquor Surge Tank) w/ Control Device '5270', '2605', and '3705'
 - Equipment ID '5240' (Oxygen Delignification System: No. 1 O₂ Reactor, Blow Tube, No. 1 Post O₂ Washer, No.1 Post O₂ Filtrate Tank, No. 2 O₂ Reactor, Blow Tube, No. 2 Post O₂ Washer, No. 2 O₂ Post Filtrate Tank, Post O₂ Surge Tank, No. 1B O₂ Reactor) w/ Control Devices '5270', '2605', and '3705'
 - Equipment ID '5250' (Knotting and Screening System: HD Tank, Primary Knotters (2), Secondary Knotters (2), No. 1 Primary Screen, No. 2 Primary Screen, Secondary Screen, Tertiary Screen, Quaternary Screen, Cleaner, Shive Thickener, Screen Room Filtrate Tank, Screen Room Washer) w/ Control Devices '5270', '2605', and '3705'

All of the equipment under Unit ID 02 was observed in place and operating at the time of the inspection, except for IDs '5240', '5250', and the Pressure Diffuser under '5230', which were all retired on September 5, 2020. No visible emissions were present from the sources in operation at the time of the inspection. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

- Unit ID 03 – Kraft Process – Bleach Plant
 - Equipment ID '5300' (Four Stage D₀E_{OP}D₁D₂ Bleaching System: D₀ Tower and Washer; E_{OP} Reactor, Washer and Filtrate Tank; D₁ Tower, Washer, and Filtrate Tank; D₂ Tower, Washer and Filtrate Tank; Acid Sewer; Alkaline Sewer) w/ Control Device '5300C'

All of the equipment under Unit ID 03 was observed in place but not operating, as it was retired on September 5, 2020.

- Unit ID 04 – Kraft Process – Chlorine Dioxide Plant
 - Equipment ID '1790' (40 ton/day Chlorine Dioxide Generator: Generator/Crystallizer/Reboiler, Saltcake Slurry Tank, Hydroclone and Saltcake Filter, Generator Dump Tank, Indirect Cooling Tower, ClO₂ Adsorption Tower, Barometric Condenser, Seal Plot, ClO₂ Storage Tanks (212,000 gallons), Filtrate Separation System) w/ Control Devices '1790C' and '1790Ca'

All of the equipment under Unit ID 04 was observed in place but not operating at the time of the inspection, as it was retired on September 5, 2020.

- Unit ID 05 – TMP Process
 - Equipment ID '4400' (1,054.5 ADTOP/day TMP Line 1-6: Chip Conveyor, Chip Washing System: Chip Washer and Screens (3 sets), 3 Chip Storage Silos, Pin Chip Screen Cyclone, 2 Chip Surge Bins, Heat and Turpentine Recovery System: Flash Tanks, Surge Tanks, 3 Liquid Phase Separators, Condensers, 2,880-gallon Decanter)
 - Equipment ID '4400' (TMP Line 1-3: Primary, Secondary, and Tertiary Refiner System, Peroxide Towers, Neutralization Chests, Screening and Cleaning Systems, Rejects Refiner Systems, Press System, Decker System, Sodium Hydrosulfite Bleaching System)
 - Equipment ID '4400' (TMP Lines 4-6: Primary, Secondary, and Tertiary Refiner System, Screening and Cleaning Systems, Rejects Refiner Systems, Press System, Decker System, Sodium Hydrosulfite Bleaching System)
 - Equipment ID '4400' (375 ADTP/day Hydrogen Peroxide Bleaching System)

All of the equipment under Unit ID 05 was observed in place but not operating at the time of the inspection, as it was retired on May 11, 2020.

- Unit ID 06 – Paper Mill
 - Equipment ID '2000' (171,850 ADT Paper/Year No.1 Paper Machine: Cleaner System, Deculator System, Precondenser System, Vacuum Pump System, Screen System, Mix

Tub, Headbox System, Forming Wire, Vacuum Blower, Vacuum Trench, Save-All System, Presses, Separators, Press Pulper, Dryer Systems, Dryer Pulper Calendar, Dry End Pulper, Reel, Slurry Mix Tanks, Mix Tanks)

- Equipment ID '2005' (No. 1 Paper Machine Rereeler and Trim Pulper)
- Equipment ID '2010' (No. 1 Coater Dryer, 48 million Btu/hr fired on Natural Gas, Propane, or Kerosene: Coater System, Coating Dryer, Screen/Filters, Reel, and Coated Broke Pulper)
- Equipment ID '4600' (261,600 ADT Paper/Year No. 2 Paper Machine: Cleaner System, Deculator System, Precondenser, Vacuum Pump System, Screen System, Headbox System Forming Wire, Vacuum Blower, Vacuum Trench, Save-All Systems, Dryer Pulper, Calendar, Dry End Pulper, Reel, Slurry Mix Tanks, Mix Tanks)
- Equipment '4605' (No. 2 Paper Machine Rereeler and Trim Pulper)
- Equipment ID '4610' (No. 2 Coater Dryer, 64 million Btu/hr fired on Natural Gas, Propane or Kerosene: Coating System, Coating Dryer, Screens/Filters, Reel, and Coated Broke Pulper)
- Equipment ID '4100' (382,917 ADT Paper/Year No. 3 Lightweight Coated Paper Machine: Mixed Stock Chest, Die Mix Tank, Filters, Cleaner System, Deculator System, Precondenser, Mixing Silo, Vacuum Pump System, Vacuum Trench, Screen System, Headbox System, Mix Eliminator, Vacuum Blowers, Forming Wire, Press System, Press Pulper, Dry Systems, Economizer, Dry End Pulper, Two-Sided Rod Coater System, Coating Preparation System, Coating Mix Tank, Coating Supply Tank, Steam Dryer, Calendars, Calendar Pulper, Reel, Reel Pulper, Winder, Trim Pulper)
- Equipment ID '4110' (16 million Btu/hr Air Flotation Dryer equipped with Low NO_x burners, fired on Natural Gas, Propane, or Kerosene)
- Equipment ID '4120' (Infrared Dryer with total heat input of 22.6 million Btu/hr fired on Natural Gas, Propane, or Kerosene)
- Equipment ID '4130' (9.1 million Btu/hr Hot Oil Heating System, fired on Natural Gas, Propane, or Kerosene)
- Equipment ID '2100' (296,300 ADT Paper/Year Pulp Dryer: Screen System, Decker, Headbox System, Cylinder Mold, Hood Exhaust System, Vacuum System, Press System, Press Pulper, Dryers, Economizer, Dry End Pulper, Steam heater Booster Oven on dry end, Cutter, Stacker)

- Equipment ID '9900' (Three – 5.304 million Btu/r Air Makeup Units for No. 2 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (Six – 5.46 million Btu/hr Air Makeup Units for No. 2 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (Two – 6.253 million Btu/hr Air Makeup Units for No. 3 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (Two – 7.02 million Btu/hr Air Makeup Units for No. 2 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (7.28 million Btu/hr Air Makeup Unit for No. 2 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (Four – 8.45 million Btu/hr Air Makeup Units for No. 1 Paper Machine, natural gas or propane fired)
- Equipment ID '9900' (10.01 million Btu/hr Air Makeup Unit for No. 3 Paper Machine, natural gas or propane fired)
- Equipment ID '9700' (Four – Starch Silos, Slurry Mix Tanks, Starch Cookers, Flash Tank, Mix Tanks) w/ Control Device 'B-2000'
- Equipment ID '9701A' (1,400-gallon Slurry Tank)
- Equipment ID '9701B' (1,400-gallon Slurry Tank)
- Equipment ID '9702' (Starch Cooker)
- Equipment ID '9703' (Flash Tank)
- Equipment ID '9704' (2,900-gallon Paste Tank)

All of the equipment under Unit ID 06 was observed in place and operating at the time of the inspection, except for IDs '2000', '2005', '2010', '4600', '4605', '4610', '4110', '4120', '4130', '9900' (No. 2 and No. 1 Paper Machine), '9700', '9701A', '9701B', '9702', '9703', and '9704', which were retired at different times in 2012, 2017, and 2020. No visible emissions were present from the sources in operation at the time of the inspection. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

Unit ID 07 – Chemical Recovery

- Equipment ID '2505' (412,140-ton BLS/year No. 2 NDCE Recovery Furnace (315,000 lb/hr maximum steaming rate on black liquor only): Furnace, Black Liquor Tanks) w/ Control Device '2505C'

- Equipment ID '2510' (412,140-ton BLS/year No. 2 Smelt Dissolving Tank) w/ Control Device '2511C'
- Equipment ID '2515' (No. 2 Precipitator Mix Tank)
- Equipment ID '2520' (No. 2 Salt Cake Mix Tank) w/ Control Device '2505C'
- Equipment ID '5105' (744,600-ton BLS/year No. 3 NDCE Recovery Furnace (560,000 lb/hr maximum steaming rate on black liquor only): Furnace, Black Liquor Tanks, Black Flash Tanks, Condensate Flash Tanks, Soap Stand Pipe, Stand Pipe Level Control Tank) w/ Control Device '5105C'
- Equipment ID '5110' (744,600-ton BLS/year No. 3 Smelt Dissolving Tank) w/ Control Device '2511C'
- Equipment ID '5115' (No. 3 Precipitator Mix Tank)
- Equipment ID '5120' (No. 3 Salt Cake Mix Tank) w/ Control Device '5105C'
- Equipment ID '2723' (465-ton CaO/day No.2 Lime Kiln with low NO_x burners) w/ Control Device '2723C'
- Equipment ID '2700' (Green Liquor Blend Tank, 470,000-gallon White Liquor Storage Tank, 172,730 No. 1 Green Liquor Clarifier, 845,000-gallon No. 2 Green Liquor Clarifier, 845,000-gallon No. 3 Green Liquor Clarifier, (M27-37) No. 2 Swing Tank for storing either White or Green Liquors, Dregs Filter, Ejector, Green Liquor Storage, Three – 18,294-gallons, each, Green Liquor Storage Causticizers, White Liquor Pressure Filters, Mud Washer, Lime Mud Precoat Filters)
- Equipment ID '2700' (62,555-gallon No. 4 Causticizer) w/ Control Device '2725C'
- Equipment ID '2701' (465-ton CaO/day Slaker) w/ Control Device '2725C'
- Equipment ID '2702' (Purchased Lime Silo) w/ Control Device '2726C'
- Equipment ID '2703' (Reburned Lime Silo) w/ Control Device '2724C'
- Equipment ID '2400' (1,105.9-ton BLS/day No. 1 Multi-Effect Evaporator Set with concentrator) w/ Control Devices '5260', '5260C', '2605', and '3705'
- Equipment ID '2402' (Heavy Black Liquor Tank)
- Equipment ID '2500' (985.6-ton BLS/day No. 2 Multi-Effect Evaporator Set with concentrator) w/ Control Devices '5260', '5260C', '2605', and '3705'
- Equipment ID '5100' (1,077.5-ton BLS/day No. 3 Multi-Effect Evaporator Set with concentrator) w/ Control Devices '5260', '5260C', '2605', and '3705'

- Equipment ID '2722' (Lime Kiln Oxygen Enrichment system: Oxygen Lance (inside kiln), Oxygen Storage Tank, Two – Oxygen Mixers, and Piping)

All of the equipment under Unit ID 07 was observed in place and operating at the time of the inspection, except for ID '2722' which was retired in the early 2000s. No visible emissions were present from the sources in operation at the time of the inspection. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

- Unit ID 08 – Utilities

- Equipment ID '2550' (342-375 million Btu/hr Power Boiler, fired on natural gas, No.6 fuel oil; 225,000 lb.hr maximum steaming rate on any fuel)
- Equipment ID '2605' (392-405 million Btu/hr No. 1 Combination Boiler, fired on natural gas, No. 6 fuel oil, bark, TDF, Specification used oil, waste paper, paper cores: Boiler, TRS Gas Cooler, TRS Gas Condenser, TRS Mist Eliminator, TRS Gas Reheater) w/ Control Devices '2605C' and '2610C1'
- Equipment ID '3705' (420-720 million Btu/hr No. 2 Combination Boiler, fired on natural gas, No. 6 fuel oil, bark, TDF, Specification used oil, waste paper, paper cores: Boiler, TRS Gas Cooler, TRS Gas Condenser, TRS Mist Eliminator, TRS Gas Reheater) w/ Control Devices '3705C' and '3710C1'
- Equipment ID '5260' (LVHC Collection System) w/ Control Devices '5260C', '2605, and '3705'
- Equipment ID '5270' (HVLC Collection System) w/ Control Devices '2605' and '3705'
- Equipment ID '5261, 5271' (Flame Arrestors, Mist Eliminators, Condensate Collection Tanks for LVHC and HVLC)

All of the equipment under Unit ID 08 was observed in place and operating at the time of the inspection, except for ID '2550' which was retired on August 12, 2020. No visible emissions were present from the sources in operation at the time of the inspection. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

- Unit ID 09 – Waste Treatment

- Equipment ID '2901' (Mix Box)

- Equipment ID '2901' (Bar Screen)
- Equipment ID '2901' (Primary Clarifier)
- Equipment ID '2901' (Settling Pond)
- Equipment ID '2901' (Aerated Biotreatment)
- Equipment ID '2901' (Holding Basins)
- Equipment ID '2901' (Tertiary Treatment Plant)
- Equipment ID '9800' (180,000-gallon Foul Condensate Collection Tank (from NCG Systems) w/ Control Devices '2605' and '3705')
- Equipment ID '9801' (800 gallon/minute Condensate Steam Stripper) w/ Control Devices '2605' and '3705'
- Equipment ID '9820' (Stripper Off Gases (SOGs) Collection System) w/ Control Devices '2605' and '3705'

All of the equipment under Unit ID 09 was observed in place and operating at the time of the inspection, except for IDs '2901' which retired in 2017 and '9801' and '9820' which were retired September 5, 2020. No visible emissions were present from the sources in operation at the time of the inspection. Control device readings at the time of the inspection and operational ranges are listed in the specific permit conditions.

- Unit ID 10 – Storage Tanks
 - Equipment ID 'M10-223' (39,023-gallon Methanol Tank)

All of the equipment under Unit ID 10 was observed in place and operating at the time of the inspection with no visible emissions present.

- Unit ID 11 – Miscellaneous
 - Equipment ID '2900' (Landfill)
 - Equipment ID '1000' (Road Activities)
 - Equipment ID '1000' (Equipment Leaks and Cleaning Material Usage)
 - Equipment ID '1000' (Miscellaneous Material Usage)

All of the equipment under Unit ID 11 was observed in place and operating at the time of the inspection with no visible emissions present.

- Unit ID 12 – HD Pulp Storage Tanks
 - Equipment ID '1299' (Twelve – HD Pulp Storage Tanks) was observed in place and operating at the time of the inspection with no visible emissions present.

Control Devices:

- Control Device '2605' (B&W No. 1 Combination Boiler) was observed in place and operating at the time of the inspection.
- Control Device '3705' (B&W No. 2 Combination Boiler) was observed in place and operating at the time of the inspection.
- Control Device '5260' (LVHC Collection System) was observed in place and operating at the time of the inspection.
- Control Device '5260C' (LVHC System Caustic Scrubber) was observed in place and operating at the time of the inspection.
- Control Device '5270' (HVLC Collection System) was observed in place and operating at the time of the inspection.
- Control Device '5300C' (Bleaching System Scrubber) was observed in place but not operating at the time of the inspection.
- Control Device '1790C, 1790Ca' (Chlorine Dioxide Generator Scrubber, chilled water and white liquor and Chlorine Dioxide Generator Tail Gas Scrubber, weak wash, and white liquor) was observed in place but not operating at the time of the inspection.
- Control Device 'B-2000' (Two – Starch Silo Bag Houses) was observed in place but not operating at the time of the inspection.
- Control Device '2505C' (No. 2 Recovery Furnace ESP) was observed in place and operating at the time of the inspection.
- Control Device '2511C' (Smelt Tanks Venturi Caustic Scrubber (Weak Wash and Caustic)) was observed in place and operating at the time of the inspection.
- Control Device '5105C' (No. 3 Recovery Furnace ESP) was observed in place and operating at the time of the inspection.
- Control Device '2723C' (No. 2 Lime Kiln ESP) was observed in place and operating at the time of the inspection.
- Control Device '2725C' (Slaker Venturi Scrubber (Weak Wash and Caustic)) was observed in place and operating at the time of the inspection.

- Control Device '2726C' (Purchased Lime Silo Bag House) was observed in place and operating at the time of the inspection.
- Control Device '2724C' (Reburned Limo Silo Bag House) was observed in place and operating at the time of the inspection.
- Control Device '2605C' (No. 1 Combination Boiler Centrifugal Cyclone) was observed in place and operating at the time of the inspection.
- Control Device '2610C1' (No. 1 Combination Boiler ESP) was observed in place and operating at the time of the inspection.
- Control Device '3705C' (No. 2 Combination Boiler Centrifugal Cyclone) was observed in place and operating at the time of the inspection.
- Control Device '3710C1' (No. 2 Combination Boiler ESP) was observed in place and operating at the time of the inspection.
- Control Device '9820' (Stripper Off Gases (Collection)) was observed in place but not operating at the time of the inspection.
- Control Device '9801' (Condensate Steam Stripper) was observed in place but not operating at the time of the inspection.

No visible emissions were present from control devices in operation at the time of the inspection. The control device readings and operational ranges are listed in the specific permit conditions.

Exempt Sources:

- Equipment ID 'M38-0001' (Turbine Electric Generator (44 MW)) was observed in place at the time of the inspection.
- Equipment ID 'M26-5000' (Turbine Electric Generator (20 MW)) was observed in place at the time of the inspection.
- Equipment ID 'M10-77' (Elevated Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-111' (No. 1 Propane Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-112' (No. 2 Propane Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-116' (No. 2 Fuel Oil Storage Tank) was observed in place at the time of the inspection.

- Equipment ID 'M10-162' (4,000-gallon Hydraulic Oil Tank-South) was observed in place at the time of the inspection.
- Equipment ID 'M10-164' (4,000-gallon Hydraulic Oil Tank-North) was observed in place at the time of the inspection.
- Equipment ID 'M10-170' (No. 1 Fuel Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-173' (Bulk Oil Lubricating Van Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-283' (Fuel Oil Spill Tank at LWC shipping) was observed in place at the time of the inspection.
- Equipment ID 'M10-306' (No. 4 Lube Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-307' (No. 5 Lube Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-308' (No. 6 Lube Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-314' (3,000-gallon Diesel Fuel Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-315' (1,000-gallon Kerosene Fuel Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-338' (Waste Oil Storage Tank at Fuel Oil Tanks) was observed in place at the time of the inspection.
- Equipment ID 'M10-339' (Oil-Water Separator Feed Tank, Fuel Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-347' (Above Ground Lube Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-348' (Above Ground Lube Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M10-361' (Oil/Water Separator Feed Tank at Truck Unloading) was observed in place at the time of the inspection.
- Equipment ID 'Fire Pump' (Emergency Fire Pump #2 (175 hp)) was observed in place at the time of the inspection.

- Equipment ID 'M12-41' (Drinking Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-45' (Vacuum Priming Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-60' (Finished Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-96' (Poly Phosphate Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-97' (Poly Phosphate Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-113' (Sodium Sulfite Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-117' (Lime Solution Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-118' (Brine Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-119' (Sulfuric Acid Tank-15' Diameter (outside not vented)) was observed in place at the time of the inspection.
- Equipment ID 'M12-121' (Caustic Tank-16' Diameter) was observed in place at the time of the inspection.
- Equipment ID 'M12-122' (Demineralized Water Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-134' (Sulfuric Acid Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-135' (Caustic Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-136' (Caustic Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-216' (Concentrated Alum Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-218' (Dilute Alum Tank) was observed in place at the time of the inspection.
- Equipment ID 'M12-679' (West Woodyard Cooling Tower Water Tank) was observed in place at the time of the inspection.

- Equipment ID 'M12-707' (East Woodyard Cooling Tower Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M14-174' (Bulk Defoamer Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-5' (Warm Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-97' (Bulk Defoamer Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-479' (Instrument Air Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-9' (93% Sulfuric Acid Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-59' (Dilute Alum Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-60' (Alum Constant Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-100' (Concentrated Retention Aid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-108' (Color Tank North Row East) was observed in place at the time of the inspection.
- Equipment ID 'M19-109' (Color Tank North Row Center) was observed in place at the time of the inspection.
- Equipment ID 'M19-110' (Color Tank North Row West) was observed in place at the time of the inspection.
- Equipment ID 'M19-111' (Color Tank South Row East) was observed in place at the time of the inspection.
- Equipment ID 'M19-112' (Color Tank South Row West) was observed in place at the time of the inspection.
- Equipment ID 'M19-135' (Clay Additive Supply Tank) was observed in place at the time of the inspection.
- Equipment ID 'M19-136' (Clay Additive Mix Tank) was observed in place at the time of the inspection.

- Equipment ID 'M19-141' (Deculator Condensate Water Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-11' (Primary Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-28' (No. 1 Fresh Water Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-66' (Felt Wash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-157' (Concentrated Felt Wash Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-161' (No. 1 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-162' (No. 2 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-163' (No. 3 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-164' (No. 4 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-165' (No. 5 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-166' (No. 6 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-167' (No. 7 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-168' (No. 8 Steam Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-172' (Secondary Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-183' (Oil Tank A East) was observed in place at the time of the inspection.
- Equipment ID 'M20-184' (Oil Tank A West) was observed in place at the time of the inspection.
- Equipment ID 'M20-187' (Oil Sump Tank at Column 35) was observed in place at the time of the inspection.

- Equipment ID 'M20-188' (Oil Sump Tank at Column 41) was observed in place at the time of the inspection.
- Equipment ID 'M20-189' (Oil Sump Tank at Column 55) was observed in place at the time of the inspection.
- Equipment ID 'M20-191' (Acid Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-203' (Retention Aid Mixing Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-215' (Dilute Retention Aid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-237' (No. 2 Condensate Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-265' (Primary Collector Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-266' (Secondary Collector Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-334' (No. 2 Fresh Water Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-345' (PM Shower Condensate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M20-442' (Caustic Felt Wash Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M22-39' (Propane Vapor Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M22-155' (Pulp Cutter Blade Heater Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M23-114' (270-gallon Fuel Tank) was observed in place at the time of the inspection.
- Equipment ID 'M25-172' (No. 2 Cooling Water Collection Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-33' (No. 1 Cooling Water Collecting Tank) was observed in place at the time of the inspection.

- Equipment ID 'M26-51' (Condensate Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-52' (Demineralized Water Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-69' (Boiler Continuous B.D. Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-79' (Phosphated Feed Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-80' (Caustic Feed Tank (Neutralizing Amine)) was observed in place at the time of the inspection.
- Equipment ID 'M26-81' (Neutralizing Amine Feed Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-82' (Hydrazine Feed Tank) was observed in place at the time of the inspection.
- Equipment ID 'M26-5016' (Turbine Oil Reservoir) was observed in place at the time of the inspection.
- Equipment ID 'M26-5063' (No. 2 Control Air Compressor Receiver) was observed in place at the time of the inspection.
- Equipment ID 'M27-177' (25% Caustic Tank) was observed in place at the time of the inspection.
- Equipment ID 'M27-463' (No. 1 Setting Aid Retention Tank) was observed in place at the time of the inspection.
- Equipment ID 'M27-464' (No. 2 Setting Aid Retention Tank) was observed in place at the time of the inspection.
- Equipment ID 'Emergency Drive' (Emergency Lime Kiln Drive (101 hp)) was observed in place at the time of the inspection.
- Equipment ID 'M28-79' (Sulfuric Acid Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-93' (4% Caustic Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-136' (Liquid Nitrogen Storage Tank) was observed in place at the time of the inspection.

- Equipment ID 'M28-139' (Emergency Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-141' (Sulfuric Acid Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-146' (Sodium Chlorate Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-157' (Sodium Chlorate Unloading Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-215' (Sodium Chlorate Storage Tank C) was observed in place at the time of the inspection.
- Equipment ID 'M29-22' (Air Compressor Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-27' (No. 2 Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-28' (No. 3 Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-31' (Anionic Polymer Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-34' (Anionic Polymer Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-36' (No. 1 Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-36' (Acid Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-37' (Alum Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-39' (DAF Air Solution Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-40' (Coagulation Contact Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-42' (Flocculation Contact Tank) was observed in place at the time of the inspection.
- Equipment ID 'M29-44' (DAF Sludge Tank) was observed in place at the time of the inspection.

- Equipment ID 'M29-46' (DAF Clarifier Tank and Skimmer) was observed in place at the time of the inspection.
- Equipment ID 'M29-59' (Aeration Pond Defoamer Bulk Tank) was observed in place at the time of the inspection.
- Equipment ID 'Pumps' (Contractor Owned Pumps (5 pumps @ 50 hp each)) was observed in place at the time of the inspection.
- Equipment ID 'M30-338' (PM Drive Reducers Lube Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-2' (Type 1 Clay Storage Tank No. 2) was observed in place at the time of the inspection.
- Equipment ID 'M32-3' (Outside Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-31' (No. 3 Cowles Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-32' (No. 2 Cooked Starch Tanks) was observed in place at the time of the inspection.
- Equipment ID 'M32-34' (No. 1 Cooked Starch Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-42' (No. 2 Cowles Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-43' (No. 1 Cowles Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-55' (No. 1 PM Coater Supply Tank No.2) was observed in place at the time of the inspection.
- Equipment ID 'M32-56' (No. 1 PM Coater Supply Tank No.1) was observed in place at the time of the inspection.
- Equipment ID 'M32-64' (No. 1 PM Coater Service Tank No.1) was observed in place at the time of the inspection.
- Equipment ID 'M32-66' (No. 1 PM Coater Service Tank No.2) was observed in place at the time of the inspection.
- Equipment ID 'M32-72' (No. 1 Mix Tank) was observed in place at the time of the inspection.

- Equipment ID 'M32-80' (Outside Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-113' (Titanium Dioxide Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-118' (No. 1 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-119' (No. 2 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-149' (No. 2 Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-157' (No. 1 Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-175' (No. 1 Insolubilizer Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-188' (No. 1 Calcium Stearate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-189' (No. 2 Calcium Stearate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-194' (Ammonia Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-200' (No. 3 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-218' (Outside Alum Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-254' (No. 5 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-256' (No. 6 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-257' (No. 4 Latex Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-267' (No. 7 Calcined Clay Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-268' (No. 6 Calcined Clay Tank) was observed in place at the time of the inspection.

- Equipment ID 'M32-328' (No. 4 Delaminated Clay Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-330' (No. 4 Delaminated Clay Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-341' (No. 1 Starch Slurry Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-342' (No. 2 Starch Slurry Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-342' (No. 2 Starch Slurry Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-345' (No. 1 Starch Slurry Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M32-346' (No. 2 Starch Slurry Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M33-83' (Condensate Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M33-136' (Propane Gas Tank) was observed in place at the time of the inspection.
- Equipment ID 'M33-199' (Cooling Water Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M33-296' (Supply Fan Lube Oil System Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M33-299' (No. 2 Alum Constant Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-16' (Compression Tank-Old System) was observed in place at the time of the inspection.
- Equipment ID 'M36-17' (Refrigerant Receiver Old System) was observed in place at the time of the inspection.
- Equipment ID 'M36-22' (Well Drinking Water Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-56' (Hot Water System Expansion Tank) was observed in place at the time of the inspection.

- Equipment ID 'M36-59' (Fuel Oil Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-68' (Propane Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-68' (Propane Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-75' (Potable Hot Water Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-84' (Hot Water System Air Separator) was observed in place at the time of the inspection.
- Equipment ID 'M36-85' (Chilled Water System Expansion Tank) was observed in place at the time of the inspection.
- Equipment ID 'M36-85 (Chilled Water System Air Separator (2)) was observed in place at the time of the inspection.
- Equipment ID 'M37-21' (No. 2 Deaerating Feedwater Storage Tanks) was observed in place at the time of the inspection.
- Equipment ID 'M37-30' (Small Caustic Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M37-149' (Emergency Start-up Air Compressor Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M37-182' (Air Receiver Tank for No. 6 and 7 Air Compressor) was observed in place at the time of the inspection.
- Equipment ID 'M38-3' (Main Lube Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M39-106' (Chilled Water System Air Separator) was observed in place at the time of the inspection.
- Equipment ID 'M40-56' (Red Dye Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-80' (Concentrated Acid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-82' (5% Diluted Sulfuric Acid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-85' (Alum Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-89' (Blue Dye Tank) was observed in place at the time of the inspection.

- Equipment ID 'M40-91' (Red Dye Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-93' (Blue Dye Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-106' (Caustic and Kerosene Measuring Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-108' (Concentrated Solution Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-110' (Dilute Solution Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-116' (Alum Dilution Tank) was observed in place at the time of the inspection.
- Equipment 'M40-122' (Acid Measuring Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-161' (Caustic Felt Wash Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-173' (Bulk Defoamer Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-176' (Soap Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-177' (Soap Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-212' (Retention Aid Bulk Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-213' (Retention Aid Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-229' (1-1/2% Sulfuric Acid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-10' (Vacuum Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-237' (Oil Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-238' (2,000-gallon Oil Storage Tank) was observed in place at the time of the inspection.

- Equipment ID 'M41-239' (2,000-gallon Oil Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M40-245' (Rotary Drum Filter Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-246' (Rotary Drum Filter Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-251' (No. 1 Condensate Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-253' (No. 2 Condensate Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-257' (No. 4 Condensate Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-260' (Dryer Drainage Vacuum Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-265' (No. 5 Condensate Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-283' (Fresh Water Collecting Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-387' (Reclaimed Felt Wash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-400' (Vacuum Pit Water to Pulp Mill Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-405' (Oil Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-407' (Dry End Reducer Lube System Oil Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-441' (Oil Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-445' (Sump Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-450' (Condensate Collection Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-460' (High Pressure Pump Service Tank) was observed in place at the time of the inspection.

- Equipment ID 'M41-473' (Headbox Body Temperature Control Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-497' (Mill Air Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-540' (Acid Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-655' (Winder Lube Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-658' (Winder Oil Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-685' (Liebeck Pulper Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-784' (Instrument Air Emergency Reserve Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-905' (W.E. Lube Oil Sump Station No. 2 T.S.) was observed in place at the time of the inspection.
- Equipment ID 'M41-1001' (Caustic to Machine Rejects Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M41-1014' (pH Water Heat Exchanger Condensate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M43-676' (pH Water Heat Exchanger Condensate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-11' (Hydrogen Peroxide Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M44-194' (Borol Storage Tank 'A') was observed in place at the time of the inspection.
- Equipment ID 'M44-198' (Hydrosulfite Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-201' (Sulfur Dioxide Storage Tank 'A') was observed in place at the time of the inspection.
- Equipment ID 'M44-204' (Cooling Water Collection Tank) was observed in place at the time of the inspection.

- Equipment ID 'M44-273' (Sodium Silicate Storage Tank 'A') was observed in place at the time of the inspection.
- Equipment ID 'M44-274' (Sodium Aluminate Tank 'A') was observed in place at the time of the inspection.
- Equipment ID 'M44-275' (Sodium Aluminate Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M44-277' (Caustic Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-309' (Cooling Water Collection Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-374' (DTPA Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-385' (Stpp Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-392' (Zinc Sulfate Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-402' (Sodium Aluminate Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-404' (Borol Storage Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M44-406' (Alum Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-408' (Alum Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-411' (Sulfur Dioxide Storage Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M44-413' (Hydrogen Peroxide Tank 'C') was observed in place at the time of the inspection.
- Equipment ID 'M44-423' (Zinc Sulfate Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-447' (Sump Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-468' (Hot White Water Collection Tank) was observed in place at the time of the inspection.

- Equipment ID 'M44-469' (Sodium Silicate Storage Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M44-550' (Hot Fresh Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-725' (Phosphate Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M44-727' (Oxygen Scavenger Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-75' (Stock Prep. Alum Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-78' (5% Caustic Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-79' (Alum Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-81' (93% Sulfuric Acid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-87' (1.5% Sulfuric Acid Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-99' (Alum Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-100' (No. 1 East Dye Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-102' (No. 2 West Dye Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-104' (No. 1 Dye Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-106' (No. 2 Dye Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-110' (No. 3 Dye Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-117' (Soap Bulk Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-136' (Retention Aid Bulk Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-138' (Clay Mix Tank) was observed in place at the time of the inspection.

- Equipment ID 'M45-138' (Retention Aid Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-155' (Clay Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-200' (Deaerator Vessel Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-225' (Sulfuric Acid Inhibitor Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-566' (Calcined Clay Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M45-568' (Sodium Aluminate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-9' (Felt Cleaning Soap Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-10' (Felt Cleaning Kerosene Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-11' (Felt Cleaner Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-21' (Felt Cleaner Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-92' (Press Section Air Compressor Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-321' (Cooling Water Reclaim Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-507' (pH Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-510' (Retention Aid Use Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-614' (Chilled Water System No. 2 Expansion Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-521' (Separator Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M46-788' (Cooling Dryer Separator Seal Tank) was observed in place at the time of the inspection.

- Equipment ID 'M47-17' (No. 3 Flash Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-80' (No. 2 Coating Supply Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-154' (No. 1 Dye Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-156' (No. 2 Dye Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-158' (No. 1 Dye Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-160' (No. 2 Dye Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-300' (No. 3 Filter Clay Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-306' (Viscosity Modifier Tank) was observed in place at the time of the inspection.
- Equipment ID 'M47-308' (No. 2 Dye Holding Tank) was observed in place at the time of the inspection.
- Equipment ID 'M48-31' (No.1 Coating Service Tank) was observed in place at the time of the inspection.
- Equipment ID 'M48-129' (Cooling Water Reclaim Tank) was observed in place at the time of the inspection.
- Equipment ID 'M48-259' (No. 2 Coating Service Tank) was observed in place at the time of the inspection.
- Equipment ID 'M48-273' (Chilled Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M48-280' (Coated Broke Alum Head Tank) was observed in place at the time of the inspection.
- Equipment ID 'M49-37' (No. 3 S/C Temperature Control System Tank) was observed in place at the time of the inspection.
- Equipment ID 'M49-88' (No. 4 S/C Temperature Control System Tank) was observed in place at the time of the inspection.

- Equipment ID 'M50-140' (Digester Extraction Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M50-390' (Air Receiver Tank) was observed in place at the time of the inspection.
- Equipment ID 'M50-393' (LP Gas Tank) was observed in place at the time of the inspection.
- Equipment ID 'M50-628' (Trim Broke Pulper Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-29' (Condensate Receive Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-30' (Continuous Blowdown Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-31' (Intermittent Blowdown Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-202' (Defoamer Bulk Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-204' (Steam Condensate Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-255' (No. 3 Condensate Separator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M51-498' (Nalco 2,000-gallon Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-215' (Alum Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-285' (Stpp Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-309' (Cooling Water Collection Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-422' (V-Brite Storage Tank 'B') was observed in place at the time of the inspection.
- Equipment ID 'M61-426' (EDTA Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-429' (EDTA Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M61-430' (Zinc Sulfate Day Tank) was observed in place at the time of the inspection.

- Equipment ID 'M62-91' (Chilled Water Tank) was observed in place at the time of the inspection.
- Equipment ID 'M63-630' (Cal. Temp Air Sys. Water Expansion Tank) was observed in place at the time of the inspection.
- Equipment ID 'M14-30' (White Liquor Measuring Tank) was observed in place at the time of the inspection.
- Equipment ID 'M14-31' (Black Liquor Measuring Tank) was observed in place at the time of the inspection.
- Equipment ID 'M14-46' (Hot Water Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M14-93' (Blow Heat Accumulator Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-01' (Blow Tank No. 1-South) was observed in place at the time of the inspection.
- Equipment ID 'M15-118' (M-C Pump to No. 3 Br. H.D. Standpipe) was observed in place at the time of the inspection.
- Equipment ID 'M15-125' (Blow Tank No. 2 North) was observed in place at the time of the inspection.
- Equipment ID 'M15-174' (No. 4 Black Liquor Filtrate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-36' (No. 1 Black Liquor Filtrate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-40' (No. 2 Black Liquor Filtrate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-42' (No. 3 Black Liquor Filtrate Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-44' (Collecting Tank for No.4 PSG Shower) was observed in place at the time of the inspection.
- Equipment ID 'M15-64' (Brown Stock Mixing Tank) was observed in place at the time of the inspection.
- Equipment ID 'M15-67' (Soap Catch Tank) was observed in place at the time of the inspection.

- Equipment ID 'M16-112' (No. 4 Decker Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-120' (Defoamer Bulk Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-121' (Defoamer Day Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-133' (Woodyard White Water Surge Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-152' (No. 5 Decker Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-27' (Chlorine Stage Deaeration Tank) was observed in place at the time of the inspection.
- Equipment ID 'M16-37' (Secondary Head Box) was observed in place at the time of the inspection.
- Equipment ID 'M17-212' (No. 1 CLO 2 Tower) was observed in place at the time of the inspection.
- Equipment ID 'M17-2152' (No. 1 Chlorine Dioxide Tower) was observed in place at the time of the inspection.
- Equipment ID 'M17-22' (First Hypo Bleach Tower) was observed in place at the time of the inspection.
- Equipment ID 'M17-223' (Fifth Washer Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-377' (10% Caustic Storage Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-390' (No. 2 Washer Filtrate Deaeration Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-425' (Fifth Stage M-C Pump Standpipe) was observed in place at the time of the inspection.
- Equipment ID 'M17-430' (Chlorination Tower) was observed in place at the time of the inspection.
- Equipment ID 'M17-439' (Oxygen Storage Tank) was observed in place at the time of the inspection.

- Equipment ID 'M17-50' (Chlorine Washer Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-52' (Caustic Washer Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-55' (First HYPO Washer Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-61' (Bleach Plant Sewer Foam Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-79' (20% Caustic Tank) was observed in place at the time of the inspection.
- Equipment ID 'M17-96' (Fourth Washer Seal Tank) was observed in place at the time of the inspection.
- Equipment ID 'M25-12' (No. 1 Recovery Dissolving Tank) was observed in place at the time of the inspection.
- Equipment ID 'M25-30' (No.1 Recovery Salt Cake Mix Tank) was observed in place at the time of the inspection.
- Equipment ID 'M25-80' (No.1 Recovery Slurry Tank) was observed in place at the time of the inspection.
- Equipment ID 'M27-56' (Lime Mud Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-20' (No. 2 Bleach Liquor Tank) was observed in place at the time of the inspection.
- Equipment ID 'M28-34' (Chloride Head Tank) was observed in place at the time of the inspection.

No visible emissions were present from the exempt sources in operation at the time of the inspection.

Permit Conditions:

The following Monitoring and Reporting conditions were verified:

- C.1 – This condition is informational in nature and the facility is aware of the requirements.
- C.2 – The facility had a copy of their Department issued permit on-site and is maintaining records as required. At the time of the inspection, records were reviewed from the date of the previous inspection, August 26, 2019, to February 22, 2021, and found to be in order unless otherwise noted in the inspection.

- C.3 – The facility is maintaining all continuous monitoring systems and gauges in accordance with manufacturer’s specifications. The facility is maintaining all measurements and maintenance, including corrective actions taken, on file. The most recent inspection was conducted on February 22, 2021. The most recent calibration was conducted on February 21, 2021. See NESHAP portion of the inspection for calibrations required by the specific NESHAP Subparts.
- C.4 – All gauges were readily accessible and easily read. The facility is maintaining and recording parameter readings and maintenance checks. Deviations are noted with date, time, cause, and corrective actions taken. The most recent inspection was conducted on February 22, 2021. The most recent calibration was conducted on February 21, 2021. The most recent maintenance was conducted on January 19, 2021. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.5 – C.8 – These conditions are informational in nature and the facility is aware of the requirements.
- C.9 – The facility has not replaced a burner assembly. The facility has developed a tune-up plan and is maintaining the plan on-site as required. See specific conditions for the date the tune-ups were performed.
- C.10 – The facility is conducting source tests as required. The facility is maintaining a copy of the most recent source test summary letter from BAQ Source Evaluation on-site which was available for review at the time of the inspection. See table below for the most recent source tests:

Test Date	Description
April 29, 2020	No 2 Lime Kiln, 3 Recovery Boiler, and No 1 and No 3 Smelt Dissolving Tank Vent.
February 20, 2020	Combination Boiler 1 and 2: 40CFR63 DDDDD Boiler MACT Testing.
March 27, 2019	No 2 and No 3 Smelt Dissolving Tank Vent TRS Testing.
March 27, 2019	No 2 Lime Kiln and No 3 Recovery Boiler NOx testing.
March 22, 2018	Swing Boiler, No 2 Lime Kiln, No 2 Recovery Boiler and No 3 Recovery Boiler PM Testing.
March 22, 2018	Swing Boiler (PM), No 2 Lime Kiln (PM/NOx), No 2 Recovery Boiler (PM/TRS) and No 3 Recovery Boiler (PM/SO2/NOx).
February 28, 2018	15-Day Condensate Collection and Treatment Test on Steam Stripper (CDID9801). 40CFR63 Subpart S.
April 27, 2017	No 2 & 3 Smelt Dissolving Tank Vents PM Testing.
April 27, 2017	Bleach Plant Scrubber HAP Testing

March 9, 2017	Combination Boilers 1 & 2 (ID 02) 40CFR63 Subpart DDDDD PM, HCl, CO, & Hg testing.
September 20, 2016	Bleach Plant Scrubber Chlorinated HAP Test.
March 18, 2016	Testing of Swing Boiler, No. 2 Lime Kiln, Recovery Boiler 2, and Recovery Boiler 3 & 40CFR63 Subpart MM
February 10, 2016	15-Day Condensate Collection and Treatment Test on Steam Stripper (CD ID 9801) - HAP - 40CFR63 Subpart S
February 4, 2016	Boiler MACT (40CFR63 Subpart DDDDD) testing on CB1 and CB2.

Test Date	Description - RATA/Other
November 3, 2020	Combination Boiler 1 & 2, Recovery Boiler 2 & 3 and Lime Kiln 4th Qtr. COMS
October 1, 2020	Recovery Boiler 2 & 3, Lime Kiln, Combustion Boiler 1 & 2; 3rd Quarter COMS
April 29, 2020	No 3 Recovery Boiler NOx and O2 RATA
March 27, 2019	No 3 Recovery Boiler CEMS NOx RATA.
November 14, 2018	CGA and 7 day Calibration Drift test on No 3 Recovery Boiler TRS Monitor.
March 21, 2018	No 3 Recovery Furnace (RB3) NOx and O2 CEMS RATA.
April 27, 2017	No 3 Recovery Boiler NOx and O2 CEMS RATA.
April 26, 2017	Swing Boiler NOx Emissions Factor Testing.
November 14, 2016	No. 3 Recovery Boiler TRS CEMS CGA & 7 Day Drift Test.

- C.11 – The facility is conducting all non-enclosed operations in a manner that minimizes airborne particulate matter to the maximum extent possible through proper housekeeping. The opacity limit for ID ‘1300’ is 20%. The facility did not exhibit an opacity or fugitive emissions during the inspection. The facility is conducting and recording semiannual visual emissions inspections, as well as any corrective actions taken. The most recent semiannual visual emissions inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.12 – The opacity limit for IDs ‘5210’, ‘5250’, ‘2605’, ‘3705’, and ‘5270’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.13 – The facility is subject to 40 CFR 64, Compliance Assurance Monitoring (CAM). To meet the requirements of 40 CFR 64 for the affected sources, the indicator for TRS reduction will be the status of TRS venting or losses from the collection system of affected TRS sources required to be routed to boilers. To meet the requirements of 40 CFR 64 for the affected sources, the indicator for TRS reduction will be the status of TRS venting or losses from the collection system of affected TRS sources required to be routed to boilers. The status of affected TRS streams shall be used to provide reasonable assurance of continuing compliance

with 40 CFR 60 Subpart BB TRS reduction requirements. The facility is keeping records of all venting, bypasses, and/or TRS losses that are exhausted to the atmosphere without being combusted in the boilers, as required. The most recent HVLC venting episode occurred on January 18, 2021. The most recent LVHC venting episode occurred on February 2, 2021. The facility is conducting monthly checks of the flame failure system and maintaining records as required. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on February 22, 2021 and started back up the same day.

The facility is submitting semiannual reports to the Department and noting date, time, cause, and corrective actions. The most recent report was received by BAQ Technical Management Section on January 27, 2021

- C.14 – The facility is recording daily unbleached pulp production and calculating the monthly average daily unbleached pulp production, as well as a 12-month rolling average. On February 21, 2021, the daily unbleached pulp production was 1,099.96 tons. For January 2021, the monthly average daily unbleached pulp production was 680 tons, with a 12-month rolling average of 19,713 tons/month. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.15 – The opacity limit for IDs ‘5300’ and ‘5300C’ is 20%. The facility did not exhibit an opacity during the inspection. The facility is recording liquid recirculation flow, scrubber pH, and fan operation once every 15 minutes with an averaging time of 3 hours. On the last day of operation for IDs ‘5300’ and ‘5300C’, September 6, 2020, at 12:00 AM, the liquid flow was 160.1 gpm with a 3-hour average of 160 gpm and a range of > 87 gpm. The scrubber pH was 13.6 with a 3-hour average of 13.64 and a range of > 10.4. The fan operation was “On,” with a 3-hour average of “On” and a range of =” On”. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.16 – The opacity limit for IDs ‘1790’, ‘1790C’, and ‘1790Ca’ is 20%. The facility did not exhibit an opacity during the inspection. The facility is recording pressure drop, liquid flow, and liquid pH at least once daily. On the last day of operation for IDs ‘1790’, ‘1790C’, and ‘1790Ca’, September 5, 2020, the pressure drop reading was 3.2” W.C. with a range of ≤ 18” W.C. The liquid flow was 100 gpm with a range of ≥ 50 gpm. The liquid pH was 11.7 with a range of ≥ 10.

The facility is submitting semiannual reports to the Department. The most recent report was received by the BAQ Technical Management Section on January 27, 2021.

- C.17 – The facility submitted a subsequent revision/correction/update of the RMP, along with a certification statement, to the Department on November 9, 2020.
- C.18 – The opacity limit for ID ‘4400’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.19 – The facility is limiting yearly production to 384,900 air dried tons of thermo-mechanical pulp (ADTP). The facility is recording actual total air dried tons on a monthly basis, as well as calculating a 12-month rolling sum. For May 2020, the monthly total of ADTP was 1,967 tons with a 12-month rolling sum of 75,333 ADTP/year. ID ‘4400’ was retired in May 2020 and is no longer producing ADTP. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.20 – The opacity limit for IDs ‘4600’, ‘4605’, ‘4610’, ‘4100’, ‘4110’, ‘2100’, ‘9701A’, ‘9701B’, ‘9702’, ‘9703’, and ‘9704’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.21 – The opacity limit for IDs ‘2000’, ‘2005’, and ‘2010’ is 40%. The facility did not exhibit an opacity during the inspection.
- C.22 – This condition is informational in nature and the facility is aware of the requirements.
- C.23 –The facility is performing and recording semiannual visual inspections, as well as any corrective actions taken. The most recent semiannual visual inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.24 – C.25 – The facility representative indicated that ID ‘2010’ has not operated since 2012.
- C.26 – The facility representative indicated that ID ‘4610’ has not operated since 2017.
- C.27 – The opacity limit for IDs ‘9700’ and ‘B-2000’ is 20%. The facility did not exhibit an opacity during the inspection. The facility is conducting and recording daily visual inspections while unloading, as well as any corrective actions taken. The most recent daily visual inspection was conducted on May 10, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.28 - The affected source, Starch Silos (4), is subject to 40 CFR 64, Compliance Assurance Monitoring (CAM) and shall comply with all applicable provisions. To meet the requirements of 40 CFR 64, for the baghouses (B-2000) and for the starch silos (B-2000), the indicator for PM

will be visual inspections (VE), which will be used to provide reasonable assurance of compliance with South Carolina Standard 4 requirements. The facility is conducting and recording daily visual inspections while unloading, as well as any corrective actions taken. The most recent daily visual inspection was conducted on May 10, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received on January 27, 2021.

- C.29 – The opacity limit for IDs ‘4120’ and ‘4130’ is 20%. The facility did not exhibit an opacity during the inspection. The facility is maintaining a log of startups, shutdowns, and malfunctions. The ID ‘4120’ was last shut down in 2013. ID ‘4130’ was last started up on April 2, 2020 and shut down for retirement on May 11, 2020. The facility was burning natural gas in IDs ‘4120’ and ‘4130’ and were not required to perform a visual inspection. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.30 – For IDs ‘4120’ and ‘4130’, the facility is burning natural gas as primary fuel, with propane and kerosene as backup fuels. The facility is recording monthly fuel usage, as well as calculating 12-month rolling sums. ID ‘4120’ has not operated since 2013. For ID ‘4130’, fuel usage in May 2020 was 989 mmBtu of natural gas, 0 gal propane, and 0 gal of kerosene were used. The 12-month rolling sums were 34,972 mmBtu of natural gas, 0 gal of propane, and 0 gal of kerosene. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.31 – The opacity limit for IDs ‘9900’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.32 – The facility is recording fuel consumption and calculating 12-month rolling sums. For January 2021, the 12-month rolling sum for natural gas consumption was 67 scf and the 12-month rolling sum for propane consumption was 0 gallons. The facility representative noted that IDs ‘9900’ have been powered by steam since May 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.33 – The facility representative indicated that ID ‘4110’ has been powered by steam since May 2020. The facility is recording fuel usage on a monthly basis, as well as calculating annual fuel usage. For May 2020, the facility used 1,744 mmBtu of natural gas and 0 gallons of propane and kerosene. For 2020, the annual usage of natural gas was 27,585 scf, with no

kerosene or propane being used. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.34 – The facility representative confirmed that ID '4110' utilizes low NO_x burners.
- C.35 – The facility representative indicated that ID '4610' has not operated since 2017. The facility is only burning natural gas and propane in IDs '9900'. The facility is recording fuel consumption on a 12-month rolling sum. For January 2021, the 12-month rolling sums for fuel consumption were 67 scf of natural gas and 0 gallons of propane. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.36 – The opacity limit for IDs '2400', '2402', and '5100' is 20%. The opacity limit for ID '2500' is 40%. The facility did not exhibit an opacity during the inspection.
- C.37 – The opacity limit for IDs '2515', '2520', '5115', and '5120' is 40%. The opacity limit for IDs '2700', '2702', and '2703' is 20%. The facility did not exhibit an opacity during the inspection. The most recent visual inspection was performed on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.38 – The opacity limit for IDs '2700' and '2701' is 20%. The facility did not exhibit an opacity during the inspection. The facility is recording liquid flow once per shift, as well as any corrective actions taken. On February 22, 2021, the liquid flow was 63 gpm with a range of ≥ 10 gpm.
- C.39 – The opacity limit for ID '2505' is 40%. The opacity limit for ID '2723' is 20%. The facility did not exhibit an opacity during the inspection. The facility is recording opacity readings continuously and calculating 6-minute block averages, as well as recording any corrective actions taken. On February 22, 2021, at 11:35 AM, the opacity reading for ID '2723C' was 2.13% with a 6-minute average of 2% and a range of $\leq 20\%$. On February 22, 2021, at 11:02 AM, the opacity reading for ID '2505C' was 17.9% with a 6-minute average of 9.2% and a range of $\leq 20\%$. The COMS calibration is listed below (February 21, 2021):

Equipment ID '2505C'			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 \pm 0.4	yes
Span	32.64	35.00 \pm 4.0	yes

Equipment ID '2723C'			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 ± 0.4	yes
Span	37.63	38.00 ± 2.0	yes

The facility is submitting semiannual reports to the Department and noting excess emissions and monitor downtime. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.40 – The opacity limit for IDs '2510' and '5110' is 20%. The facility did not exhibit an opacity during the inspection. The facility is recording scrubber pressure drop and liquid flow every 15-minutes with an averaging time of 3-hours, as well as recording any corrective actions taken. On February 22, 2021, at 11:30 AM, the pressure drop was 4.3" W.C. with a 3-hour average of 4.22" W.C. and a range of ≥ 1.5 " W.C. The liquid flow was 81 gpm with a 3-hour average of 81.31 gpm and a range of ≥ 65 gpm. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.41 – The opacity limit for ID '5105' is 35%. The facility did not exhibit an opacity during the inspection. The facility is recording opacity readings continuously and calculating 6-minute block averages, as well as recording any corrective actions taken. The facility is maintaining a log of startups, shutdowns, and malfunctions as required. ID '5105' was most recently shutdown and started back up on January 26, 2021. The COMs was most recently calibrated on February 21, 2021. See Condition C.42 for readings at the time of the inspection. The facility is submitting semiannual reports to the Department and noting excess emissions and monitor downtime. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.42 – The facility is conducting PM source tests every two years. The most recent PM source test was conducted on April 29, 2020. This unit is subject to 40 CFR 64, CAM, the facility shall utilize a continuous opacity monitor for PM monitoring requirements for NESHAP Subparts A and MM, which is considered by the Department as presumptively acceptable monitoring pursuant to §64.2(b)(1)(i) or (vi) for showing reasonable assurance of continuing compliance with the limitations of NSPS 40 CFR Subpart BB, South Carolina Standard 7 PSD BACT. The PSD BACT limit is more stringent than the MACT MM limit, the excursion level for opacity assures reasonable assurance of compliance with the more stringent South Carolina PSD BACT limitations. The facility is recording opacity readings continuously and calculating 6-

minute block averages, as well as recording any corrective actions taken. On February 22, 2021, at 11:03 AM, the opacity reading for ID '5105C' was 15.63% with a 6-minute average of 15.87% and a range of $\leq 20\%$. The COMS calibration is listed below for February 21, 2021:

Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 ± 0.4	yes
Span	34.94	35.10 ± 3.5	yes

The facility is recording PM and PM₁₀ monthly emissions, as well as calculating 12-month rolling averages. For January 2021, the monthly PM emissions were 10 tons with a 12-month rolling average of 9 tons. The monthly PM₁₀ emissions were 7 tons, with a 12-month rolling average of 6.1 tons. An algorithm was available on-site at the time of the inspection.

- C.43 – The facility is conducting PM source tests every 4 years. The most recent PM source test was conducted on April 29, 2020. This source is subject to 40 CFR 64, CAM and shall comply with all applicable provisions. The facility will utilize the continuous parametric monitoring system (CPMS) for scrubber operating parameters used for monitoring requirements of 40 CFR 63 Subpart MM, which is considered by the Department as presumptively acceptable monitoring pursuant to §64.2(b)(1)(i) or (vi) for showing reasonable assurance of continuing compliance with the limitations of SC Std. 7 and 40 CFR 60 Subpart BB. The facility is recording scrubber pressure drop and liquid flow every 15-minutes with an averaging time of 3-hours, as well as recording any corrective actions taken. On February 22, 2021, at 11:30 AM, the pressure drop was 4.3" W.C. with a 3-hour average of 4.22" W.C. and a range of ≥ 1.5 " W.C. The liquid flow was 81 gpm with a 3-hour average of 81.31 gpm and a range of ≥ 65 gpm.
- C.44 – The facility is conducting PM source tests every two years. The most recent PM source test was conducted on April 29, 2020. This source is subject to 40 CFR 64, CAM and shall comply with all applicable provisions. The facility shall utilize presumptively acceptable monitoring pursuant to §64.2(b)(1)(i) or (vi) [COMS] per the monitoring requirements of NESHAP 40 CFR 63, Subparts A and MM to meet CAM requirements for 40 CFR 60 Subpart BB, SC SM, and SC Std. 7. The facility is recording opacity readings continuously and calculating 6-minute block averages, as well as recording any corrective action taken on February 22, 2021, at 11:35 AM, the opacity reading for ID '2723C' was 2.13% with a 6-minute average of 2% and a range of $\leq 20\%$. The COMS calibration is listed below for February 21, 2021:

Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 ± 0.4	yes
Span	37.63	38.00 ± 2.0	yes

The facility is recording monthly production rate records and calculating the average ton per day lime production 12-month rolling average. For January 2021, the 12-month rolling average for ton per day lime production was 228 tons. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.45 – This unit is subject to 40 CFR 64, CAM and shall comply with all applicable provisions. The facility shall continue to operate and maintain liquid flow indicators on “2725C” to show reasonable assurance of compliance with SC Std. 4. The facility is recording liquid flow once per shift, as well as any corrective actions taken. On February 22, 2021, the liquid flow was 63 gpm with a range of ≥ 10 gpm. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.46 – This unit is subject to 40 CFR 64, CAM and shall comply with all applicable provisions. To meet the requirements of CAM the baghouses for the Lime Silos, the indicator for PM will be visual inspection, which will be used to provide reasonable assurance of continuing compliance with SC Std. 4. The facility is conducting and recording visual inspections at least once per day while unloading lime, as well as recording any corrective actions taken. The most recent visual inspection was conducted on February 22, 2021. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.47 – The facility is conducting SO₂ source tests every four years. The most recent SO₂ source test was conducted on March 22, 2018. The facility is only burning No. 6 fuel oil, black liquor solids, and natural gas in ID ‘5105’. The facility is recording monthly fuel usage, as well as calculating a 12-month rolling average for SO₂ emissions. For January 2021, 34,421 tons of black liquor solids, 402,476 gallons of No. 6 fuel oil, and 70,702,016 scf of natural gas were used. For January 2021, the 12-month rolling average for SO₂ emissions was 16 tons. An algorithm was available on-site at the time of the inspection.
- C.48 - The facility is conducting SO₂ source tests every four years. The most recent SO₂ source test was conducted on March 22, 2018. The facility is only burning No. 6 fuel oil and natural gas in ID ‘2723’. The facility is recording monthly fuel usage, as well as calculating

annual usage for each fuel. For January 2021, 0 gal of No. 6 fuel oil and 32,620,536 scf of natural gas was used. The 2020 annual usage for No. 6 fuel oil was 0 gallons. The 2020 annual usage for natural gas was 555,303,712 scf. The facility is calculating a 12-month rolling sum for SO₂ emissions on a monthly basis. For January 2021, the 12-month rolling sum for SO₂ emissions was 1.06 tpy. An algorithm was available on-site at the time of the inspection. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management on January 27, 2021.

- C.49 – The facility is conducting CO source tests every four years. The most recent source test was conducted on February 8, 2021. The facility is only burning No. 6 fuel oil, black liquor solids, and natural gas in ID '5105'. The facility is recording monthly fuel usage, as well as calculating annual usage for each fuel. For January 2021, 34,421 tons of black liquor solids, 402,476 gallons of No. 6 fuel oil, and 70,702,016 scf of natural gas were used. For 2020, the annual usage for each fuel was 331,851 tons of black liquor solids, 1,145,936 gal of No. 6 fuel oil, and 347,795,178 scf of natural gas. The facility is calculating a 12-month rolling average for CO emissions on a monthly basis. For January 2021, the 12-month rolling average for CO emissions was 199 tons. An algorithm was available on-site at the time of the inspection.
- C.50 - The facility is conducting CO source tests every four years. The most recent source test was conducted on February 8, 2021. The facility is only burning No. 6 fuel oil and natural gas in ID '2723'. The facility is recording monthly fuel usage, as well as calculating annual usage for each fuel. For January 2021, 0 gal of No. 6 fuel oil and 32,620,536 scf of natural gas was used. The 2020 annual usage for No. 6 fuel oil was 0 gallons. The 2020 annual usage for natural gas was 555,303,712 scf. The facility is calculating a 12-month rolling sum for CO emissions on a monthly basis. For January 2021, the 12-month rolling sum for CO emissions was 6.08 tpy. An algorithm was available on-site at the time of the inspection. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.51 - The facility is conducting NO_x source tests every four years. The most recent NO_x source test was conducted on March 31, 2019. The facility is continuing to operate a NO_x CEMS. The CEMS calibration is listed below for February 21, 2021:

Type	Adjusted Reading	Percent Drift	Calibration Acceptable
Zero	0.21	0.15	yes
Span	123.62	1.09	yes

The facility certifies the monitoring system annually. The most recent annual certification was conducted on February 9, 2021. The facility is recording NO_x values at least once every 15 minutes, as well as calculating 24-hour averages and 10-day rolling averages. On February 22, 2021, the NO_x value was 54.3 ppm with a 24-hour average of 57.1 ppm and a 10-day rolling average of 57 ppm. The facility is calculating 12-month rolling averages for NO_x emissions on a monthly basis. For January 2021, the 12-month rolling average for NO_x emissions was 22 tons. An algorithm was available on-site at the time of the inspection. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021

- C.52 - The facility is conducting NO_x source tests every two years. The most recent NO_x source test was conducted on March 31, 2019. The facility is recording monthly production rates, as well as calculating 12-month rolling sums. For January 2021, the monthly production rate was 4,111 tons, with a 12-month rolling sum of 228 tpy. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.53– The affected sources (2400, 2500, 5100, 5260, 5260C, 2605, 3705) sources are subject to 40 CFR 64, CAM and shall comply with all applicable provisions. To meet the requirements of 40 CFR 64 for the affected sources, the indicator for TRS reduction will be the status of TRS venting or losses from the collection system of affected TRS sources required to be routed to boilers. The owner or operator will keep records of all venting, bypasses, and/or TRS losses that are exhausted to the atmosphere without being combusted in the boilers. The venting time period and source of the venting event shall be determined and recorded. As approved by the Department, the owner or operator shall continue to operate, and maintain a flame failure system for these boilers provide positive indication of vents when there is an absence of a flame in a boiler. The status of affected TRS streams shall be used to provide reasonable assurance of continuing compliance with *SC Std. 4* and *NSPS BB* TRS reduction requirements. The facility is recording scrubber liquid flow and scrubber liquid pH at least once daily, as well as any corrective actions taken. On February 22, 2021, the scrubber liquid flow was 40 gpm with a range of ≥ 30 gpm. The scrubber liquid pH was 11.0 with a range of ≥ 10 . The facility is keeping records of all venting, bypasses, and/or TRS losses that are exhausted to the atmosphere without being combusted in the boilers, as required. The most recent HVLC

venting episode occurred on January 18, 2021. The most recent LVHC venting episode occurred on February 2, 2021. The facility is conducting monthly checks of the flame failure system and maintaining records as required. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on February 22, 2021 and started back up on the same day. The facility is submitting semiannual reports. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.54 – The facility is continuing to operate and maintain a CEMS for ID '2505'. The CEMS calibration is listed below for February 21, 2021:

Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 ± 0.4	yes
Span	32.64	35.00± 4.0	yes

The facility is calculating and recording 12-hour average TRS concentrations and O₂ daily, as well as any corrective actions taken. On February 22, 2021, the TRS 12-hour average was 2.89 ppmv @ 8% O₂ with a range of ≤ 20 ppmv @ 8% O₂. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management on January 27, 2021.

- C.55 – The facility is continuing to operate and maintain a CEMS for ID '5105'. The CEMS calibration is listed below for February 21, 2021:

Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 ± 0.4	yes
Span	34.94	35.10 ± 3.5	yes

The facility is calculating and recording 12-hour average TRS concentrations and O₂ daily, as well as any corrective actions taken. On February 22, 2021, the TRS 12-hour average was 1.81 ppmv @ 6.7% O₂ with a range of ≤ 5 ppmv @ 8% O₂. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on January 26, 2021 and started back up on the same day. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.56 – The facility is only burning black liquor solids, No. 6 fuel oil, and natural gas in ID '5105'. The facility is recording monthly fuel usage, as well as calculating annual usage for each fuel. For January 2021, 34,421 tons of black liquor solids, 402,476 gallons of No. 6 fuel oil, and 70,702,016 scf of natural gas were used. According to facility records presented during the

inspection, the 2020 annual usage for each fuel was 331,851 tons of black liquor solids, 1,145,936 gal of No. 6 fuel oil, and 347,795,178 scf of natural gas. The facility is calculating the 12-month rolling annual capacity factor individually for No. 6 fuel oil and natural gas. The annual capacity factor should be a combined percentage of fossil fuels. Based on the facility's records for the most recent 12-month reporting period (1/2020 through 12/2020), the annual capacity factors provided were 11.54% for No. 6 fuel oil and 7.81% for natural gas individually, exceeding the maximum factor percentage of 10% combined. The exceedance of the annual factor is an alleged violation of the permit requirements and 40 CFR 60 Subpart Db avoidance. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management on January 27, 2021.

- C.57 – The facility is recording scrubber pressure drop and liquid flow every 15-minutes with an averaging time of 3 hours, as well as recording any corrective actions taken. On February 22, 2021, at 11:30 AM, the pressure drop was 4.3" W.C. with a 3-hour average of 4.22" W.C. and a range of ≥ 1.5 " W.C. The liquid flow was 81 gpm with a 3-hour average of 81.31 gpm and a range of ≥ 65 gpm. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on November 8, 2020 and started back up on December 5, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.58 - The facility is continuing to operate and maintain a CEMS for ID '2723'. The CEMS calibration is listed below for February 21, 2021:

Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.00	0.00 \pm 0.4	yes
Span	37.63	38.00 \pm 2.0	yes

The facility is calculating and recording 12-hour average TRS concentrations and O₂ daily, as well as any corrective actions taken. On February 22, 2021, the TRS 12-hour average was 1.45 ppmv @ 5.55% O₂ with a range of ≤ 8 ppmv @ 8% O₂. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on February 8, 2021 and started back up on the same day. The facility is calculating a 12-month rolling sum for lime production. For January 2021, the 12-month rolling sum for lime production was 228 tpy. An algorithm was available on-site at the time of the inspection. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

C.59 – The facility is recording monthly production rates for ID ‘2723’, as well as calculating a 12-month rolling sum on a monthly basis. For January 2021, the monthly production rate was 4,111 tons, with a 12-month rolling sum of 228 tpy. An algorithm was available on-site at the time of the inspection.

The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.60 – The facility is only burning No. 6 fuel oil and natural gas in ID ‘2723’. The facility representative indicated that an Oxygen Enrichment System is not in operation.
- C.61 – C.63 – The facility representative indicated that ID ‘2550’ has not run since 2017.
- C.64 – The opacity limit for IDs ‘2605’ and ‘3705’ is 40%. The facility did not exhibit an opacity during the inspection. The facility is maintaining records of any startups, shutdowns, or malfunctions. The process equipment was last shutdown on February 22, 2021 and started back up on the same day. The facility is continuing to operate and maintain a COMS on IDs ‘2605’ and ‘3705’. The COMS calibrations are listed below for February 21, 2021:

Equipment ID ‘2605’			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.45	0.00 ± 0.4	no
Span	38.76	36.00 ± 4.0	yes
Equipment ID ‘3705’			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.23	0.00 ± 0.4	yes
Span	34.91	36.00 ± 4.0	yes

The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.65 – The facility is conducting PM source tests every two years. The most recent PM source test was conducted on April 29, 2020. These units are subject to 40 CFR 64, Compliance Assurance Monitoring (CAM) (large units) and shall comply with all applicable provisions. The owner or operator shall continue to operate, calibrate, and maintain a continuous opacity monitoring systems (COMS) for showing compliance with SC *Std. 1* opacity standards for the CAM for the affected sources. Opacity as determined by each COMS and conditional source testing will be used as the CAM indicators to show reasonable assurance of continuing compliance with SC *Std 1* PM limitations. The facility is continuing to operate and maintain a COMS on IDs ‘2605’ and ‘3705’. The COMS calibrations are listed below for February 21, 2021:

Equipment ID '2605'			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.45	0.00 ± 0.4	no
Span	38.76	36.00 ± 4.0	yes
Equipment ID '3705'			
Type	Actual Reading	Expected Reading	Calibration Acceptable
Zero	0.23	0.00 ± 0.4	yes
Span	34.91	36.00 ± 4.0	yes

The facility is recording opacity readings every 10 seconds, with an averaging time of 6-minutes, as well as recording any corrective actions taken. On February 22, 2021, at 10:48 AM, the opacity reading for ID '2605' was 3.92% with a 6-minute average of 4% and a range of $\leq 10\%$. The opacity reading for ID '3705' was 9.17% with a 6-minute average of 11% and a range of $\leq 16\%$. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.66 – The facility is recording scrubber liquid flow and scrubber liquid pH at least once daily, as well as any corrective actions taken. On February 22, 2021, the scrubber liquid flow was 40 gpm with a range of ≥ 30 gpm. The scrubber liquid pH was 11.0 with a range of ≥ 10 . The facility is monitoring and recording on a daily basis the combination boiler that is combusting NCG streams, the daily bark fired in each combination boiler, and the daily Kraft pulp production. On February 22, 2021, ID '2605' was combusting NCG streams. The daily bark fired on February 22, 2021, was 366.37 tons in ID '2605' and 917.34 tons in ID '3705'. The daily Kraft pulp production on February 22, 2021, was 1,624 tons. The facility is calculating a daily bark/Kraft pulp production ratio, as well as a 30-day rolling average bark/Kraft pulp production ratio, for each operating day. On February 22, 2021, the daily bark/Kraft pulp production ratio was 0.23 with a 30-day rolling average bark/Kraft pulp production ratio of 0.49. The facility is maintaining records as required. The facility is only burning No. 6 fuel oil, natural gas, and tire derived fuel in IDs '2605' and '3705'. The facility is recording monthly fuel usage for each boiler. For ID '2605' in the month of January 2021, 29 gal of No. 6 fuel oil, 85,657,805 scf of natural gas, and 25 short tons of tire derived fuel were burned. For ID '3705' in the month of January 2021, 36,368 gal of No. 6 fuel oil, 98,548,049 scf of natural gas, and 41 short tons of tire derived fuel were burned. The facility is maintaining fuel oil supplier certifications on-site. The most recent certification was received with a shipment on January 29, 2021. The facility is calculating monthly SO₂ emissions, as well as a 12-month rolling sum. For January 2021, the monthly SO₂ emissions were 216.21 tons with a 12-month rolling sum of 1,194.76

typ. The facility is submitting semiannual reports. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.67 – The facility is annually testing representative samples of specification oil that is to be burned. The most recent annual test was conducted on May 29, 2020.
- C.68 –The facility is only burning tire derived fuel, spec oil, No. 6 fuel oil, and natural gas in IDs ‘2605’ and ‘3705’. The facility is monitoring and recording hourly TDF feed rate. On February 22, 2021, the hourly TDF feed rate was 1.31 tons per hour. The facility is conducting an analysis for each new TDF waste stream or new TDF supplier. The most recent analysis was conducted from January 14, 2021, to January 20, 2021. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.69 – The sources are subject to 40 CFR 64, CAM and shall comply with all applicable provisions. To meet the requirements of 40 CFR 64 for the affected sources, the indicator for TRS reduction will be the status of TRS venting or losses from the collection system of affected TRS sources required to be routed to boilers. The owner or operator will keep records of all venting, bypasses, and/or TRS losses that are exhausted to the atmosphere without being combusted in the boilers. The venting time period and source of the venting event shall be determined and recorded. As approved by the Department, the owner or operator shall continue to operate, and maintain a flame failure system for these boilers provide positive indication of vents when there is an absence of a flame in a boiler. The status of affected TRS streams shall be used to provide reasonable assurance of continuing compliance with *NSPS BB* TRS reduction requirements. The facility is determining and recording venting of TRS gases as required. The most recent venting event occurred on February 2, 2021. The facility is conducting monthly checks of the flame failure system and maintaining records as required. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.70 – The opacity limit for IDs ‘2901’, ‘9800’, ‘9801’, ‘9820’, ‘2605’, and ‘3705’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.71 – The facility is subject to 40 CFR 64, CAM and shall comply with all applicable provisions. To meet the requirements of 40 CFR 64 for the affected sources, the indicator for TRS reduction will be the status of TRS venting or losses from the collection system of affected TRS sources required to be routed to boilers. The owner or operator will keep records of all

venting, bypasses, and/or TRS losses that are exhausted to the atmosphere without being combusted in the boilers. The venting time period and source of the venting event shall be determined and recorded. As approved by the Department, the owner or operator shall continue to operate, and maintain a flame failure system for these boilers provide positive indication of vents when there is an absence of a flame in a boiler. The status of affected TRS streams shall be used to provide reasonable assurance of continuing compliance with *NSPS BB* TRS reduction requirements. The facility is determining and recording venting of TRS gases as required. The most recent venting event occurred on February 2, 2021. The facility is conducting monthly checks of the flame failure system and maintaining records as required. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management on January 27, 2021.

- C.72 – The opacity limit for ID ‘M10-223’ is 20%. The facility did not exhibit an opacity during the inspection.
- C.73 – The facility is maintaining records for ID ‘M10-223’ as required unless otherwise noted in the inspection. At the time of the inspection, records were reviewed from February 2019 through February 22, 2021, with no issues being noted.
- C.74 – The facility is conducting all non-enclosed operations in a manner that minimizes airborne particulate matter to the maximum extent possible. The facility is maintaining dust control of the premises and any roadways owned or controlled by the facility. The facility is controlling fugitive particulate matter emissions through proper housekeeping. The facility is performing and recording semiannual visual inspections, as well as any corrective actions taken. The most recent visual inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.75 – The opacity limit for ID ‘1299’ is 20%. The facility did not exhibit an opacity during the inspection. The facility is performing and recording semiannual visual inspections, as well as any corrective actions taken. The most recent visual inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.76 – The facility is maintaining records and supporting data and information as required by this condition, including a description of the project and identification of the emissions units whose emissions of a regulated NSR pollutant could be affected by the project, as well as a

description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant. The facility is monitoring the emissions of any regulated NSR pollutant that could increase as a result of the project, including NO_x and VOC, and calculating and maintaining records of annual emissions. For 2019, the annual NO_x emissions were 1,387.224 tons and the annual VOC emissions were 1,102.863 tons. The facility is keeping records of the average kappa number for the baseline for the project as well as recordings of the actual monthly average of the actual kappa number and a 12-month rolling average. For September 2020, the actual monthly average of the actual kappa number was 10.103 with a 12-month rolling average of 11.622. It should be noted that the facility is maintaining these records but not recording new information regarding the project due to ID '5240' being retired in September 2020.

- C.77 – This condition is informational in nature and the facility is aware of the requirements.
- C.78 – The facility representative indicated that ID '2550' has not operated since 2017.
- C.79 – C.85 – The facility has processes subject to NESHAP, Subpart JJJJ. For more information, see the NESHAP portion of the report.
- Section D – This table is informational in nature and the facility is aware of the requirements.
- E.1 – E.2 – The facility is submitting notifications and periodic reports to BAQ Air Toxics Section and US EPA as required. See specific NESHAP portions below for specific dates.
- E.3 – E.5 – The facility has processes subject to NESHAP, Subpart S. For more information, see the NESHAP portion of the report.
- E.6 – The facility has processes subject to NESHAP, Subpart MM. For more information, see the NESHAP portion of the report.
- E.7 – The facility has processes subject to NESHAP, Subpart JJJJ. For more information, see the NESHAP portion of the report.
- E.8 – E.9 – The facility has processes subject to NESHAP, Subpart ZZZZ. IDs '2906', '2907', and '2908' are all equipped with non-resettable hour meters. On February 22, 2021, the current hour meter readings were as follows: 59.4 hrs for '2906', 191.0 hrs for '2907', and 188.0 hrs for '2908'. ID '2906' was last run on September 18, 2020, for 30 minutes for the purpose of preventative maintenance, with the last annual maintenance being conducted on September 18, 2020. ID '2907' was last run on February 16, 2021, for 15 minutes for the purpose of preventative maintenance, with the last annual maintenance being conducted on August 18, 2020. ID '2908' was last run on February 15, 2021, for 15 minutes for the purpose of

preventative maintenance, with the last annual maintenance being conducted on April 21, 2020.

- E.10 – E.11 – The facility has processes subject to NESHAP, Subpart DDDDD. For more information, see the NESHAP portion of this report.
- F.1 – This condition is informational in nature and the facility is aware of the requirements.
- G.1 – This condition is informational in nature and the facility is aware of the requirements.
- H.1 – The facility is maintaining a list of exempt sources/insignificant activities on-site, which was available for review during the inspection.
- I.1 – The facility has been keeping BAQ Air Permitting Division updated on any changes that may affect air dispersion modeling or emission rates. The most recent update was received on April 16, 2020, via a revision request for Construction Permit DF
- Section J – Section K – These sections are informational in nature and the facility is aware of the requirements.
- L.1 – The facility is submitting reports to the Department in a timely manner. The most recent report was received on by BAQ Technical Management Section on January 27, 2021.
- L.2 – L.4 – These conditions are informational in nature and the facility is aware of the requirements.
- L.5 – The facility is maintaining records as required unless otherwise noted in the inspection. At the time of the inspection, records were reviewed from the date of the previous inspection, August 26, 2019, to February 22, 2021, with no issues noted.
- L.6 – The facility is notifying the Regional office within 24 hours after the beginning of a malfunction, as well as submitting a written report within 30 days of the occurrence. The most recent malfunction occurred on February 2, 2021.
- L.7 – The facility is certifying annual compliance with the conditions of this permit as required. The most recent annual compliance certification was received by BAQ Technical Management Section on August 3, 2020.
- L.8 – This condition is informational in nature and the facility is aware of the requirements.
- M.1 – M.15 – These conditions are informational in nature and the facility is aware of the requirements.
- M.16 – The facility is prepared to demonstrate affirmative defense in an emergency through properly signed logs and other relevant information.

- M.17 – M.20 – These conditions are informational in nature and the facility is aware of the requirements.
- M.21 – The facility has currently paid all air fees. The most recent fee payment occurred on September 8, 2020.
- M.22 – The facility is submitting updated emissions inventories as required. The most recent emissions inventory was received by the Department on March 31, 2020.
- M.23 – This condition is informational in nature and the facility is aware of the requirements.

Construction Permit DF:**Issued on July 23, 2019 – Start of Operation February 1, 2021****A. PROJECT DESCRIPTION**

Permission is hereby granted to convert the Kraft fiberline from manufacturing pulp for bleached paper grades to manufacturing pulp for unbleached or brown paper. This project includes converting the No. 3 Coated Paper Machine to manufacture linerboard and the Pulp Dryer (both in TV ID 06) to process unbleached pulp. The project also includes retiring the Bleach Plant (TV ID 03), Chlorine Dioxide Plant (TV ID 04), the TMP Process (TV ID 05), the No. 1 Paper Machine, No. 1 Coater, No. 2 Coater (all in TV ID 06), No. 1 Power Boiler (TV ID 08), and the Methanol Storage Tank (TV ID 10). The changes to each Title V (TV) emission unit are described below. Conditions pertaining to the retired equipment, will be removed from the TV operating permit upon inclusion of this construction permit.

2020 REVISION

Permission is granted to change the treatment option for the pulping process condensates (foul condensates) under 40 CFR 63, Subpart S – NESHAPs from the Pulp and Paper Industry from the use of the condensate steam stripper to hard piping the foul condensate under the liquid level at the wastewater treatment system. The steam stripper (TV EU ID 09, Equipment ID 9801), along with the Stripper Off Gases (SOG) Collection System (TV EU 09, Equipment ID 9280), will be retired in place. There are no physical changes planned to the wastewater treatment system other than the new hard pipe.

Equipment and Control Devices:

- Unit ID 01 – Woodyard Area
- Unit ID 02 – *Modify* – Kraft Process – Kraft Pulp Mill w/ Control Devices '5270', '2605', and '3705'

- Equipment ID '5210' (*Modify* – Continuous Digester System: Digester Chip, Bin, Continuous Digester, Chip Feed System, Blow Tank, Steam Economizer and Reboiler; *Adding* – Pressure Refiners A and B) w/ Control Devices '5270', '2605', and '3705'
- Equipment ID '5220' (Turpentine Recovery System: Gas Cooler, Condenser, Decanter) w/ Control Devices '5270', '2605', and '3705'
- Equipment ID '5230' (*Modify* – Pulp Washing System: Pressure Diffuser, Filtrate Tank; *Adding* – 3 Stage Brownstock Washer Lines with Filtrate Tanks (2 Lines in parallel, repurposed No. 1 Post O₂ Washer, D0 Washer, D1 Washer, D2 Washer, Eop Washer), Brown Stock Liquor Surge Tank, Washed Stock Storage Tank (repurposed HD Tank)) w/ Control Devices '5270', '2605', and '3705'
- Equipment ID '5240' (*Retire in Place* – Oxygen Delignification System: No.1O₂ Reactor, Blow Tube, No. 1 Post O₂ Washer, No.1 PostO₂ Filtrate Tank, No.2 O₂ Reactor, Blow Tube, No. 2 O₂ Post Washer, No.2O₂ Post Filtrate Tank, Post O₂ Surge Tank, No. 1B O₂ Reactor) w/ Control Devices '5270', '2605', and '3705'
- Equipment ID '5250' (*Retire in Place* – Knotting and Screen System: HD Tank, Primary Knotters (2), Secondary Knotters (2), No. 1 Primary Screen, No. 2 Primary Screen, Secondary Screen, Tertiary Screen, Quaternary Screen, Cleaner, Shive Thickener, Screen Room Filtrate Tank, Screen Room Washer) w/ Control Devices '5270', '2605', and '3705'
- Equipment ID '5255' (*Adding* – Pulp Refining and Washing: Deshive Refiners (2), Screw Presses (2), Screw Press Filtrate Tank, Filtrate Screen) w/ Control Devices '5270', '2605', and '3705'
- Unit ID 03 – *Retire in place* – Kraft Process – Bleach Plant
- Unit ID 04 – *Retire in place* – Kraft Process – Chlorine Dioxide Plant
- Unit ID 05 – *Retire in place* – TMP Process
- Unit ID 06 – *Modify* – Paper Mill w/ Control Device 'B-2000'
 - Equipment ID '2000' (*Retire in place* – 171.850 ADT Paper/Year No. 1 Paper Machine: Cleaner System, Deculator System, Precondenser System, Vacuum Pump System, Screen System, Mix Tub, Headbox System, Forming Wire, Vacuum Blower, Vacuum Trench, Save-All System, Presses, Separators, Press Pulper, Dryer

- Systems, Dryer Pulper Calendar, Dry End Pulper, Reel, Slurry Mix Tanks, Mix Tanks)
- Equipment ID '2005' (*Retire in place* – No. 1 Paper Machine Rereeler and Trim Pulper)
 - Equipment ID '2010' (*Retire in place* – No. 1 Coat Dryer, 48 million Btu/hr fired on Natural Gas, Propane, or Kerosene: Coater System, Coating Dryer, Screen/Filters, Reel, and Coated Broke Pulper)
 - Equipment ID '4600' (*Modify* – No. 2 Paper Machine: Cleaner System, Deculator System, Precondenser, Vacuum Pump System, Screen System, Headbox System Forming Wire, Vacuum Blower, Vacuum Trench, Save-All System, Press System, Press Pulper, Dryer Systems, Dryer Pulper, Calendar, Dry End Pulper, Reel, Slurry Mix Tanks, Mix Tanks)
 - Equipment ID '4605' (*Modify* – No. 2 Paper Machine Rereeler and Trim Pulper)
 - Equipment ID '4610' (*Retire in place*)
 - 2 Coat Dryer, 64 million Btu/hr fired on Natural Gas, Propane, or Kerosene: Coating System, Coating Dryer, Screens/Filters, Reel, and Coated Broke Pulper)
 - Equipment ID '4100' (*Modify* – No. 3 Paper Machine: Mixed Stock Chest, Stock Refining System, Cleaner System, Deculator System, Precondenser, Mixing Silo, Vacuum Pump System, Vacuum Trench, Screen System, Headbox System, Mix Eliminator, Vacuum Blowers, Forming Wire, Press System, Press Pulper, Dryer Systems, Economizer, Dry End Pulper, Steam Dryer, Reel, Reel Pulp, Winder, Trim Pulper; *Retire and remove* – Die Mix Tank, Filters, Two-sided Rod Coater System, Coating Preparation System, Coating Mix Tank, Coating Supply Tank, Calendars, Calendar Pulper)
 - Equipment ID '4110' (*Retire and Remove*–16 million Btu/hr Air Flotation Dryer equipped with Low NO_x burners, fired on Natural Gas, Propane, or Kerosene)
 - Equipment ID '4120' (*Retire and remove* – Infrared Dryer with total heat input of 22.6 million Btu/hr, fired on Natural Gas, Propane, or Kerosene)
 - Equipment ID '4130' (*Retire and remove* – 9.1 million Btu/hr Hot Oil Heating System, fired on Natural Gas, Propane, or Kerosene)
 - Equipment ID '2100' (*Modify* – Pulp Dryer: Stock Cleaning, Refining and Screening System, Decker, Headbox System, Cylinder Mold, Hood Exhaust System, Vacuum

- System, Press System, Press Pulper, Dryers, Economizer, Dry End Pulper, Steam heated Booster Oven on dry end, Cutter, Stacker)
- Equipment ID '9700' (*Retire in place* – Four – Starch Silos, Slurry Mix Tanks, Starch Cookers, Flash Tank, Mix Tanks) w/ Control Device 'B-2000'
 - Equipment ID '9701A' (*Retire in place* – 1,400-gallon Slurry Tank)
 - Equipment ID '9701B' (*Retire in place* – 1,400-gallon Slurry Tank)
 - Equipment ID '9702' (*Retire in place* – Starch Cooker)
 - Equipment ID '9703' (*Retire in place* – Flash Tank)
 - Equipment ID '9704' (*Retire in place* – 2,900-gallon Paste Tank)
 - Control Device 'B-2000' (*Retire in place* – Two – Starch Silo Bag Houses)
 - Unit ID 07 – *Modify* – Chemical Recovery w/ Control Devices '5260', '5260C', '2605', and '3705'
 - Equipment ID '2400' (*Modify* – No. 1 Multi-Effect Evaporator Set with concentrator) w/ Control Devices '5260', '5260C', '2605', and '3705'
 - Unit ID 08 – *Modify* – Utilities
 - Equipment ID '2550' (*Retire in place* – 342-375 million Btu/hr Power Boiler, fired on natural gas, No. 6 fuel oil; 225,000 lb/hr maximum steaming rate on any fuel)
 - Unit ID 09 – *Modify* – Waste Treatment w/ Control Devices '2605' and '3705'
 - Equipment ID '2901' (Aerated Biotreatment)
 - Equipment ID '9800' (180,000-gallon Foul Condensate Collection Tank (from NCG Systems)) w/ Control Devices '2605' and '3705'
 - Equipment ID '9801' (*Retire in place* – 800 gallon/minute Condensate Steam Stripper) w/ Control Devices '2605' and '3705'
 - Equipment ID '9820' (*Retire in place* – Stripper Off Gases (SOGs) Collection System) w/ Control Devices '2605' and '3705'
 - Control Device '2605' (B&W No. 1 Combination Boiler)
 - Control Device '3705' (B&W No. 2 Combination Boiler)
 - Unit ID 10 – *Retire in place* – Storage Tanks
 - Unit ID 12 – *Modify* – HD Pulp Storage Tanks

Permit Conditions:**The following Monitoring and Reporting conditions were verified:**

- C.1 – The facility had a copy of their Department issued permit on-site and is maintaining records as required unless otherwise noted in the inspection. At the time of the inspection, records were reviewed from the date of the previous inspection, August 26, 2019, to February 22, 2021, with no issues noted.
- C.2 – The facility is maintaining all continuous monitoring systems and gauges in accordance with manufacturer's specifications. The facility is maintaining all measurements and maintenance, including corrective actions taken, on file. The most recent inspection was conducted on February 22, 2021. The most recent calibration was conducted on February 21, 2021. See NESHAP portion of the inspection for calibrations required by the specific NESHAP Subparts.
- C.3 - All gauges were readily accessible and easily read. The facility is maintaining and recording parameter readings and maintenance checks, as well as any corrective actions taken noting date, time, and cause of deviation. The most recent inspection was conducted on February 22, 2021. The most recent calibration was conducted on February 21, 2021. The most recent maintenance was conducted on January 19, 2021. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.4 –This condition is informational in nature and the facility is aware of the requirements.
- C.5 – See specific conditions in the TV portion of the inspection for compliance with NSPS BB.
- C.6 – See NESHAP portion of the inspection for compliance with NESHAP Subpart A and SS.
- C.7 – The facility is conducting and recording semiannual visual emissions inspections, as well as any corrective actions taken. The most recent visual emissions inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.
- C.8 – The opacity limit for IDs '5210', '5230', '5255', '4600', '4605', '4100', '2100', and '2400' is 20%. The facility did not exhibit an opacity during the inspection.
- C.9 – The facility is conducting and recording semiannual visual emissions inspections, as well as any corrective actions taken. The most recent visual emissions inspection was conducted on December 29, 2020. The facility is submitting semiannual reports to the Department. The most recent report was received by BAQ Technical Management Section on January 27, 2021.

- C.10 – This condition is informational in nature and the facility is aware of the requirements.
- C.11 – The facility has resumed regular operations and is calculating TRS and VOC annual emissions. The facility has not had to submit a report regarding emissions exceeding the baseline but is aware of the requirements should this change.
- C.12 – The facility is subject to the applicability of §60.280a.
- C.13 – See the TV portion and NESHAP portion of the inspection.
- C.14 – The facility is maintaining records for excess emissions as required by §60.288a(a) and is reporting the excess emissions as required to BAQ Technical Management Section semiannually. The first report required under CP-Df is due July 30, 2021.
- C.15 – These sources are subject to *40 CFR 64, Compliance Assurance Monitoring (CAM)*, and shall comply with all applicable provisions. The Bureau considers the required use of boiler with heat input capacity greater than or equal to 44 megawatts (150 million British thermal units per hour) by introducing the HAP emission stream with the combustion air required by *NESHAP 40 CFR 63, Subparts A and S (MACT S)*, along with recording any bypass vent times and other TRS collection system losses to be presumptively acceptable CAM monitoring pursuant to 40 CFR 64.2(b)(1)(i) for reasonable assurance of compliance with the TRS limitations of 40 CFR 60 Subpart BBa. The facility is determining and recording venting of TRS gases as required. The most recent venting event occurred on February 2, 2021. See TV portion of inspection. The first report under CP-DF is not due until July 30, 2021.
- C.16 – This condition is informational in nature and the facility is aware of the requirements to file affirmative defense.
- C.17 – The facility is maintaining continuous monitoring systems records as required by this condition.
- C.18 – The facility is submitting semiannual reports to the department. The first report under CP-DF is due July 30, 2021.
- Section D – This table is informational in nature and the facility is aware of the requirements.
- E.1 – E.2 – The facility is submitting notifications and periodic reporting to BAQ Air Toxics Section and EPA as required. See specific NESHAP portion of the inspection for submittal dates.
- E.3 – E.5 – The facility has processes subject to NESHAP, Subpart S. For more information, see the NESHAP portion of the inspection.

- E.6 – E.7 – The facility has processes subject to NESHAP, Subpart ZZZZ. IDs ‘2906’, ‘2907’, and ‘2908’ are all equipped with non-resettable hour meters. On February 22, 2021, the current hour meter readings were as follows: 59.4 hrs for ‘2906’, 191.0 hrs for ‘2907’, and 188.0 hrs for ‘2908’. ID ‘2906’ was last run on September 18, 2020, for 30 minutes for the purpose of preventative maintenance, with the last annual maintenance being conducted on September 18, 2020. ID ‘2907’ was last run on February 16, 2021, for 15 minutes for the purpose of preventative maintenance, with the last annual maintenance being conducted on August 18, 2020. ID ‘2908’ was last run on February 15, 2021, for 15 minutes for the purpose of preventative maintenance, with the last annual maintenance being conducted on April 21, 2020. Also see NESHAP portion of the inspection.
- E.8 – The facility has processes subject to NESHAP, Subpart DDDDD. For more information, see the NESHAP portion of the report.
- F.1 – The facility has not made any changes in the parameters used in the air dispersion modeling.
- Section G – This section is informational in nature and the facility is aware of the requirements.
- H.1 – The facility is submitting reports to the Department in a timely manner. The first report under CP-DF is due July 30, 2021.
- H.2 & H.4 – These conditions are informational in nature and the facility is aware of the requirements.
- H.3 – The BAQ Air Permitting Division received notification on February 11, 2021, notifying the Department to incorporate CP-DF into the TV Permit.
- H.5 - The facility is notifying the Regional office within 24 hours after the beginning of a malfunction, as well as submitting a written report within 30 days of the occurrence. The most recent malfunction occurred on February 2, 2021.
- I.1 – I.2 – These conditions are informational in nature and the facility is aware of the requirements.
- J.1 – The facility notified BAQ Air Permitting Division on February 11, 2021.
- J.2. – J.3 – These conditions are informational in nature and the facility is aware of the requirements.
- J.4 – The facility has submitted a written request to the Department for a new or revised operating Title V permit within 15 days of initial startup. Regular operation was resumed on February 1, 2021. The permit application was received on February 11, 2021.

- K.1 – The facility has currently paid all air fees to the Department. The most recent fee payment occurred on September 8, 2020.
- K.2 – The facility is prepared to demonstrate affirmative defense in an emergency through properly signed logs and other relevant information.
- K.3 – K.5 – These conditions are informational in nature and the facility is aware of the requirements.

NESHAP, Subpart EEEE

Semiannual Reports: N/A

Initial Notification: May 11, 2004

Facility Details

Equipment for Emissions Unit ID 10 – Storage Tanks

Equipment ID	Equipment Description	Installation Date/Modification Date	Control Device ID	Emission Point ID
M10-223	39,023-Methanol Tank	post 1984	None	1100

- A. Equipment: 1 Methanol Storage tank with a capacity of 39,023 gallons
- B. Vapor pressure is not 4.0 PSIA or greater for the Methanol storage tank
- C. Reporting Requirements: None (Facility is not required to submit Semi Annual reports)
- D. Methanol Tank has no applicable emissions limits or work practice standards

No Control Requirements for Methanol Storage Tank for Subpart EEEE

Facility Should have Onsite Up to Date Documentation Verifying the Info Below:

(3) For each storage tank that meets the conditions identified in paragraph (b) of this section, you must keep documentation, including a record of the annual average true vapor pressure of the total Table 1 organic HAP in the stored organic liquid, that verifies the storage tank is not required to be controlled under this subpart. The documentation must be kept up-to-date and must be in a form suitable and readily available for expeditious inspection and review according to 63.10(b)(1), including records stored in electronic form in a separate location.

The facility did have these records available for review during the inspection.

NESHAP, Subpart DDDDD

New-Indy Catawba, LLC. is subject to 40 CFR 63, Subpart DDDDD because they are a major source of HAPs and operate industrial boilers or process heaters.

- 63.7495 – The facility operates three boilers (Combination Boiler No. 1, Combination Boiler No. 2, and Power Boiler) and one process heater (No. 3 Coated Paper Machine Hot Oil Heater) classified as existing units for which the compliance date was January 31, 2016.
- 63.7499 – Combination Boiler No.1 (2605) and Combination Boiler No. 2 (3705) are classified as units designed to burn solid fuel and hybrid suspension grate burners designed to burn wet biomass/bio-based solid. Paper Machine 3 Hot Oil Heater (4130) is a unit designed to burn gas 1 fuels but was permanently retired May 11, 2020. Power Boiler (2550) is classified as a limited use boiler per DHEC construction permit 2440-0005-DD but was permanently retired August 12, 2020.
- 63.7500 – 2605 and 3705 must meet each emission limit in Table 2 for units designed to burn solid fuel and hybrid suspension grate units designed to burn biomass/bio-based solid and the work practice standards in Table 3, Items 3, 4, 5, and 6; the standards apply at all times 2605 and 3705 are operating, except during periods of startup and shutdown during which 2605 and 3705 must only comply with the work practice standards.

Per 63.7500(a) and Tables 1 and 2, 2605 and 3705 must comply with the following emission limits:

Pollutant	2605 and 3705
PM	0.44 lb/MMBtu of heat input
Hydrogen Chloride (HCl)	0.022 lb/MMBtu of heat input
Mercury (Hg)	5.7 x 10 ⁻⁶ lb/MMBtu of heat input
Carbon Monoxide (CO)	3,500 ppmvd @ 3% O ₂ or 900 ppmvd @ 3% O ₂ on a 30-day rolling average

Per 63.7500(a)(2), The facility must meet each operating limit in Table 4 to this subpart that applies to each boiler or process heater. The facility set the following limits for each boiler:

Combination Boiler No. 1			
Parameter	Established Limit	Instantaneous Reading	Date/Time Taken
Opacity	≤10% (daily block average)	3.92%	February 22, 2021 @10:48 AM
Oxygen Content	≥ 4.2%	7%	February 23, 2021 @2:24 PM
Boiler Operating Load	314.9 kpph (30-day rolling average)	227 kpph	February 23, 2021 @2:23 PM

Combination Boiler No. 2			
Parameter	Established Limit	Instantaneous Reading	Date/Time Taken
Opacity	≤10% (daily block average)	9.17%	February 22, 2021 @10:48 AM
Oxygen Content	≥7.0%	9%	February 23, 2021 @2:25 PM
Boiler Operating Load	373.3 kpph (30-day rolling average)	150 kpph	February 23, 2021 @2:25 PM

Per 63.7500(f), the standards apply at all times the units are operating, except during periods of startup and shutdown during which time the facility must comply only with items 5 and 6 of Table 3.

- The facility did operate the CMS during startup and shutdown for 2605 and 3705.
- The facility did collect the monitoring data during startup and shutdown for 2605 and 3705.
- 63.7505 - Per 63.7505(c), the facility must demonstrate compliance with all applicable emissions limits using performance stack testing, fuel analysis, or continuous monitoring systems.

For 2605 and 3705 the facility has elected to demonstrate compliance for HCl, Hg, CO, and PM using performance testing.

Per 63.7505(d), the facility must develop a site specific monitoring plan for the use of any CEMS, COMS, or CPMS if they demonstrate compliance with any applicable emission limit through performance testing and subsequent compliance with operating limits.

For 2605 the facility has elected to demonstrate compliance with operating limits using a COMS, O₂ monitor, and a CMS for steam flow (steam flow meter).

- The facility did have a site-specific monitoring plan for the steam flow meter, O₂ monitor, and COMS on 2605.

For 3705 the facility has elected to demonstrate compliance with operating limits using a COMS, O₂ monitor, and a CMS for steam flow (steam flow meter).

- The facility did have a site-specific monitoring plan for the steam flow meter, O₂ monitor, and COMS on 3705.
- 63.7510 - Per 63.7510(a), the facility must conduct the initial performance testing of 2605 and 3705 according to 63.7520 and Table 5. 2605 and 3705 burn multiple types of fuel and are required to conduct a fuel analysis according to 63.7521 and Table 6. Operating limits for 2605 and 3705 must be established according to 63.7530 and Table 7. CMS performance evaluations must be performed according to 63.7525. Per 63.7510(e), the facility was required

to demonstrate initial compliance of 2605 and 3705 with the emissions limits no later than 180 days following the compliance date (no later than July 29, 2016). 2605, 3705, and 4130 were required to conduct initial tune ups and an energy assessment no later than the compliance date. 2550 was required to conduct an initial tune-up no later than the compliance date.

The facility conducted the initial performance test of 2605 and 3705 on February 2-4, 2016, during which the operating limits were established.

Per 63.7510(b), the facility must conduct a fuel analysis for each type of fuel burned in 2605 and 3705 according to 63.7521 and Table 6 and establish operating limits according to 63.7530 and Table 8 to demonstrate compliance with HCl and Hg emission limits.

Per 63.7510(e), the facility is required to complete initial tune ups of 2605, 3705, 4130, and 2550 according to 63.7540(a)(10)(i) through (vi) no later than the January 31, 2016. The facility is required to complete a one-time energy assessment for 2605, 3705, and 4130 as specified in Table 3 to this subpart no later than January 31, 2016.

- CB1 (2605): The initial tune-up was performed on January 26, 2016. The one-time energy assessment was performed on January 27, 2014.
- CB2 (3705): The initial tune-up was performed on January 26, 2016. The one-time energy assessment was performed on February 11, 2014.
- PM3 Hot Oil Heater (4130): The initial tune-up was performed on January 8, 2016. The one-time energy assessment was performed on October 7, 2014.
- Power Boiler (2550): The initial tune up was performed on January 15, 2016.
- 63.7515 - Per 7515(a), the facility must conduct annual performance tests to demonstrate compliance with the PM, HCl, Hg, and CO emission limits for 2605 and 3705. Annual performance tests must be completed no more than 13 months after the previous performance test date. Per 7515(b), if the performance tests for a given pollutant for at least 2 consecutive years show that the emissions are at or below 75% of the emission limit for the pollutant, and if there are no changes in the operation of the boiler or air pollution control equipment that could increase emissions, the facility may choose to conduct performance tests for the pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test.
 - The facility performed the initial stack test and fuel analysis for 2605 and 3705 on February 2-4, 2016 and a subsequent stack test was performed on March 7-9, 2017.

Per 63.7515(d), the facility must conduct annual, biennial, or 5-year performance tune-ups according to 63.7540(a)(10), (11), or (12).

- 2605 is required to perform tune-ups annually. The subsequent tune-up is required to be performed before February 26, 2017. A subsequent tune-up has been performed. If yes, the subsequent tune-up was performed on November 9, 2016. The most recent tune-up was performed November 23, 2020. The next tune-up must be performed before November 23, 2021.
- 3705 is required to perform tune-ups annually. The subsequent tune-up is required to be performed before November 8, 2016. A subsequent tune-up has been performed. The most recent tune-up was performed August 4, 2020. The next tune-up must be performed before August 4, 2021.
- 4130 is required to perform tune-ups biennially. The subsequent tune-up is required to be performed before February 8, 2018. A subsequent tune-up has been performed. If yes, the subsequent tune-up was performed on February 5, 2020.
- 2550 is required to perform tune-ups every 5 years. The subsequent tune-up is required to be performed before February 15, 2021. A subsequent tune-up has not been performed. This unit was retired May 11, 2020.
- 63.7521 –Per 63.7521(b), the facility was required to conduct fuel analyses for 2605 and 3705 as specified in 63.7510 and therefore must develop a site-specific fuel monitoring plan.
 - The facility did have a site-specific fuel monitoring plan.
- 63.7525 – Per 63.7525(c), 2605 and 3705 are demonstrating compliance with the PM emission limits by monitoring opacity. The facility must install, operate, certify, and maintain each COMS according to the procedures in paragraphs (c)(1) through (7). The following should be verified during the inspection:
 - (c)(1) Each COMS must be installed, operated, and maintained according to Performance Specification 1 at Appendix B to Part 60 of this chapter.
 - (c)(2) You must conduct a performance evaluation of each COMS according to the requirements in 63.8(e) and according to Performance Specification 1 at Appendix B to Part 60 of this chapter.
 - (c)(3) As specified in §63.8(c)(4)(i), the 2605 and 3705 COMS must 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.

(c)(4) The COMS data must be reduced as specified in §63.8(g)(2).

(c)(5) The facility must include in the site-specific monitoring plan procedures and acceptance criteria for operating and maintaining the 2605 and 3705 COMS and, at a minimum, the monitoring plan must include a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit of the 2605 and 3705 COMS.

(c)(6) The facility must identify periods the COMS is out of control including any periods that the COMS fails to pass a daily calibration drift assessment, a quarterly performance audit, or an annual zero alignment audit. Any 6-minute period for which the monitoring system is out of control and data are not available for a required calculation constitutes a deviation from the monitoring requirements.

(c)(7) You must determine and record all the 6-minute averages collected for periods during which the COMS is not out of control.

- The facility did meet the above listed requirements in 63.7525(c) for the COMS on 2605.
- The facility did meet the above listed requirements in 63.7525(c) for the COMS on 3705.

Per 63.7525(d) 2605 and 3705 must install, operate, and maintain each CMS (i.e. steam flow meters and O2 monitoring system on 2605) according to the procedures in paragraphs (d)(1) through (5) of this section. The following should be verified during the inspection:

(d)(1) The monitoring systems must complete a minimum of one cycle of operation every 15-minutes. The facility must have a minimum of four successive cycles of operation, one representing each of the four 15-minute periods in an hour, to have a valid hour of data.

(d)(2) The facility must operate the monitoring systems as specified in 63.7535(b) and comply with the data calculation requirements specified in 63.7535(c).

(d)(3) Any 15-minute period for which the monitoring system is out-of-control and data are not available for a required calculation constitutes a deviation from the monitoring requirements. Other situations that constitute a monitoring deviation are specified in 63.7535(d)

(d)(4) The facility must determine the 30-day rolling average of all recorded readings, except as provided in 63.7535(c).

(d)(5) The facility must record the results of each inspection, calibration, and validation check.

- The facility did meet the above listed requirements in 63.7525(c) for the steam flow meter and O2 monitoring system on 2605.
- The facility did meet the above listed requirements in 63.7525(c) for the steam flow meter on 3705.

- 63.7530 – The facility must demonstrate initial compliance with each emission limit that applies by conducting initial performance tests and establishing operating limits according to 63.7520 paragraphs (b) and Tables 5 and 7. If applicable, the facility must also install, operate, and maintain all applicable CMS (including CEMS, COMS, and CPMS) according to 63.7525. Per 63.7530(b), If the facility demonstrates compliance through stack testing, the facility must conduct fuel analyses according to 63.7521 and establish maximum fuel pollutant input levels according to paragraph (b)(1) through (3), as applicable, and as specified in 63.7510(a)(2).

- 2605:

The maximum chlorine input level is 0.0273 lb/mmBtu.

The maximum Mercury input level is 4.14×10^{-6} lb/mmBtu.

- 3705:

The maximum chlorine input level is 0.0394 lb/mmBtu.

The maximum Mercury input level is 5.33×10^{-6} lb/mmBtu.

Per 63.7530(h), 2605 and 3705 must meet the work practice standards according to Items 5 and 6 of Table 3 during startup and shutdown.

- The facility does meet the required work practice standards during startup and shutdown.

- 63.7535 – 2605 and 3705 are required to collect monitoring data for the COMS, O₂ monitoring system, and steam flow meter in accordance with the site-specific monitoring plan and the following:

(b) The facility must operate the monitoring system and collect data at all required intervals at all times that 2605 and 3705 are operating and compliance is required, except for periods of monitoring system malfunctions or out of control periods, and required monitoring system quality assurance or control activities, including, as applicable, calibration checks, required zero and span adjustments, and scheduled CMS maintenance as defined in the site-specific monitoring plan. The facility is required to complete monitoring system repairs in response to monitoring system malfunctions or out-of-control periods and to return the monitoring system to operation as expeditiously as practicable.

(c) The facility must record and make available results of CMS performance audits and dates and duration of periods when the CMS is out of control to completion of the corrective actions necessary to return the CMS to operation consistent with the site-specific monitoring plan. The

facility must use all the data collected during all other periods in assessing compliance and the operation of the control device and associated control system.

(d) Except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, system accuracy audits, calibration checks, and required zero and span adjustments), failure to collect required data is a deviation of the monitoring requirements. The facility must calculate monitoring results using all other monitoring data collected while the process is operating. The facility must report all periods when the monitoring system is out of control in the semiannual report.

- The facility did collect monitoring data as required above.

- 63.7540 – 2605 and 3705 must demonstrate continuous compliance with each emission limit in Tables 1 or 2, the work practice standards in Table 3, and the operating limits in Table 4 that apply according to the methods specified in Table 8 and paragraphs (a)(1), (2), (4), (6), (10), (11) and (12). The following should be verified during the inspection:

(a)(2) The facility must keep records of the type and amount of all fuels burned in 2605 and 3705 during the reporting period.

(a)(2)(ii) The facility must demonstrate that all fuel types and mixtures of fuels burned in 2605 and 3705 would result in equal to or lower fuel input of chlorine and mercury than the maximum values calculated during the last performance test.

(a)(4) The facility must recalculate the maximum chlorine input if they plan to burn a new type of fuel or a new mixture of fuels. If the results of recalculating the maximum chlorine input using Equation 7 of 63.7530 are greater than the maximum chlorine input level established during the previous performance test, then the facility must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in 63.7520 to demonstrate that the chlorine emissions do not exceed the emission limit.

(a)(6) The facility must recalculate the maximum mercury input if they plan to burn a new type of fuel or a new mixture of fuels. If the results of recalculating the maximum mercury input using Equation 8 of 63.7530 are greater than the maximum mercury input level established during the previous performance test, then the facility must conduct a new performance test within 60 days of burning the new fuel type or fuel mixture according to the procedures in 63.7520 to demonstrate that the mercury emissions do not exceed the emission limit.

(a)(10) 2605 and 3705 have a heat input capacities of 10 million Btu per hour or greater and must conduct annual tune-ups to demonstrate continuous compliance as specified in paragraphs (a)(10)(i) through (vi) of this section. The facility must conduct the tune-ups while burning the type of fuel (or fuels in case of units that routinely burn a mixture) that provided the majority of the heat input to the boiler or process heater over the 12-months prior to the tune-up.

(a)(10)(vi) Maintain on-site, an annual report containing the information in paragraphs (a)(10)(vi)(A) and (B) of this section,

(a)(10)(vi)(A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;

(a)(10)(vi)(B) A description of any corrective actions taken as a part of the tune-up; and

(a)(10)(vi)(C) The type and amount of fuel used over the 12-months prior to the tune up, but only if the unit was physically and legally capable of using more than one type of fuel during that period.

- Per 63.7540(a)(1), the facility did not have deviations from the established operating limits.
- Per 63.7540(b), the facility did not report the deviations in the latest semiannual report.
- The facility did not burn a new type of fuel or fuel mixture in 2605. If yes, the facility did recalculate the maximum chlorine and mercury input.
- The facility did not burn a new type of fuel or fuel mixture in 3705. If yes, the facility did recalculate the maximum chlorine and mercury input.
- 63.7545 - Per 63.7545(a), the facility must submit to the Bureau (and copies to EPA Region 4) all of the notifications in 63.7(b) and (c), 63.8(e), (f)(4) and (6), and 63.9(b) through (h) that apply by the dates specified.
 - The Bureau received the Initial Notification for 2605, 3705, 2550, and 4130 on May 22, 2013. The Bureau received the Notification of Compliance Status for 2605, 3705, 2550 and 4130 on March 29, 2016. An updated NOCS for 2605 and 3705 was received July 17, 2018.
- 63.7550 – Per 63.7550(a) and (b), the facility is required to submit semiannual compliance reports for 2605 and 3705, a biennial compliance report for 4130, and a 5-year compliance report for 2550.

- The Bureau received the first semiannual report for 2605 and 3705 on January 31, 2017. The most recent semiannual report for 2605 and 3705 was received January 27, 2021. The next semiannual report is due by July 31, 2021.
- The facility did submit the required reports to the EPA electronically.
- Recordkeeping – The facility must comply with the following recordkeeping requirements from the General Provisions (63.10(b) and (c)) and Boiler MACT (63.7555) for the COMS, O₂ monitoring systems, and steam flow meter when CMS is referenced, and for the boilers when process equipment is referenced:

Per 63.10(b)(1), (b)(2)(viii), (b)(2)(ix), and 63.7555(a), the facility is required to maintain files of all information for at least 5 years. This information includes all reports, notifications, maintenance, corrective actions, performance tests, fuel, analyses, CPMS performance evaluations, opacity and visible emission observations, and measurements as may be necessary to determine the conditions of performance tests and performance evaluations.

- During the inspection, a representative sample of documents were reviewed. The facility did have the documentation.

Per 63.10(b)(2)(iii), (x), and (xi), the facility is required to maintain the following records: all required maintenance performed on the air pollution control and monitoring equipment; all CMS calibration checks; and all adjustments and maintenance performed on CMS.

- During the inspection, a representative sample of documents were reviewed. The facility did have the documentation.

Per 63.10(b)(2)(vii) and (c)(1), and 63.7555(c), the facility is required to maintain records of each measurement of a control device operating parameter monitored at least once every 15 minutes and daily average values of each continuously monitored parameter. The records should also include monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods.

- During the inspection, a representative sample of documents were reviewed. The facility did have the documentation of the 15 minute readings and the daily block averages for opacity, 30-day rolling averages of steam load, and 30-day rolling averages of O₂%.

Per 63.10(b)(2)(i) and (vi), 63.10(c)(5)-(8) and (12), and 63.7555(d)(6) and (7), the facility is required to maintain the following records:

- Records of the occurrence and duration of each malfunction of the boilers, or of the associated air pollution control and monitoring equipment.
- Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.7500(a)(3), including corrective actions to restore the malfunctioning boilers, air pollution control, or monitoring equipment to its normal or usual manner of operation.
- The date and time identifying each period during which the CMS was inoperative (except for zero (low-level) and high-level checks) or out of control and the nature of the repairs or adjustments to the CMS that was inoperative or out of control.
- Occurrence and duration of each period of excess emissions and parameter monitoring exceedances that occurs during startups, shutdowns, and malfunctions.
- Occurrence and duration of each period of excess emissions and parameter monitoring exceedances that occurs during periods other than startups, shutdowns, and malfunctions.
 - During the inspection, a representative sample of documents were reviewed. The facility did have the documentation.

Additional Records specific to Boiler MACT:

- 63.7555(c) The facility must keep the records required in Table 8 including records of all monitoring data and calculated averages for applicable operating limits, such as opacity, pressure drop, pH, and operating load, to show continuous compliance with each applicable emission limit and operating limit.
- 63.7555(d)(1) The facility must keep records of monthly fuel use by the boiler, including the type(s) of fuel and amount(s) used.
- 63.7555(d)(3) The facility must keep records of all calculations and supporting documentation of HCl emission rates, using Equation 16 of 63.7530, that were done to demonstrate compliance with the HCl limit. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum chlorine fuel input or HCl emission rates.
- 63.7555(d)(4) The facility must keep records of all calculations and supporting documentation of Hg emission rates, using Equation 17 of 63.7530, that were done to demonstrate compliance with the Hg limit. Supporting documentation should include results of any fuel analyses and basis for the estimates of maximum Hg fuel input or Hg emission rates.

- 63.7555(d)(5) If, consistent with §63.7515(b), the facility chooses to stack test less frequently than annually, the facility must keep a record that documents that the emissions in the previous stack test(s) were less than 75 percent of the applicable emission limit (or, in specific instances noted in Table 1, less than the applicable emission limit), and document that there was no change in source operations including fuel composition and operation of air pollution control equipment that would cause emissions of the relevant pollutant to increase within the past year.
- 63.7555(d)(9) The facility must maintain records of the calendar date, time, occurrence and duration of each startup and shutdown.
- 63.7555(d)(10) The facility must maintain records of the type(s) and amount(s) of fuels used during each startup and shutdown.
- 63.7555(h) If the facility uses an alternative fuel other than natural gas, refinery gas, gaseous fuel subject to another subpart under this part, other gas 1 fuel, or gaseous fuel subject to another subpart of this part or part 60, 61, or 65, the facility must keep records of the total hours per calendar year that alternative fuel is burned and the total hours per calendar year that the unit operated during periods of gas curtailment or gas supply interruption.
 - During the inspection, a representative sample of documents were reviewed. The facility monitored and recorded the required CO and O₂ concentrations and calculated 15-minute and 1-hour average CO concentrations at 3% O₂. The facility did calculate the 720-hour averages required to determine compliance with the 30-day rolling average CO limit.
 - The facility chooses to rely on paragraph (1) of the definition of "startup" in 63.7575.
- 63.7560 – Per 63.7560(a)-(c), the facility did maintain their records in a form suitable and readily available for expeditious review, including each record for 5 years (At least 2 years on-site and offsite for remaining 3 years) following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

NESHAP, Subpart ZZZZ

This facility is subject to the requirements of 40 CFR 63, National Emission Standards for Hazardous Air Pollutants, Subparts A, Subpart S, Subpart MM, and Subpart ZZZZ.

40 CFR 63 Subpart S

In accordance with §63.443(a), the facility controls low volume, high concentration (LVHC) and high volume, low concentration (HVLC) gas emissions from the following affected sources:

LVHC

- Batch Digester System
- Turpentine Recovery System
- Evaporator System
- Condensate Steam Stripper

HVLC

- Pulp Washing
- O2 Delignification
- Knotting and Screening System

In accordance with §63.443(c), equipment systems listed in paragraphs (a) and (b) of this section shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section.

LVHC gases from the digester system, turpentine system, evaporator system, and condensate stripper system are collected in a closed vent system and routed to the No. 1 and No. 2 Combination Boilers. HAP emissions are introduced with the primary fuel or into the flame zone when using No. 1 or No. 2 Power Boiler. A continuous monitoring system (CMS) is not required.

The facility has installed continuous flow meters on each bypass. The system bypass has a flow indicator that does take periodic readings every 15 minutes.

In accordance with §63.443(e), periods of excess emissions reported under §63.455 shall not be a violation of §63.443(c) and (d) provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed the following levels:

- One percent for control devices used to reduce the total HAP emissions from the LVHC system
- Four percent for control devices used to reduce the total HAP emissions from the HVLC system
- Four percent for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems

According to the most recent semiannual report received by the Department on January 27, 2021, excess emissions were reported for both the LVHC and HVLC systems. However, the excess emissions did not exceed the LVHC/HVLC threshold to constitute a violation.

In accordance with §63.445(b), the equipment at each bleaching stage of the bleaching systems listed in paragraph (a) of this section shall be enclosed and vented into a closed vent system and routed to a control device that meets the requirements specified in paragraph (c) of this section

The bleaching system was permanently retired from service on September 5, 2020. The facility was required to maintain compliance with the requirements of 63.445(b) up until this date and records prior to this date can be reviewed for compliance. Emissions from the Bleach Plant were collected in a closed vent system and treated with a scrubber. Chlorine was used as the surrogate for chlorinated HAPs. The Bleach Plant used a CMS to monitor liquid influent (recirculation) flow, scrubber effluent pH, and fan status. The most recent performance test on the Bleach Plant was conducted on September 20, 2016. The scrubber achieved a chlorine outlet concentration < 10 ppmv of chlorine. Measurements are recorded at least once every 15 minutes. The 3-hour average is used to determine compliance.

According to the most recent semiannual report received by the Department on January 27, 2021, no excess emissions or CMS downtime was reported during the bleaching process.

In accordance with §63.446(b), the facility treats pulping condensates from the following equipment systems:

- Continuous Digester System
- Turpentine Recovery System
- Evaporator Systems

The most recent performance test conducted on the Condensate Collection and Treatment System was February 14 -28, 2018. MeOH is used as a surrogate for total HAP.

In accordance with §63.446(c)(3), collect pulping process condensates from equipment systems that in total contain a total HAP mass of 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of oven dried pulp (ODP) for mills that perform bleaching.

A representative sample of records were reviewed, and the facility did collect condensates that contained no less than 11.1 lbs of MeOH/ODTP based on a 15-day rolling average.

In accordance with §63.446(e)(5), mills that do perform bleaching, treat the pulping process condensates to remove 5.1 kilograms or more of total HAP per megagram (10.2 pounds per ton) of ODP.

A representative sample of records were reviewed, and the facility's condensate steam stripper did remove no less than 10.2 lbs of MeOH/ODTP based on a 15-day rolling average.

In accordance with §63.446(g), each control device used to treat pulping process condensates to comply with the requirements specified in paragraphs (e)(3) through (5) of this section, shall not be a violation if time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed 10 percent.

According to the most recent semiannual report received by the Department on January 27, 2021, no excess emissions were reported for the condensate collection and treatment system. No CMS downtime was reported during the Condensate Collection and Treatment process.

In accordance with §63.453(d), as an option to the requirements specified in paragraph (c) of this section, a CMS shall be operated to measure the chlorine outlet concentration of each gas scrubber used to comply with the bleaching system outlet concentration requirement specified in §63.445(c)(2).

The facility has chosen to achieve an outlet concentration of < 10 ppmv of total chlorinated HAP. The facility is monitoring scrubber effluent pH, scrubber liquid Influent flow and fan operational status to meet the requirements of §63.445(c)(2).

In accordance with §63.453(g), a CMS shall be operated to measure condensate feed rate, steam feed rate, and condensate feed temperature for each steam stripper used to comply with §63.446 (e)(4) or (e)(5).

The facility is monitoring condensate feed rate, steam feed rate, and condensate feed temperature at least once every 15 minutes for the steam stripper to ensure that pulping condensates are being treated in order to reduce or destroy total HAPs by at least 92% or more by weight.

According to the CMS calibration guide, condensate feed rate, steam feed rate, and condensate feed temperature are calibrated annually. Condensate feed rate was last calibrated on August 26, 2020. Steam feed rate and condensate feed temperature were last calibrated on August 26, 2020.

In accordance with §63.453(k), each enclosure and closed-vent system used to comply with §63.450(a) shall comply with the requirements specified in paragraphs (k)(1) through (k)(6) of this section.

(1) Records demonstrated that for each enclosure opening, a visual inspection of the closure mechanism specified in §63.450(b) shall be performed once every 30 days.

(2) Records demonstrated that the closed-vent system as specified by §63.450(a) is visually inspected every 30 days.

(3) LDAR records demonstrated that positive pressure closed-vent systems as specified in §63.450(c) showed no detectable leaks. The inspection report conducted May 2019 showed that the closed vent systems are tested annually using Method 21.

(4) LDAR records demonstrated that enclosure openings as specified in §63.457(e) are tested annually using pressure transmitters and/ or smoke tubes to verify that that each enclosure opening maintains negative pressure. Results are noted in the May 2019 inspection report.

(5) Records demonstrated that manual valves as specified in §63.450(d)(2) are inspected every 30 days to ensure that the valves are maintained in a closed position and the emission point gas stream is not diverted through the bypass line.

(6) Records demonstrated that corrective action is initiated within five (5) days of identifying visible defects in ductwork, piping, enclosures or connections to covers, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure.

The facility did provide a representative sample of documentation to demonstrate compliance with the above requirement.

In accordance with §63.454(a), the owner or operator of each affected source subject to the requirements of this subpart shall comply with the recordkeeping requirements of §63.10, as shown in Table 1 of this subpart, and the requirements specified in paragraphs (b) through (g) of this section for the monitoring parameters specified in §63.453.

Records did demonstrate that the facility is in compliance with the recordkeeping requirements of §63.10. The facility is not required to maintain a start-up, shutdown, and malfunction (SSM) plan. The facility submits excess emissions and continuous monitoring system performance reports on a semiannual basis. The most recent semiannual report was received by the Department on January 27, 2021.

In accordance with §63.454(b), for each applicable enclosure opening, closed vent system, and closed collection system, a site specific inspection plan including a drawing or schematic of the components of the effected equipment shall be maintained.

The facility is maintaining a site specific inspection plan that includes a schematic of the components of the affected source(s). The plan does included information as specified in §63.454(b)(1)-(12). The plan was last revised from September 2019 to February 2021.

In accordance with §63.454(g), the owner or operator must maintain the records of malfunctions

Records did demonstrate the occurrence and duration of each malfunction of operation (i.e. process equipment) of the air pollution control and monitoring equipment.

40 CFR 63 Subpart MM

In accordance with §63.860, the requirements of this subpart apply to the following affected sources:

- No. 2 Recovery Boiler
- No. 3 Recovery Boiler
- No. 2 and No. 3 Smelt Dissolving Tank Vent
- No. 2 Lime Kiln

In accordance with §63.864(d), the owner or operator of each affected kraft or soda recovery furnace or lime kiln equipped with an ESP must install, calibrate, maintain, and operate a continuous opacity monitoring system (COMS) according to the provisions of §63.6(h) and §63.8 and paragraphs (d)(1)-(d)4 of this section.

The recovery boilers and lime kiln are equipped with a COMS. Each completes 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. A QA/QC program for the COMS was available for review during the inspection. Opacity audits are done on a quarterly basis. The most recent opacity audit was conducted on the No. 2 Lime Kiln on February 4, 2021. The most recent opacity audit for the No. 2 and No. 3 Recovery Boilers was conducted on February 3, 2021. The facility also performs daily calibration checks on all COMS. The QA/QC plan is currently being revised.

No. 2 Recovery Boiler: Opacity = 2.13% 10 consecutive 6 min avg. = 2%

No. 3 Recovery Boiler: Opacity = 15.63% 10 consecutive 6 min avg. = 15.87%

No. 2 Lime Kiln: Opacity = 2.13% 10 consecutive 6 min avg. = 2%

In accordance with §63.864(e), the owner or operator of each affected source or process unit using a continuous parameter monitoring system (CPMS) must meet the requirements in paragraphs (e)(1)-(e)(14) of this section.

The No. 2 and No. 3 Smelt Dissolving Tank Vent is equipped with a CPMS that records the pressure drop across the scrubber and the liquid flow rate at least once every successive 15-minute period. According to the CMS calibration guide, the pressure differential gauge and the liquid flow meter are calibrated semiannually. These CPMS were last calibrated on November 15, 2020 and November 20, 2020.

Operating Parameters	Operating Limits	Instantaneous	3- hour Average
Differential Pressure	>1.5 in. of w.c.	4.3 in. of w.c.	4.215 in of w.c.
Liquid Flow Rate	>65 gpm	81 gpm	81.312 gpm

In accordance with §63.864(k)(2), following the compliance date, owners or operators of all affected sources or process units are in violation of the standards of §63.862 if the monitoring exceedances in paragraphs (k)(2)(i) through (vii) of this section occur:

The most recent semiannual reports were received by the Department on July 30, 2020 and January 27, 2021. No violation of standards §63.864(k)(2)(i)-(ii) were observed for the recovery boilers or lime kiln. The semiannual reports received also demonstrated that no violation of standard §63.864(k)(2)(iii) was observed at the smelt dissolving tank vent.

In accordance with §63.866(b), the owner or operator of an affected source or process unit must maintain records of any occurrence when corrective action is required under §63.864(k)(1), and when a violation is noted under §63.864(k)(2).

The facility did provide a representative sample of documentation to demonstrate compliance with the above requirement.

In accordance with §63.866(c), and in addition to the general records required by §63.10(b)(2), the owner or operator must maintain records of the information in paragraphs (c)(1) through (7) of this section.

The facility maintains records of the following information:

- Records of black liquor firing rates in tons/day
- Records of CaO production in tons/day
- Records of monitoring data as specified in §63.864
- Records and documentation of supporting calculations for compliance determinations under §63.865
- Record of parameter limits established for each affected source or process unit
- Records of performance tests

The facility did provide a representative sample of documentation to demonstrate compliance with the above requirement.

In accordance with §63.867(b)(3)(iv), the facility is required to notify the Department if the black liquor solids firing rate for any kraft or soda recovery furnace during any 24-hour averaging period is

increased by more than 10 percent above the level measured during the most recent performance test.

The most recent performance test for both recovery boilers was conducted on April 28-29, 2020. Recovery Furnace No. 3 fired an average rate of 314.6 gpm of black liquor solids and Recovery Furnace No. 2 fired an average rate of 191.4 gpm of black liquor solids. Records did demonstrate that the facility did not have any exceedances of the established rates.

In accordance with §63.867(c), the owner or operator must submit semiannual excess emissions reports containing information specified in paragraphs (c)(1) through (5) of this section.

The facility submitted required excess emissions and CMS performance reports. The most recent report was received by the Department on January 27, 2021.

Conclusions:

Based on the above information, the facility was found to be allegedly operating in violation of permit condition C.56. The matter is being forwarded to BAQ Enforcement Section for resolution.