

VERMONT AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
Air Pollution Control Division

**TECHNICAL SUPPORT DOCUMENT**

**FOR**

**TITLE V PERMIT TO OPERATE**

**#OP-10-008**

Permit Date: May 13, 2011

**Putney Paper Company – Putney, VT**

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Air Pollution Control Division

*This Technical Support Document details the Agency of Natural Resources, Department of Environmental Conservation, Air Pollution Control Division review for the Air Pollution Control Permit to Construct and is intended to provide additional technical information, discussion and clarification in support of the Permit. It is not intended to provide a comprehensive review of the Facility or permit process or duplicate the information contained in the Permit.*

**Facility:**  
Putney Paper Company, Inc.  
Paper Manufacturing  
P.O. Box 226  
Putney, VT 05346

**Facility / Applicant Contact Person:**  
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## 1.0 INTRODUCTION

Putney Paper Company (hereinafter "Permittee") owns and operates the tissue paper manufacturing facility (also referred to herein as "Facility") located off Route 5 and Mill Street, in the town of Putney, Vermont. The Facility is a 100% recycled deink facility with a primary function of manufacturing tissue and other various grades of disposable papers.

Administrative Milestones:

<b>Table 1-1: Administrative Summary</b>	
<b>Administrative Item</b>	<b>Result or Date</b>
Date Application Received:	04/09/2010
Date Administratively Complete:	04/13/2010
Date & Location Receipt of Application Noticed:	4/22/2010 <i>The Brattleboro Reformer</i>
Date Technically Complete:	04/13/2010
Date Draft Decision:	1/27/2011
Date & Location Draft Decision/Comment Period Noticed:	1/27/2011 <i>The Brattleboro Reformer</i>
Date & Location Public Meeting Noticed:	None requested
Date & Location of Public Meeting:	None requested
Deadline for Public Comments:	02/28/2011
Date Proposed Decision:	03/28/2011
Classification of Source Under '5-401:	§5-401(6)(a)(ii): Fuel burning installations
Classification of Application:	Title V Subject Source
New Source Review Designation of Source:	Major Stationary Source
Facility SIC Code(s):	2621 & 2627
Facility SIC Code Description(s):	Paper Mills Sanitary Paper Products

The allowable emissions for the Facility are summarized below:

<b>Table 1-2: Allowable Air Contaminant Emissions (tons/year)<sup>1</sup></b>						
<b>PM/PM10</b>	<b>SO2</b>	<b>NOx</b>	<b>CO</b>	<b>VOC</b>	<b>Total HAPs<sup>2</sup></b>	<b>CO<sub>2</sub>e<sup>3</sup></b>
55	361	84	6	26	<1	28,655

<sup>1</sup> PM/PM10 - particulate matter, SO2 - sulfur dioxide, NOx - oxides of nitrogen, CO - carbon monoxide, HAPs - hazardous air pollutants.

<sup>2</sup> Emissions of individual HAPs each < 10 tpy and emissions of total HAPs combined <25 tpy. Actual total combined HAPs estimated at <1 tpy.

<sup>3</sup> CO<sub>2</sub>e - Carbon dioxide equivalent emissions. Includes where appropriate carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), sulfur hexafluoride (SF<sub>6</sub>), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and other fluorinated greenhouse gases. See Section 3.3 for further details.

## 2.0 FACILITY DESCRIPTION AND LOCATION

### 2.1 Facility Locations and Surrounding Area

The Facility is located in the town of Putney, Vermont. The area surrounding the Facility is primarily mixed commercial and residential. The Facility is located within a mile of the Putney Central School. The Facility is located within 100 kilometers of the Lye Brook Wilderness area in Manchester, Vermont and greater than 100 kilometers from the Great Gulf and Dry River Wilderness areas in New Hampshire.

### 2.2 Facility Description

The operations performed at the Facility are described using the Standard Industrial Classification Codes - 2621 (Paper Mills) and 2627 (Sanitary Paper Products).

The regulated sources of air contaminant emissions at the Facility are listed in Table 2-1.

<b>TABLE 2-1: Equipment and Stack Information</b>					
<b>DESCRIPTION AND MODEL NUMBER</b>	<b>SIZE OR CAPACITY (MAX. ALLOWED)</b>	<b>FUEL TYPE(S) OR PROCESS INPUT</b>	<b>DATE INSTALLED</b>	<b>POLLUTION CONTROL EQUIPMENT</b>	<b>STACK HEIGHT (FT Above Grade)</b>
Boiler #1 Cleaver Brooks Model 655-600	25 MMBTU/hr 600 hp	No. 6 Fuel Oil	1967	none	60
Boiler #2 Cleaver Brooks Model 655-600	25 MMBTU/hr 600 hp	No. 6 Fuel Oil	Before 7/1/1979	none	60

Putney Paper's Facility is a 100% recycled deink facility with a primary function of manufacturing tissue and other various grades of disposable papers. Within this primary function there exist five (5) individual processes: repulping, deinking and

cleaning, formation, drying and wastewater treatment. The manufacturing facility operates twenty-four (24) hours per day, seven (7) days per week and produces approximately 110 tons per day of finished paper products.

### **2.3 Description of Compliance Monitoring Devices**

This Facility is not equipped with devices to continuously monitor the emission of air contaminants to the ambient air.

### **2.4 Proposed Modifications to Facility**

The Permittee has not proposed to modify the Facility.

### **2.5 Identification of Sources with Insignificant or Negligible Emissions**

Activities which qualify as an "insignificant activity" pursuant to §5-1002(h) of the *Regulations* need not be considered when determining the applicability of Subchapter X of the *Regulations* and must only be listed as such within the operating permit application. Additionally, guidance provided by the U.S. EPA (entitled "White Paper for Streamlined Development of Part 70 Permit Applications") lists activities which are considered as "trivial" sources of air contaminants, and may be presumptively omitted from operating permit applications. Although not required for determining applicability with Subchapter X, quantifiable emissions from "insignificant activities" must be included for the purposes of establishing whether or not a source is subject to other air pollution control requirements, including, but not limited to: reasonably available control technology, major source status, and Title V operating permit applicability.

In its application, the Permittee has not identified any equipment or activities as insignificant or trivial. However, the Agency is aware of the following insignificant or trivial activities at the site:

1. Propane fueled forklifts;
2. Repair and maintenance shop activities;
3. Soldering and welding equipment;
4. Ventilating units used for human comfort;
5. Fuel oil storage tanks;
6. Paper testing laboratory;
7. Diesel fire pump (Cummins 6BTA - 5.9l); and
8. Intermittent building maintenance activities.

In the past the Facility also had a propane electrical generator set (65 kW) manufactured by Onan, but this unit has been removed from the site.

Emissions were not quantified from the above insignificant activities because they are considered negligible or not quantifiable. The exclusion of emissions produced by the insignificant and trivial activities does not alter the applicability status of the Facility under Subchapter X of the *Regulations*.

### 3.0 QUANTIFICATION OF POLLUTANTS

The quantification of emissions from a stationary source is necessary in order to establish the regulatory review process necessary for the operating permit application and to determine applicability with various air pollution control requirements. These determinations are normally based upon allowable emissions. Allowable emission is defined as the emission rate calculated using the maximum rated capacity of the source and, if applicable, either: (a) the applicable emission standard contained in the *Regulations*, if any, or (b) the emission rate or design, operational or equipment standard specified in any order or agreement issued under the *Regulations* that is state and federally enforceable. An applicant may impose in its application an emission rate or design, or an operational or equipment limitation which may be incorporated in the Permit to restrict operation to a lower level. Such limitations may include fuel restrictions or production limits.

#### 3.1 Estimating Potential Emission of Criteria Pollutants from the Existing Stationary Source

<b>Table 3-1: Oil Fired Boilers - Allowable Emissions</b>				
Total Fuel input Both Boilers: 2,300,000 gallons/yr No.6 Fuel Oil with 2% sulfur content				
	Emission Factor			Allowable Emissions
	Factor	Units <sup>2</sup>	Source	tons per year
SO <sub>2</sub>	157S <sup>1</sup>	lb/1000 gal	AP-42, Fuel Oil Combustion, Table 1.3-1 (9/98)	361
NO <sub>x</sub>	72.74 <sup>3</sup>			83.6
PM	0.32	lb/MMBtu	§5-231(3)(a)(ii) of the <i>Regulations</i>	55.2
CO	5	lb/1000 gal	AP-42, Fuel Oil Combustion, Table 1.3-1 (9/98)	5.8
VOC	0.28		AP-42, Fuel Oil Combustion, Table 1.3-3 (9/98)	0.3
HAPs	0.0155		AP-42, Fuel Oil Combustion, Tables 1.3-8 to 1.3-10 (9/98)	0.18

<sup>1</sup> S represents the weight % of sulfur in the oil. For example if the fuel is 2.0% sulfur, then S=2.0

<sup>2</sup> lb/1000 gal: pounds of pollutant emitted per 1000 gallons of fuel input to the boiler.

<sup>3</sup> The NO<sub>x</sub> emission factor is based on the following empirical relationship: lb NO<sub>2</sub>/10<sup>3</sup> gal = 20.54 + 104.39(N), where N is the weight % of nitrogen in the oil. The above factor assumes a weight % of 0.5.

<b>Table 3-2: Summary of Allowable Air Contaminant Emissions by Source (tons/year)</b>						
Source	PM/PM10	SO2	NOx	CO	VOC	Total HAPs
Boilers	55.2	361.1	83.7	5.8	0.3	0.18
Paper Production	---	---	---	---	25.7	<0.01
<b>Facility Totals</b>	<b>55.2</b>	<b>361.1</b>	<b>83.7</b>	<b>5.8</b>	<b>26.0</b>	<b>&lt;0.2</b>

As summarized in Table 3-2 above:

- The Facility has allowable emissions of all air contaminants in the aggregate of ten (10) or more tons per year: the Facility is therefore subject to Subchapter X of the *Regulations* and is designated as a Subchapter X Major Source.
- The Facility does not have changes in the allowable emissions of any contaminant which would classify the source as a "Major Source" and therefore is not subject to the new source review requirements of §5-502 of the *Regulations*.
- The Facility does have allowable emissions of SO<sub>2</sub> which classifies the source as a "Title V Subject Source" and therefore is subject to the federal operating permit requirements of 40 C.F.R. Part 70 or 71.

### 3.2 Estimating Actual Emissions of Hazardous Air Contaminants from the Existing Stationary Source.

Based on the facility's annual registration information for the reporting years 2006, 2007, and 2009, the following table summarizes the estimated actual emission rate of HACs from the Facility. The emission estimates shown below assume 100% discharge to the ambient air of the ingredients included in the products used by the Facility that contain dipropylene glycol methyl ether and 1,2-propanediol. To be conservative, for each HAC emitted, the year with the highest emission rate was used in this evaluation.

Table 3-3 Quantification of HAC Emissions				
Hazardous Air Contaminant	CAS#	Toxic Category	Emission Rate (lb/8-hrs) <sup>1</sup>	Action Level (lb/8-hrs)
Dipropylene glycol methyl ether	34590-94-8	II	3.2	120
1,2-Propanediol	57-55-6	II	0.39	5.8

<sup>1</sup> For category III contaminants, emission rate is based on 2000 hours/year of operation. For category I & II contaminants, the emission rate is based on 8760 hours/year.

<b>Section 3.3 Estimation of CO<sub>2</sub>e Emissions</b>						
Facility: Putney Paper Company		Permit #: OP-10-008				

**Table 1. Stationary Source Fuel Combustion**

Source ID	Source Description	Fuel Combusted	Allowable fuel usage	Units	Estimated wood usage	Estimated %MC for raw wood fuel
					(raw tons)	
	oil fired boilers	Residual Fuel Oil #6	2,300,000	gallons	0	10.0%
			0		0	0.0%

**Table 2. Total Company-Wide Stationary Source Fuel Combustion**

Fuel Type	Quantity Combusted	Units
Distillate Fuel Oil #2	0	gallons
Residual Fuel Oil #6	2,300,000	gallons
Propane	0	gallons

**Table 3. Total Company-wide CO<sub>2</sub>, CH<sub>4</sub> and N<sub>2</sub>O Emissions from Stationary Source Fuel Combustion**

Fuel Type	CO <sub>2</sub> (kg)	CO <sub>2</sub> (lb)	CH <sub>4</sub> (kg)	CH <sub>4</sub> (lb)	N <sub>2</sub> O (kg)	N <sub>2</sub> O (lb)
Distillate Fuel Oil #2	0	0	0.0	0.0	0.0	0.0
Residual Fuel Oil #6	25,909,500	57,120,602	1,035.0	2,281.8	207.0	456.4
Propane	0	0	0.0	0.0	0.0	0.0
<b>Total Fossil Fuel Emissions</b>	<b>25,909,500</b>	<b>57,120,602</b>	<b>1,035.0</b>	<b>2,281.8</b>	<b>207.0</b>	<b>456.4</b>
<b>Total Non-Fossil Fuel Emissions</b>	<b>0</b>	<b>0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>
<b>Total Emissions for all Fuels</b>	<b>25,909,500</b>	<b>57,120,602</b>	<b>1,035.0</b>	<b>2,281.8</b>	<b>207.0</b>	<b>456.4</b>

  

Global Warming Potential	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e	
	1.0	21.0	310.0	metric ton	short ton
<b>Total CO<sub>2</sub> Emissions - Equivalent (Fossil CO<sub>2</sub>e + Biogenic CH<sub>4</sub> &amp; N<sub>2</sub>O)</b>				<b>25,995.4</b>	<b>28,655.0</b>
<b>All CO<sub>2</sub>e emissions at stack (Fossil CO<sub>2</sub>e + Biogenic CO<sub>2</sub>e) - for APCD Permit i</b>				<b>25,995.4</b>	<b>28,655.0</b>

#### 4.0 DISCUSSION OF SELECT APPLICABLE AND NON-APPLICABLE REQUIREMENTS

The Agency will assess compliance with these regulations during any inspections of the Facility. The inspections will include confirmation of the proper operation and maintenance of equipment and air pollution control devices, visual observations of emission points, and review of any records required by the Permit.

##### 4.1 Vermont Air Pollution Control Regulations and Statutes

**§5-201 and §5-202 - Open Burning Prohibited and Permissible Open Burning.** Open burning of materials is regulated within these requirements.

**§5-211(1) - Prohibition of Visible Air Contaminants - Installations Constructed Prior to April 30, 1970.** This standard applies one of the boilers manufactured by Cleaver Brooks (Boiler #1) which was installed in 1967, and specifies that visible air contaminant emissions may not exceed forty (40) % opacity for a period of six (6) minutes or more in any hour, and at no time may they exceed sixty (60) % opacity. Compliance with this standard is generally based upon the procedures contained in proposed Reference Method F-1 (51 Federal Register, page 31076, August 29, 1986).

**§5-211(2) - Prohibition of Visible Air Contaminants - Installations Constructed Subsequent to April 30, 1970.** This standard applies to the second boiler manufactured by Cleaver Brooks, the emergency generator set, and diesel fire pump. The limitations of this section specify that visible air contaminant emissions may not exceed twenty (20) % opacity for a period of six (6) minutes or more in any hour, and at no time may they exceed sixty (60) % opacity.

**§5-221(1)(a) - Prohibition of Potentially Polluting Materials in Fuel - Sulfur Limitation in Fuel.** This subsection prohibits the use of any fuel, in stationary fuel burning equipment, with a sulfur content more than 2.0% by weight. This prohibition applies to all stationary fuel burning equipment used on-site. Compliance with this standard is based on fuel analyses following the procedures prescribed by the American Society for Testing and Materials ("ASTM").

Putney Paper has stated that it complies with this standard based on their contract with fuel suppliers.

The continued use of these methods is sufficient to ensure compliance with this limitation in the future. As part of a compliance inspection, the Agency may require Putney Paper to perform oil sampling and analyses to confirm compliance with the 2.0% limit.

**§5-231(3)(a)(i) - Prohibition of PM; Combustion Contaminants.** This standard applies to any fossil fuel burning equipment with a rated heat input of ten (10) MMBTU/hr or less. Specifically, this standard applies to the small stationary propane-fired emergency generator and the diesel fire pump identified in item 2.5

of this document. This standard specifies that PM emissions may not exceed 0.5 lbs/hr/MMBTU of heat input. Compliance with this standard is generally based on the use of Reference Method 5 (40 CFR Part 60, Appendix A).

**§5-231(3)(a)(ii) - Prohibition of PM; Combustion Contaminants.** The PM standard in this section is applicable to the two No. 6 oil-fired boilers manufactured by Cleaver Brooks, since they each have a heat input rating greater than ten (10) MMBTU/hr but equal to or less than 250 MMBTU/hr. The PM standard is in units of lbs/hr/MMBTU and varies based upon the heat input of the unit. The actual value of the standard is derived based upon the following formula:

$$E_{PM} = 10^{[-0.47039(\log_{10} HI) + 0.16936]}$$

where:

- $E_{PM}$  - is the *particulate matter emission* limit, expressed to the nearest hundredth pound per hour per million BTU's; and
- HI - is the *heat input* in millions of BTU's per hour.

For each of the Facility's boilers when firing oil:

$$E_{PM} = 10^{[-0.47039(\log_{10} 25) + 0.16936]}$$

$$E_{PM} = 0.32 \text{ lb/MMBtu}$$

<b>Table 4-1: Equipment Subject to §5-231(3)</b>			
<b>Equipment ID</b>	<b>Size/Capacity (MMBtu/hr)</b>	<b>Emission Standard, (lbs/MMBtu)</b>	<b>Allowable Emissions, (lbs/hr)</b>
Boiler #1	25	0.32	8.0
Boiler #2	25	0.32	8.0

In an effort to maintain compliance with this requirement the Agency will require Putney Paper to maintain and operate its equipment following the manufacturer's recommendations, and that Putney Paper perform annual maintenance tune-ups on its equipment. The Agency is also requiring the facility to routinely monitor the combustion efficiency of the boilers. The Agency will also assess visible emissions from the fuel burning equipment while on-site performing an inspection of the Facility, and if visible emissions are observed to be in excess of the limits specified in §5-211 of the *Regulations*, the Agency may require the performance of a stack test to verify compliance with the above referenced PM standards or that other corrective measures be taken.

Putney Paper has stated that it complies with the standard based on their emission estimates, emission performance data from Cleaver-Brooks, the boiler manufacturer, and the scheduled maintenance of the boilers.

Compliance with the standard in §5-231(3)(a)(ii) of the *Regulations* is generally based on the use of Reference Method 5 (40 CFR Part 60, Appendix A). Based on available emission data, emission performance data from the boiler manufacturer, and fuel properties, the estimated PM emissions from the boilers at the Facility are anticipated to be well below the regulatory limit thereby ensuring compliance with the standard. Therefore the Agency is not, at this time, requiring emissions testing for the boilers.

**§5-241(1) & (2) - Prohibition of Nuisance and Odor.** This requirement applies to the entire Facility and prohibits the discharge of air contaminants that would be a nuisance to the public or be source of objectionable odors beyond the property-line of the Facility.

Putney Paper has stated that it complies with this requirement due to their observation of dust and odors from the operations.

The Agency will verify compliance with this requirement in the future during any inspections of the Facility. Additionally, the Agency investigates all complaints that it receives in order to determine whether or not there is a violation of this requirement.

**§5-253.14 - Control of Volatile Organic Compounds - Solvent Metal Cleaning.** This subsection applies to all cold cleaning operations, open-top vapor degreasing operations with an open area of 10.8 square feet or greater, and conveyORIZED degreasing operations with an air/solvent interface 21.5 square feet or greater. The cold cleaning standards require the units to be designed and equipped with a cover easily operated with one hand if the vapor pressure of the solvent exceeds 0.3 psi and an internal drainage area and additional control measures if the vapor pressure of the solvent exceeds 0.6 psi. All cold cleaning operations regardless of solvent vapor pressure must...

"...(iv) Provide a permanent, legible, conspicuous label, summarizing the operating requirements;  
(v) Store waste solvent in covered containers;  
(vi) Close the cover whenever parts are not being handled in the cleaner;  
(vii) Drain the cleaned parts until dripping ceases;  
(viii) Supply a solvent spray, if used, that ensures a solid fluid stream at a pressure that does not exceed 10 pounds per square inch gauge;  
(ix) Degrease only materials that are neither porous nor absorbent; and  
(x) Cease operation of the unit upon the detection of any visible solvent leak until such solvent leak is repaired."

**§5-403 - Circumvention.** "No Person shall build, erect, install or use any article, machine, equipment or other contrivances, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which otherwise would constitute a violation of these regulations."

**Subchapter VIII - Registration of Air Contaminant Source.** This Subchapter requires the owner or operator of a stationary source register with the Agency if the source produces five (5) tons per year or greater of actual emissions during the preceding calendar year. The owner or operator of a source is required to submit information regarding their operations and pay a fee based upon the quantity of emissions they produce and the fuels that they use at the source.

#### 4.2 Federal Air Pollution Control Regulations and the Clean Air Act

##### **Section 111 of the Clean Air Act - New Source Performance Standards (NSPS)**

No promulgated NSPS in 40 *CFR* Part 60 currently apply to Putney Paper.

##### **Section 112 of the Clean Air Act - National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

The Pulp and Paper Production MACT in 40 *CFR* Part 63 Subpart S applies to pulp and paper facilities that are major HAP sources. Based upon its estimated emissions of HAPs regulated by the U.S. EPA, Putney Paper does not generate HAP emissions in excess of the federal thresholds for a major source. Consequently, the pulp and paperboard industry NESHAP does not apply to Putney Paper.

##### **40 C.F.R. Part 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers – area sources.**

This regulation applies to the oil fired boilers. Since the boilers are considered existing boiler under this regulation, they are subject to the work practice standards as well as notification, reporting and recordkeeping requirements established in this rule. The work practice standards include biennial tune-ups and a one-time energy assessment.

**40 C.F.R. Part 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines.** Applies to new engines installed after June 12, 2006 at area sources of HAPs. Requires such engines to meet the emission standards of NSPS Subpart IIII and JJJJ, imposes ULSD fuel limitations, and imposes maintenance requirements. Separate provisions of ZZZZ also apply to existing engines installed prior to June 12, 2006.

Subpart ZZZZ applies to the diesel engine fire pump at the Facility.

**40 CFR Part 64 - Compliance Assurance Monitoring.** Pursuant to requirements concerning enhanced monitoring and compliance certification under the *Clean Air Act* ("CAA"), EPA promulgated new regulations and revised regulations on October 22, 1997. These new requirements implemented

compliance assurance monitoring ("CAM") for major stationary sources of air pollution that are required to obtain operating permits under Title V of the CAA.

§64.2 in 40 *CFR* Part 64 specifies that each pollutant specific emission units (PSEU) at a facility that meets a three-part test is subject to the requirements for CAM. An emission unit must:

- (A) Be subject to an emission limitation or standard,
- (B) Use a control device to achieve compliance, and
- (C) Have **pre-control** emissions that exceed or are equivalent to the major source threshold in 40 *CFR* Part 70 (i.e., 10 tpy individual HAP, 25 tpy total HAPs, 50 tpy VOCs, or 100 tpy for any other air contaminant).

Since Putney Paper does not meet the above three part test for its boilers and paper manufacturing operations, it is not subject to the requirements for CAM.

#### **4.3 Non-Applicable Requirements for Which a Permit Shield Provision Has Been Requested**

The Facility has not requested a permit shield from any specific, potentially applicable requirement. Accordingly, the Agency has not granted any permit shields for the Facility.

#### **5.0 CONTROL TECHNOLOGY REVIEW FOR MAJOR SOURCES AND MAJOR MODIFICATIONS**

The Facility is not undergoing changes subject to new source review, therefore this section is not applicable.

#### **6.0 AMBIENT AIR QUALITY IMPACT EVALUATION**

The Facility is not undergoing changes subject to new source review; therefore this section is not applicable.

#### **7.0 HAZARDOUS AIR CONTAMINANTS**

The emissions of hazardous air contaminants ("HACs") are regulated under to §5-261 of the Regulations. The Owner/Operator of a source must quantify its emissions of HACs regulated by this rule. Any Facility whose emission rate of a HAC exceeds its respective Action Level ("AL") is subject to the rule for the HAC, and the Owner/Operator must then demonstrate that the emissions of the HAC are minimized to the greatest extent practicable by achieving the Hazardous Most Stringent Emission Rate ("HMSE") for that HAC.

Solid fuel burning equipment (not including incinerators) installed or constructed prior to January 1, 1993, and all fuel burning equipment which combusts virgin liquid or gaseous fuel is exempted from review pursuant to §5-261(1)(b)(ii) of the *Regulations*. Consequently, no fuel burning equipment used at the Facility qualified for review of HAC emissions under §5-261 of the *Regulations*.

The production of tissue paper does result in the discharge of some HACs at the Facility. These emissions have been quantified as part of the Agency's registration program. This data has been compared to the Action Levels in order to determine applicability to §5-261 of the *Regulations*.

Summarized in Table 3-3 are the estimated actual HAC emissions resulting from the paper production process, as well as a comparison to the respective AL. Since the emission rates of these HACs are below their respective ALs, no further review under §5-261 is necessary.

In the Facility's previous permit, there was an HMSER determination for chloroform emissions that resulted from the use of sodium hypochlorite bleach in their pulping process. By the end of 2006, they stopped using sodium hypochlorite in their papermaking processes.

### **8.0 Discussion of Permit Conditions**

*For purposes of clarity, discuss any unique permit conditions and explain what was considered in the development of the condition.*

Condition (7)(b)(i) – This condition indicates that an alternative to an annual oil and filter replacement for the diesel engine would be to follow an oil analysis program. Here are further details (from §63.6625(i)) on what would be required (verbatim from the CFR as amended 8/20/2010):

§63.6625(i) If you own or operate a stationary CI engine that is subject to the work, operation or management practices in items 1 or 2 of Table 2c to this subpart or in items 1 or 4 of Table 2d to this subpart, you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d to this subpart. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.