Attachment – Stack Testing

International Paper Company — Construction Permit No.: 0330042-015-AC
Pensacola Mill — Facility ID No.: 0330042

Required VOC Source Stack Testing

	Stack Testing Frequency	
Source	**Initial**	**Annual**
A-Line O_2 Delignification		
A1 Washer	✓	
A2 Washer	✓	
Cleaner Dilution Tank	✓	
Screen Feed Tank	✓	
Reject Refine Feed Tank	✓	
A1 & A2 Washer Filtrate Tank Vent	✓	✓
A-Line Kamyr Digesters & Brow Stock Washing (BSW)		
Atmospheric Diffusion Washer	✓	
High Density Diffusion Tank	✓	
1st Stage Filtrate Tank	✓	
A-Line Bleach Plant		
#6 High Density Tank	✓	
B-Line O_2 Delignification		
Rejects Drainers Vibratory Hood	✓	
B-Line Decker Washer	✓	
#1 POW Washer	✓	✓
Screen Dilution Tanks	✓	
Refined Rejects Tank	✓	
B-Line O_2 Blow Tank	✓	✓
B-Line No. 1 POW Seal Tank	✓	✓
Brown Stock Decker Seal Tank	✓	✓
B-Line Batch Digesters & Brown Stock Washing (BSW)		
No. 1 & No. 2 Combined Knot Tank	✓	
No. 1 BSW No. 1 Drum	✓	✓
No. 1 BSW No. 2 Drum	✓	✓
No. 2 BSW No. 1 Drum	✓	✓
No. 2 BSW No. 2 Drum	✓	✓
No. 1 BSW Foam Tank	✓	
No. 2 BSW Foam Tank	✓	
# 3 High Density Tank	✓	
B-Line Bleach Plant		
Scrubber	✓	
E/O Tower	✓	

#5 High Density Tank	✓	
E/O Washer Hood Vent	✓	
E/O Seal Tank	✓	✓
LVHC System/Thermal Oxidizer & Paper/Pulp Machines		
Thermal Oxidizer	✓	✓
No. 4 Pulp Machine	✓	
No. 5 Paper Machine	✓	
#4 High Density "Broke" Tank	✓	

Required TRS Source Stack Testing

	Stack Testing Frequency	
Source	**Initial**	**Annual**
A-Line O_2 Delignification		
A1 Washer	✓	✓
A2 Washer	✓	✓
A-Line Kamyr Digesters & Brow Stock Washing (BSW)		
Digester		
Atmospheric Diffusion Washer	✓	
B-Line O_2 Delignification		
B-Line Decker Washer	✓	
Brown Stock Decker Seal Tank	✓	
B-Line Batch Digesters & Brown Stock Washing (BSW)		
Batch Digesters		
No. 1 BSW No. 1 Drum	✓	
No. 1 BSW No. 2 Drum	✓	
No. 2 BSW No. 1 Drum	✓	
No. 2 BSW No. 2 Drum	✓	
No. 1 BSW Foam Tank	✓	
No. 2 BSW Foam Tank	✓	
B-Line Bleach Plant		
Scrubber	✓	
E/O Tower	✓	
E/O Washer Hood Vent	✓	
E/O Seal Tank	✓	
LVHC System/Thermal Oxidizer		
Thermal Oxidizer	✓	✓

Required NO_X, SO_2, CO, SAM, PM/PM_{10} Source Stack Testing

	Stack Testing Frequency	
Source	**Initial**	**Annual**
NO_X & SAM (H_2SO_4) Stack Testing		
Thermal Oxidizer	✓	✓
CO & SO_2 Stack Testing		
Thermal Oxidizer	✓	
PM/PM_{10} Stack Testing		
Thermal Oxidizer	✓	✓
No. 5 Paper Machine	✓	

Notes:

1. If multiple units are identical (i.e. same size, configuration, flow characteristics, and production throughputs) a single stack test may be conducted on one unit to represent all identical units.
2. If after any stack testing it is determined that the emission factors or PSD avoidance calculations need to be modified, the permittee shall submit a new air construction permit application. This requirement includes reactivating equipment not accounted for in this PSD avoidance evaluation.
3. If after testing it is determined that this project actual resulted in a major modification, with respect to PSD, then the requirements of 62-212.400(4) through (12), F.A.C. shall apply to the modification as though construction had not yet commenced, per Rule 62-212.400(12)(c), F.A.C.
4. Alternate test methods or modifications may be made if requested and approved in writing or by State Rule.
5. The above required testing in no way eliminates any previously required stack testing, by Rule or permit. If the above testing overlaps any previously required identical testing requirements, only one stack test is required.
6. For repeated annual testing requirements, reduced testing frequency may be requested, based on sufficient documentation of consistent operation and emission test results, through the Department's air construction permitting process.