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NCG Contingency Plan

This plan fulfills the requirements of rule 62-296.404(3)(a)(3) F. A. C. for International Paper's Pensacola Mill.

For the purposes of this plan, the following definitions apply:

> *Essential Maintenance* – Any unscheduled maintenance arising from equipment failures or breakdowns, any predictive-preventive maintenance necessary to prevent unexpected breakdowns and any regular scheduled maintenance required to preserve in good operating condition the non-condensable gas (NCG) collection system, stripper off gas (SOG) collection system, Thermal Oxidizer or Lime Kiln.
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> *Uncontrolled Total Reduced Sulfur (TRS) Emissions* – Any venting of the combined total of all NCG or SOG gases. Venting of a portion of these gas streams that occurs when the mitigation procedures described below are in effect will not constitute uncontrolled TRS emissions.
>
> *Reportable Venting Incident* – Any uncontrolled TRS emissions of any duration or any mitigated TRS emissions (as described below) greater than two hours in duration or any TRS emissions over the 1% semi-annual allowance provided by 40 CFR 63.443(e)(1).

Total reduced sulfur emissions shall not be vented to the atmosphere at any point connected to or between the emissions unit and the control device except in the event of an emergency that presents a danger to life or property, or during those times when the control device is shut down for essential maintenance.

In the event that reportable venting incident does occur, International Paper shall notify the Florida Department of Environmental Protection (the Department) verbally by the close of the Department's next working day. The owner shall provide the Department with a written report as required by Rule 62-210.700, F.A.C. If the next quarterly report is due to the Department sooner than 30 days after the first day of a reportable venting incident, the report on that incident may be filed with the quarterly reports for the following quarter. All venting of TRS gases is reported in the semi-annual Excess Emissions and CMS Performance Report required by 40 CFR 63 Subpart S

<u>Primary and Backup TRS Control</u>
In order to control the impact of TRS emissions, International Paper has installed both primary and backup systems for the TRS control. The primary control device is the Thermal Oxidizer. The backup control device is the Lime Kiln. The NCG and SOG collection systems automatically route the gases from the Thermal Oxidizer to the Lime Kiln in the event of a failure of the Thermal Oxidizer. When essential maintenance is

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scheduled for the Thermal Oxidizer, the NCG and SOG gases are treated in the Lime Kiln. The Lime Kiln and Thermal Oxidizer shall not be taken offline simultaneously when any NCG or SOG gases are being produced except in the event of an emergency that presents a danger to life or property.

Mitigated TRS Venting

In the event that both control devices are unable to treat NCG and/or SOG gases International Paper will take steps to mitigate TRS emissions by following the guidelines in the Pensacola Mill's NCG Venting Procedure. In the event of localized TRS emissions from an emitting unit normally collected by the NCG or SOG collection systems the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period without initiation of shutdown, or unless specifically authorized by the Department for longer duration.