TABLE 1
CAM APPLICABILITY DETERMINATION FOR WESTROCK CP, LLC – PANAMA CITY MILL

Emission Source	Title V EU ID	Control Equipment	Pollutants with Permitted Emission Limits	Uncontrolled Emission Rates (TPY)						CAM Plan Required? (Yes/No)	Pollutants Requiring CAM	Comments
				SO_2	NO_x	PM/PM_{10}	VOC	TRS	HAPs			
No. 1 Recovery Boiler	001	ESP, two-stage heavy black liquor oxidation system	PM, TRS	--	--	>100	--	>100	--	Yes	TRS	PM emissions are subject to 40 CFR 63, Subpart MM. TRS emissions are subject to CAM requirements, but CEM already in place to satisfy Rule 62-296.404(5), F.A.C.
No. 2 Recovery Boiler	019	ESP, two-stage heavy black liquor oxidation system	PM, TRS	--	--	>100	--	>100	--	Yes	TRS	PM emissions are subject to 40 CFR 63, Subpart MM. TRS emissions are subject to CAM requirements, but CEM already in place to satisfy Rule 62-296.404(5), F.A.C.
No. 3 Combination Boiler	015	Fly Ash Arrestor, Wet Scrubber	PM, SO_2, TRS	>100	--	>100	--	>100	--	Yes	PM, SO_2	PM periodic monitoring required for the scrubber (i.e., liquid flow rate, pressure drop). CEMS already in place for SO_2 emissions. Monitoring of pH is a backup to SO_2 CEMS. No add-on controls for TRS.
No. 4 Combination Boiler	016	Fly Ash Arrestor, Wet Scrubber	PM, SO_2, TRS	>100	--	>100	--	>100	--	Yes	PM, SO_2	PM periodic monitoring required for the scrubber (i.e., liquid flow rate, pressure drop). CEMS already in place for SO_2 emissions. Monitoring of pH is a backup to SO_2 CEMS. No add-on controls for TRS.
No. 1 Smelt Dissolving Tank	021	Venturi Scrubber	PM, TRS	--	--	>100	--	<100	--	No	--	PM emissions are subject to 40 CFR 63, Subpart MM. Uncontrolled TRS emissoin less than 100 TPY.
No. 2 Smelt Dissolving Tank	020	Venturi Scrubber	PM, TRS	--	--	>100	--	<100	--	No	--	PM emissions are subject to 40 CFR 63, Subpart MM. Uncontrolled TRS emissions less than 100 TPY.
Lime Kiln/NCG Collection	004	Venturi Scrubber	NO_x, PM, SO_2, TRS	>100	>100	>100	--	>100	--	Yes	SO_2	PM emissions are subject to 40 CFR 63, Subpart MM. SO_2 periodic monitoring requirements for the scrubber (i.e., liquid flow rate, pH, pressure drop) included in the CAM Plan. No add-on controls for NO_x or TRS.
Multiple Effect Evaporators	026	Lime Kiln/No. 4 Bark Boiler	None	--	--	--	--		--	No	--	No emission limits.
Digester System	027	Lime Kiln/No. 4 Bark Boiler	None	--	--	--	--		--	No	--	No emission limits.
Lime Slaker	005	Wet Cyclonic Scrubber	PM	--	--	>100	--	--	--	Yes	PM	Some monitoring of scrubber parameters (i.e., liquid flow rate) is already required by Specific Condition No. H9 of the Title V Permit.
Woodyard	030	None	None	--	--	--	--	--	--	No	--	No control equipment or emission limits.
Bleach Plant	033	Wet Scrubber	HAPs	--	--	--	--	--	>10	No	--	HAP emissions are subject to 40 CFR 63, Subpart S.
Pulping Systems	034	Lime Kiln/Nos. 3 & 4 Combination Boiler	None	--	--	--	--	>100	--	No	--	No emission limits.
Petcoke Handling and Storage	038	Baghouse	None	--	--	--	--	--	--	No	--	No emission limits.
Emergency Stationary Internal Combustion Engines	--	None	SO_2	--	--	--	--	--	--	No	--	No control equipment. SO_2 emissions limit based on sulfur content of No. 2 fuel oil.

TABLE 2
SUMMARY OF UNCONTROLLED TRS EMISSION RATES FOR SMELT DISSOLVING TANKS
WESTROCK CP, LLC – PANAMA CITY MILL

			Uncontrolled TRS Emissions		
Emission Source	**Title V EU ID**	**Production/ Process Rate**	**Emission Factor**	**Ref.**	**Emission Rate [a] (TPY)**
No. 1 Smelt Dissolving Tank	021	123,700 lb/hr BLS	0.33 lb/ton BLS	1	90.30
No. 2 Smelt Dissolving Tank	020	123,700 lb/hr BLS	0.33 lb/ton BLS	1	88.32

1. Based on AP-42 Table 10.2-1, Emission Factors for Kraft Pulping (9/90). TRS = 0.5 lb/ton ADUP * 1 ton ADUP/1.5 tons BLS = 0.33 lb TRS/ton BLS.

Notes:

ADUP = Air-Dried Unbleached Pulp

BLS = Black Liquor Solids

[a] Based on 8,760 hr/yr operation.