INTERNATIONAL PAPER

PENSACOLA MILL
375 MUSCOGEE ROAD
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Facility ID No. 0330042

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 following equipment:

- Low Volume High Concentration (LVHC) Non-Condensable Gas (NCG) Handling System (EU ID No. 063),
- Digester Systems,
- Multiple Effect Evaporator Systems,
- Condensate Stripper Systems,
- Thermal Oxidizer or,
- Lime Kiln.

Reportable Venting Incident – Any uncontrolled TRS emissions of any duration from the LVHC NCG Handling System.

Total reduced sulfur emissions shall not be vented to the atmosphere from the LVHC NCG Handling System 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 a reportable venting incident does occur, International Paper shall notify the Florida Department of Environmental Protection (the Department) by email before the close of the Department's next working day. This email shall satisfy the requirement to submit a written report under Rule 62-210.700, F.A.C. All venting of TRS gases is also 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 LVHC NCG collection system automatically reroutes the gases from the Thermal Oxidizer to the Lime Kiln in the event of Thermal Oxidizer downtime. The Lime Kiln and Thermal

Oxidizer shall not be taken offline simultaneously when any LVHC NCG gases are being produced by controlled systems except in the event of an emergency that presents a danger to life or property.

Mitigation of TRS Venting

In the event that both control devices are unable to treat LVHC NCG gases, International Paper will take steps to mitigate TRS emissions by slowing back or shutting down TRS emitting units if it is possible to do so without creating a danger to life, property or the environment. The time allowed for venting shall be as short as possible and limited to the time required to affect the required maintenance. In all cases of TRS venting from an emitting unit normally collected by the LVHC NCG collection system, the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration.