Appendix CP- 1- Compliance Plan

X.1. Compliance Schedule. The facility currently operates a 805 MMBtu/hr, carbonaceous fuel and No. 6 fuel oil fired boiler, the No. 5 Power Boiler (EU 006). Carbonaceous fuel is defined, in this case, to consist of bark, wood, sawdust, wastewater wood fiber residuals, and bark ash.

Due to the boiler burning wastewater wood fiber residuals as a fuel source, the boiler is subject to the requirements of 40 CFR Part 61, Subpart E-National Emission Standard for Mercury.

Wastewater wood fiber residuals had been included in the initial Title V Operation Permit, No. 0890003-001-AV as a fuel source, but the applicable NESHAP requirements were not included in the permit or through a construction permitting action.

Because this boiler is an active emissions unit, a Compliance Plan has been incorporated into this Title V Operation Permit Renewal for the facility to obtain the necessary construction permit to incorporate the requirements of the NESHAP. The permittee shall meet the following milestones:

E.U. ID. No.	Milestone	Milestone Date
006	Responsible Official to submit "Certification of Compliance", addressing the No. 5 Power Boiler, indicating what is not in compliance, when non-compliance started, the degree or amount of non-compliance, the duration of non-compliant operations, steps taken to identify and correct non-compliant conditions, and actions (with time table), to correct any current non-compliant conditions and achieve compliance.	No later than 1 month from the date of Final issuance of the Title V Renewal Permit.
006	Facility to submit a complete application, including completed responses to Department requests for additional information, for an air construction permit/PSD Determination.	
006	Initiation of on-site construction and/or installation of emission control equipment or process change authorized by air construction permit	No later than 3 months from the date of issuance of the resulting air construction permit/PSD Determination
006	Completion of on-site construction or installation of emission control equipment or process change authorized by air construction permit	No later than 9 months from the date of issuance of the resulting air construction permit/PSD Determination
006	Compliance Testing conducted and test reports submitted pursuant to requirements of air construction permit	Pursuant to the timeframes established in the air construction permit.

E.U. ID. No.	Milestone	Milestone Date
006	Submittal of Title V Operation Permit Revision for the incorporation of the air construction permit for the No. 5 Power Boiler	At least 90 days prior to expiration of air construction permit, but no later than 180 days after commencement of operation under the air construction permit.
006	Final Compliance	No later than 11 months from the date of issuance of the resulting air construction permit.
006	Responsible Official to submit "Certification of Compliance", addressing the entire facility, indicating what is not in compliance, when non-compliance started, the degree or amount of non-compliance, the duration of non-compliant operations, steps taken to identify and correct non-compliant conditions, and actions (with time table), to correct any current non-compliant conditions and achieve compliance.	No later than 12 months from the date of issuance of the resulting air construction permit