



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

PERMITTEE

Buckeye Florida Limited Partnership
One Buckeye Drive
Perry, FL 32347

Air Permit No. 1230001-046-AC

Issuance Date: May 5, 2014

Expiration Date: August 5, 2016

Authorized Representative:

Mr. Howard A. Drew, General Manager
Buckeye Florida Limited Partnership

Foley Mill

NCG System Improvement Projects –
40 CFR 63 Subpart S Compliance

PROJECT AND LOCATION

The construction permit authorizes the installation and implementation of equipment necessary for improvement of the existing Non-Condensable Gas (NCG) Collection System at the Foley Mill. The proposed work will be conducted at the existing Foley Mill which is categorized under Standard Industrial Classification No. 2611. The facility is located in Taylor County at east of US 19, south of SR 30, southeast of Perry, Florida. UTM Coordinates are: Zone 17, 256.7 km East and 3328.7 km North; Latitude: 30°03'59" North and Longitude: 83°33'12" West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.); and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard,

Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida



Richard S. Rachal III, P.G.
Program Administrator
Waste and Air Resource Management

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Final Air Permit package (including the Final Determination and Final Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested before the close of business on **May 5, 2014**, to the persons listed below.

Mr. Howard, Drew, General Manager, Buckeye Florida, Limited Partnership:

howard.drewjr@gapac.com

Mr. David Weeden, Environmental Program Manager, Buckeye Florida, Limited Partnership:

David.weeden@gapac.com

Mr. David Buff, P.E., Golder Associates, Inc.: dbuff@golder.com

Clerk Stamp

FILING AND ACKNOWLEDGMENT FILED, on this date,
pursuant to Section 120.52(7), F.S., with the designated agency
clerk, receipt of which is hereby acknowledged.



(Clerk) May 5, 2014

SECTION 1. GENERAL INFORMATION

FACILITY AND PROJECT DESCRIPTION

Facility

Buckeye Florida Limited Partnership Foley Mill is a softwood Kraft pulp mill that manufactures bleached market pulps and dissolving cellulose pulps. The dissolving cellulose pulp produced at this plant is used in products such as food casings, rayon industrial cord, acetate fibers and plastics, as well as thickeners for personal care products, food and pharmaceuticals. The bleached market pulps are used in products such as disposable diapers, feminine hygiene products and incontinence products.

Major activities areas include: wood handling facility, pulping system, purification, chemical recovery, power house, drying/ converting/ warehouse, and associated processes and equipment.

The existing facility consists of the following emissions units.

Facility ID No. 1230001	
ID No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
002	No. 1 POWER BOILER
003	No. 2 POWER BOILER
004	No. 1 BARK BOILER
006	No. 2 RECOVERY BOILER
007	No. 3 RECOVERY BOILER
011	No. 4 RECOVERY BOILER
019	No. 2 BARK BOILER
021	No. 2 SMELT DISSOLVING TANK
022	No. 3 SMELT DISSOLVING TANK
023	No. 4 SMELT DISSOLVING TANK
024	No. 4 LIME KILN AND STORAGE BINS (2)
025	TWO LIME SLAKERS
040	TALL OIL PROCESSING
041	No.2 PURIFICATION PLANT
045	No.1 PURIFICATION PLANT
046	PULPING AREA GENERAL
051	TRANSFORMER PROCESS
<i>Unregulated Emissions Units and Activities (Refer to Current Title V Operation Permit)</i>	
047	FACILITY WIDE FUGITIVE EMISSIONS
048	CHEMICAL RECOVERY AREA
049	DRYING/CONVERTING/WAREHOUSE
050	WOODYARD

SECTION 1. GENERAL INFORMATION

Proposed Project

This project authorizes the construction, installation, and implementation of equipment necessary for improvement of the existing Non-Condensable Gas (NCG) Collection System at the Foley Mill for compliance with the Kraft pulping system standards of 40 CFR 63 Subpart S.

The improvement projects consist of the following changes, which shall be substantially as described below and in the submitted permit application:

1. **New, Primary Condenser for TRS Accumulator- Digester System.** The existing primary condenser (manufactured by Rosenblad and sized for 740,000 lb/hr peak steam flow, 5,460 lb/hr peak NCG flow, 329,000 lb/hr sustained steam flow) located above the blow heat accumulator tank in the Batch Digester System will be replaced with a new primary condenser that is of a non-plugging design. The new condenser will be manufactured by Lundberg and of a cone-baffle design that the mill does not expect to plug with fiber. This new condenser shall be sized the same as the existing one.
2. **New, Parallel, Single- Stage Turpentine Condenser- Turpentine Recovery System.** A new, single-stage turpentine condenser (3'7" OD x 27' 2" long, 4100 sq ft) will be installed in parallel to the existing system which consists of a primary and secondary turpentine condenser in series. The new turpentine condenser will allow operational flexibility and will be only put in use when either the primary or secondary condenser needs to be taken out of service for cleaning, resulting in a redundant system. The capacity of the Turpentine Recovery System will not be increased with the installation of the new, single-stage Turpentine Condenser.
3. **Two, New, Turpentine Cyclones – Turpentine Recovery System.** The existing two turpentine cyclones (Cyclone A and B), are marginally sized for the service of separating black liquor from the turpentine vapor. Both cyclones are required in order to handle the full turpentine stream. Two, new cyclones will be installed in parallel, each with the capability of handling the full turpentine stream and are 8'6" OD x 102" sized for 46,165 lb/hr steam and 16,255 lb/hr NCG. Only one cyclone shall be operated at a given time. The existing two cyclones (6' 0" OD x 4'0" sized for maximum 943 lb/min vent gas flow) will be removed. Only one new cyclone will be operated at any given time. As such, the capacity of the Turpentine Recovery System will not be increased with the installation of the two, larger turpentine cyclones. The redundant cyclone will be used during required cleaning outages that occur several times in a year.
4. **New, No. 2 Evaporator Hotwell Overflow Tank – NCG System.** The NCGs from the Nos. 1 and 2 Evaporator hotwells are combined into a single collection header. The combined header requires both the Nos. 1 and 2 Evaporators to be shutdown in order to perform maintenance work on the NCG System for either of the evaporator sets. A new, evaporator hotwell overflow tank will be installed at the No. 2 Evaporator that will allow the No. 1 Evaporator to be separated from the No. 2 Evaporator during maintenance on the NCG collection system. There will not be an increase in the capacity of the Condensate Collection System or the NCG Collection System with the installation of the new No. 2 Evaporator overflow tank.
5. **Replacement of Water Seal Pressure/Vacuum Breakers (\pm 8 inches H₂O) with Pressure Vacuum Devices (\pm 25 inches H₂O) – NCG System.** The existing NCG system has five water seal pressure/vacuum breakers that are set to relieve at +/- 8 inches of water column or less. Water seals at the turpentine and the evaporator sources can relieve NCGs to the atmosphere or pull in air when the system pressure or vacuum exceeds the water seal settings. The mill will replace the five water seal pressure/vacuum breakers with four pressure/vacuum devices that can be set to +/- 25 inches of water

SECTION 1. GENERAL INFORMATION

column. Each one will be located in the vicinity of the evaporator hotwells – one device at each hotwell. The remaining water seal pressure/vacuum breaker will be eliminated by this project. The new devices will be continuously monitored via a connection to the mill-wide distributed control system (DCS).

6. **New, NCG Condensate Drain Tank- Condensate Collection System.** The existing condensate collection system accepts drainage from piping low points from both upstream and downstream of the NCG ejectors. The ejector differential pressure must therefore be considered carefully in the design of the drain lines. Sufficient seal elevation must be included in the drain design to prevent gases being recirculated from the downstream drains (or equalizing vent) to the suction drains, thus interfering with drainage and ejector capacity. The existing system is not functioning properly. The mill will install a 2 ft diameter by 11 ft tall condensate drain tank to replace the seal pot. Condensates from the low points in the NCG line will drain to the tank before being sent to the condensate collection and treatment system. The condensate drain tank will be a closed tank which will vent back to the NCG collection system, so there will be no emissions from the tank.
7. **Two, New, NCG Steam Ejectors – NCG System.** Install two new, single steam ejectors in parallel, to provide motive force for the transfer of the NCGs from the 40 CFR 63 Subpart S sources to the control device (No. 1 Bark Boiler and the TRS Pre-Scrubber followed by the No. 1 Power Boiler) locations. Each steam ejector shall have the capacity of 7500 lbs/hr (steam) and capable of handling the entire NCG stream. Only one NCG steam ejector will be operated at any one time. The new ejectors will have the ability to throttle the vacuum to only what is required to effectively transport the NCG vapors to the ejectors. The redundant NCG steam ejector will be used during required maintenance outages that occur several times during the year. The existing, three, NCG steam ejectors (sized 3010 lb/hr, 2630 lb/hr, and 960 lb/hr) shall be removed from the facility site.
8. **Two, new valves Nos. 3 and 4 Evaporators- NCG System.** Two small valves will be installed in existing 4-inch lines that will de-couple the Nos. 3 and 4 Multiple Effect Evaporators. Currently, any maintenance work associated with the NCG system on either of these evaporator sets requires both sets (Nos. 3 and 4) to be down. The installation of these valves will allow maintenance work to be done on the NCG system while only having the associated evaporator set out of service, allowing the other set to continue to operate.

The improvement projects will be constructed in three phases according to the following preliminary schedule:

Phase I: Install the tie-ins for the following equipment: the single-stage turpentine condenser located in the Turpentine Recovery System, the two turpentine cyclones located in the Turpentine Recovery System, the No. 2 Evaporator hotwell overflow tank for the separation of the No. 1 and No. 2 Evaporator Hot Wells, the NCG Drain Tank, and the two steam ejectors in the NCG System. Replace the existing primary condenser for the TRS Accumulator, replace a portion of the water seal pressure/vacuum breakers in the NCG System, and install the isolation valves to de-couple the No. 3 and No. 4 Evaporators. Construction is planned to occur during the Cold Mill Outage scheduled for May 2014.

Phase II: Install the No.2 Evaporator Hotwell Overflow Tank, the NCG Drain Tank, and the two steam ejectors in the NCG System, the remaining portion of the water seal pressure/vacuum breakers in the NCG System, and final equipment associated with de-coupling the No. 3 and No. 4 Evaporators. Construction/installation is planned to commence and be completed during the Dual Mill Outage scheduled for January 2015.

SECTION 1. GENERAL INFORMATION

Phase III: Install the single-stage turpentine condenser and the turpentine cyclones.

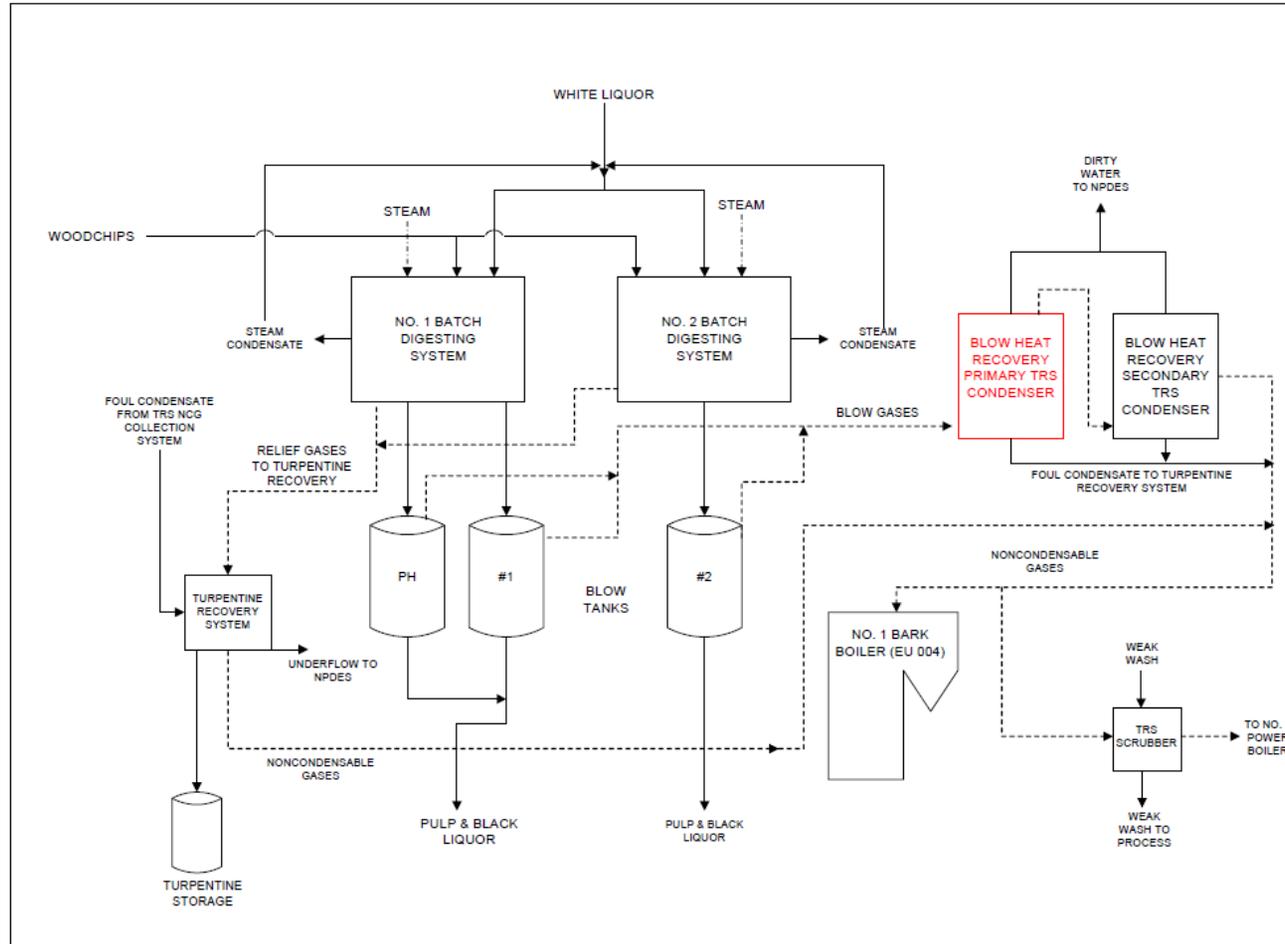
Construction/installation is planned to commence and be completed by September 2015. A mill outage is not required to complete this work.

Improvement Project Flow Diagrams:

SECTION 1. GENERAL INFORMATION

March 2014

113-87653B



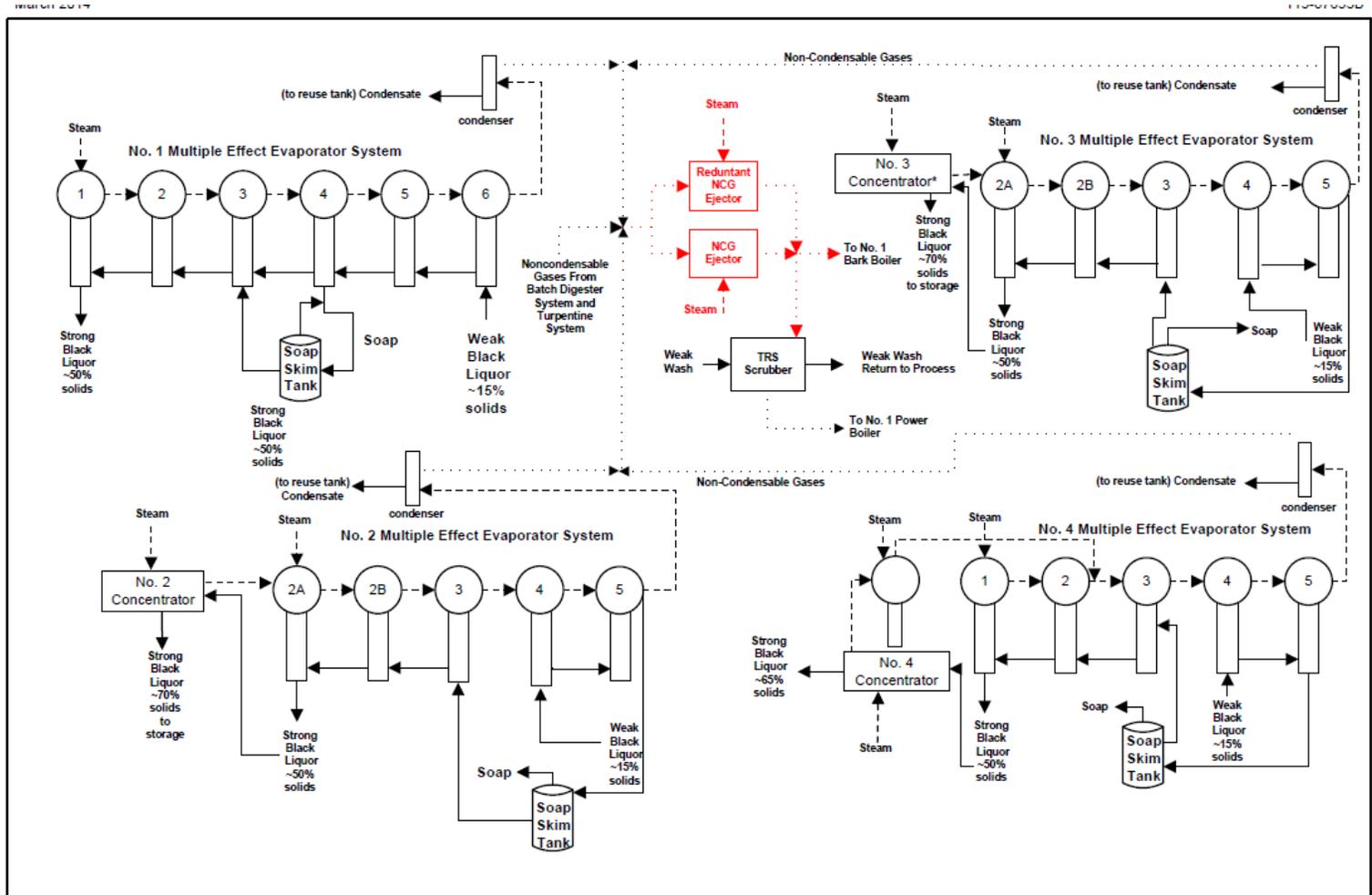
Attachment BFLP-EU1-11a
 Batch Digester System (EU 046)
 Buckeye Florida, L.P.
 (new/replacement equipment is in red)

Process Flow Legend:	
Solid / Liquid	—————>
Gas	- - - - ->
Steam	- · - · ->



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SECTION 1. GENERAL INFORMATION



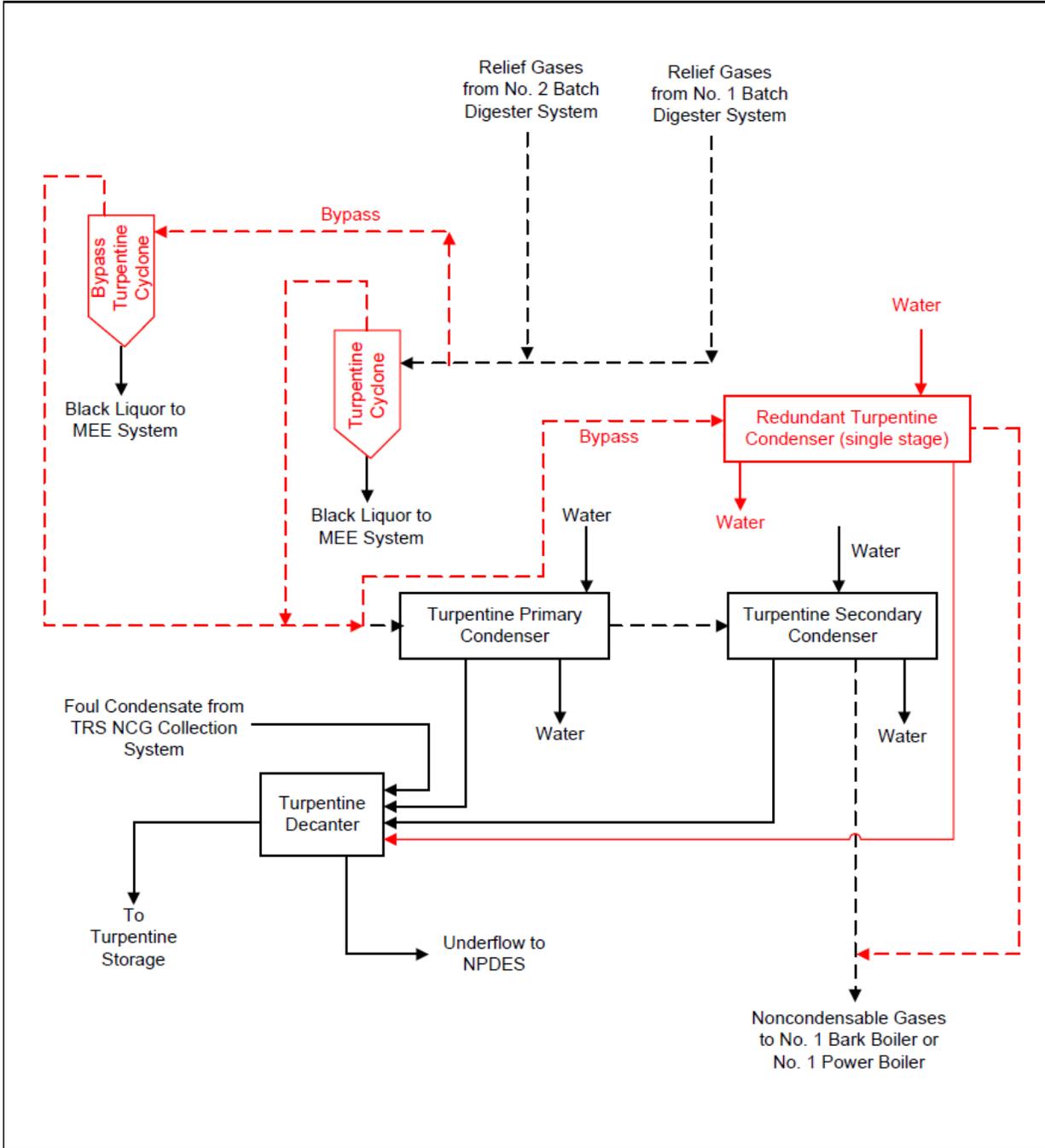
Attachment BFLP-EU1-11b Multiple Effect Evaporator System (EU 046) Buckeye Florida, L.P. (new equipment is in red)	Process Flow Legend Solid/Liquid → Gas → Steam →	
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SECTION 1. GENERAL INFORMATION

March 2014

113-87653B



Attachment BFLP-EU1-I1d
 Turpentine Recovery System (EU 046) - Proposed
 Buckeye Florida, L.P.
 (new/replacement equipment)

Process Flow Legend:
 Solid / Liquid →
 Gas - - - - -
 Steam ······

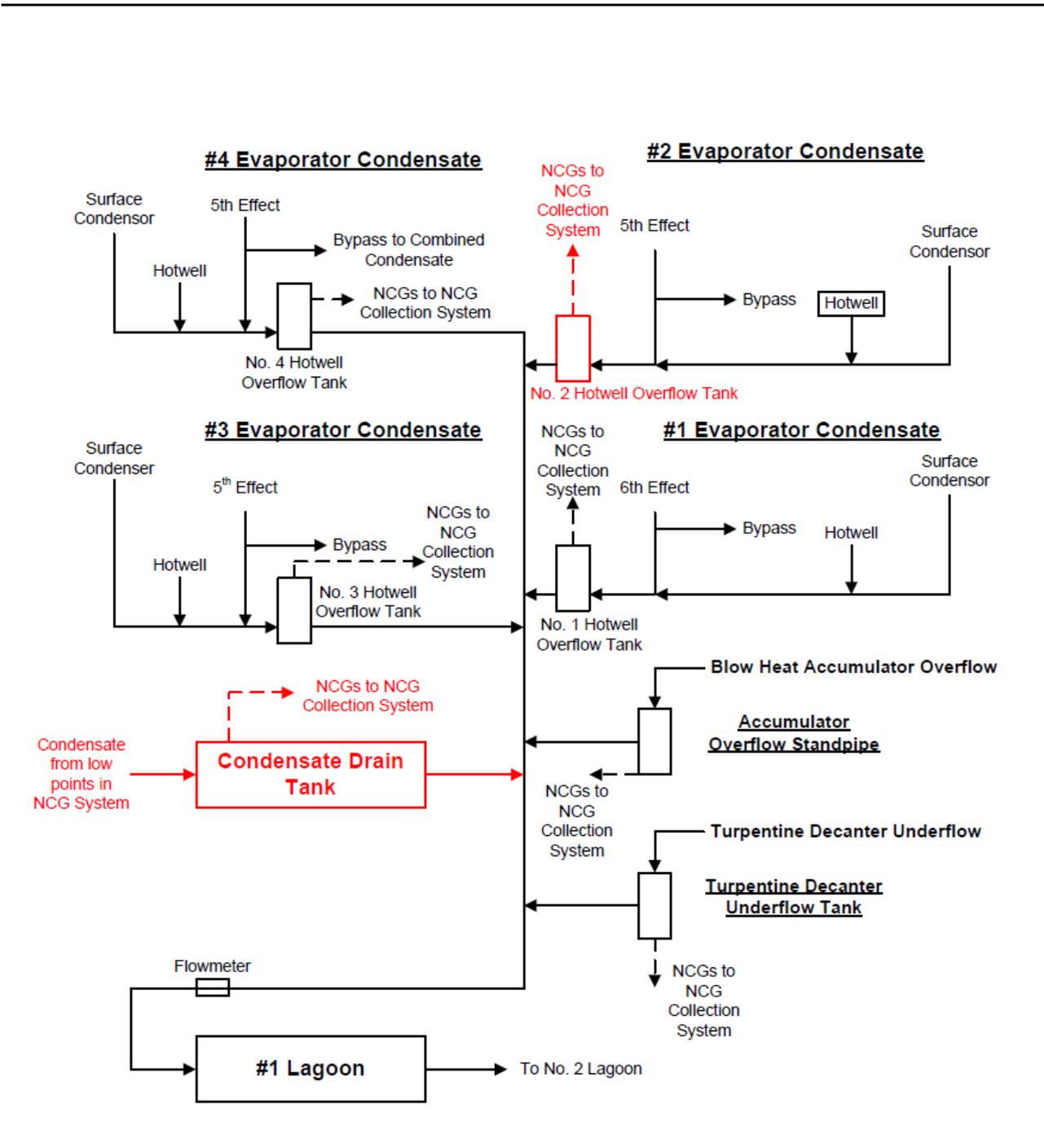


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SECTION 1. GENERAL INFORMATION

MARCH 2017

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Attachment BFLP-EU1-11e
 Condensate Collection System (EU 046)
 Buckeye Florida, L.P.
 (new equipment is in red)

Process Flow Legend:
 Solid / Liquid —————>
 Gas - - - - ->
 Steam - - - - ->



SECTION 1. GENERAL INFORMATION

AFFECTED EMISSIONS UNITS

This project affects following existing emissions units.

Facility ID No. 1230001	
ID No.	Emission Unit Description
<i>Regulated Emissions Units</i>	
046	PULPING AREA GENERAL

FACILITY REGULATORY CLASSIFICATION

- The facility is a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.
- This facility is a major source of air pollutants, other than HAPs.
- This facility has one or more emissions units subject to NSPS (40 CFR 60).
- This facility has one or more emissions units subject to NESHAP (40 CFR 61 or Part 63)

SECTION 2. ADMINISTRATIVE REQUIREMENTS

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Waste and Air Resource Management. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256-7590. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. The Compliance Authority's telephone number is 904/256-1700.
3. Appendices: The following Appendices are attached as part of this permit:
 - a. Appendix A. Citation Formats and Glossary of Common Terms;
 - b. Appendix B. General Conditions;
 - c. Appendix C. Common Conditions
 - d. Appendix D. Common Testing Requirements
 - e. Appendix E. 40 CFR 63 Subpart A – General Provision.
 - f. Appendix F. 40 CFR 63 Subpart S
4. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the owner or operator from compliance with any applicable federal, state, or local permitting or regulations.

[Rule 62-210.300, F.A.C.]
5. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time.

[Rule 62-4.080, F.A.C.]
6. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification.

[Rules 62-210.300(1) and 62-212.300(1) (a), F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

7. Source Obligation:

- a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.
- b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

[Rule 62-212.400(12), F.A.C.]

8. Construction Schedule: The following summarized the construction schedule for the proposed project:

- a. Phase I: Install the tie-ins for the following equipment: the single-stage turpentine condenser located in the Turpentine Recovery System, the two turpentine cyclones located in the Turpentine Recovery System, the No. 2 Evaporator hotwell overflow tank for the separation of the No. 1 and No. 2 Evaporator Hot Wells, the NCG Drain Tank, and the two steam ejectors in the NCG System. Replace the existing primary condenser for the TRS Accumulator, replace a portion of the water seal pressure/vacuum breakers in the NCG System, and install the isolation valves to de-couple the No. 3 and No. 4 Evaporators. Construction is planned to occur during the Cold Mill Outage scheduled for May 2014.
- b. Phase II: Install the No.2 Evaporator Hotwell Overflow Tank, the NCG Drain Tank, and the two steam ejectors in the NCG System, the remaining portion of the water seal pressure/vacuum breakers in the NCG System, and final equipment associated with de-coupling the No. 3 and No. 4 Evaporators. Construction/installation is planned to commence and be completed by during the Dual Mill Outage scheduled for January 2015.
- c. Phase III: Install the single-stage turpentine condenser and the turpentine cyclones. Construction/installation is planned to commence and be completed by September 2015. A mill outage is not required to complete this work.
- d. The Permittee shall provide the Compliance Authority a written notification of the actual date of commencement of project construction, and completion upon each project phase, delivered or postmarked within 15 calendar days after such date.
- e. The Permittee shall provide the Compliance Authority with updates to this schedule as necessary.

[Rule 62-4.070(3), F.A.C.; Application No. 1230001-046-AC]

9. Existing Permits and Regulations: The conditions of this permit supplements all other previously issued air construction permits for this emissions unit. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, operation of air pollution control devices, and the like. The Permittee shall also comply with the applicable Rules of 62-4, 62-210, 62-212, 62-213, 62-296, and 62-297, F.A.C.

[Rule 62-4.070, F.A.C.]

SECTION 2. ADMINISTRATIVE REQUIREMENTS

10. Application for Title V Permit: This permit authorizes construction of the permitted emissions units and initial operation. A Title V air operation permit is required for regular operation of the permitted emissions unit. The permittee shall apply for a Title V operation permit at least 90 days prior to expiration of this permit, but no later than 180 days after commencing operation of the emissions unit upon completion of Phase III of the project as stated in Section 2, Administrative Requirements, Condition 8.c. To apply for a Title V operation permit, the applicant shall submit the appropriate application form, compliance test results (if required), and such additional information as the Department may by law require. The application shall be submitted to the appropriate Permitting Authority.

[Rules 62-4.030, 62-4.050, and Chapter 62-213, F.A.C.]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
046	<p>Pulping System MACT I includes those sources regulated under MACT I: Nos. 1 and 2 Batch Digester systems, the Turpentine Recovery system (includes the turpentine Condenser, Decanter, Weir Box, and Underflow Tank), Multiple Effect Evaporator systems (Nos. 1-4), and the Pulping Process Condensate Collection System.</p> <p>Condensates from the Digester blow vent condensing system, the Turpentine Recovery System, the black liquor evaporator condensates from the MEE Systems (Nos. 1-4), and the NCG system condensates are pumped through a closed piping system to the No. 1 Lagoon for treatment to remove HAPs.</p> <p>High Volume, Low Concentration (HVLC) sources include the No. 1 Mill and No. 2 Mill Brown Stock Washer systems, and the Oxygen Delignification System. The aeration stabilization basin of the biological treatment system (the No. 1 Lagoon) is also included in this emissions unit as part of the Clean Condensate Alternative.</p>

{Permitting note: This emissions unit is regulated by 40 CFR 63, Subpart S – National Emission Standards for Hazardous Air Pollutants for Pulp Mills, adopted and incorporated by reference in Rule 62-204.800, F.A.C.

MODIFICATIONS

A.0. Authorized Modifications: The Permittee is authorized to conduct the following projects for improvements to the existing NCG System. Construction is set to commence and be completed as stated in Administrative Requirement Condition No. 8.

- a. **New, Primary Condenser for TRS Accumulator- Digester System.** Replace the existing primary condenser located above the blow heat accumulator tank with a new primary condenser that is of a cone-baffle design. The condenser shall have the same capacity as of the existing primary condenser.
- b. **New, Parallel, Single-Stage Turpentine Condenser- Turpentine Recovery System.** Install a new, single-stage turpentine condenser in parallel to the existing system which consists of a primary and secondary turpentine condenser in series. The new single-stage turpentine condenser shall be a redundant system. It shall only be operated when either the primary or secondary condenser of the parallel system needs to be taken out of service for cleaning.
- c. **Two, New, Turpentine Cyclones – Turpentine Recovery System.** Install two, new turpentine cyclones in parallel, for the purpose of separating black liquor from the turpentine vapor. Each cyclone shall be capable of handling the full turpentine stream flow. Only one cyclone shall be operated at a given time. The redundant cyclone shall be used during required cleaning outages that occur several times during a year. The existing two turpentine cyclones (Cyclones A and B) shall be removed from the facility site.
- d. **New, No. 2 Evaporator Hotwell Overflow Tank – Condensate Collection System.** Install a new, evaporator hotwell overflow tank at the No. 2 Evaporator that will allow for a separate NCG collection header for each of the No. 1 and No. 2 Evaporators. This will allow the No. 1 Evaporator to be separated from the No. 2 Evaporator during maintenance on the NCG collection system.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

- e. **Replacement of Water Seal Pressure/Vacuum Breakers (± 8 inches H₂O) with Pressure Vacuum Devices (± 25 inches H₂O) – NCG System.** Replace four of the existing five water seal pressure/vacuum breakers that are set to relieve at +/- 8 inches of water column or less in the NCG System with the installation of pressure/vacuum devices that can be set to +/- 25 inches of water column. The new devices will be located in the vicinity of the evaporator hotwells, one device at each hotwell. The remaining water seal pressure/vacuum breaker shall be eliminated by this project. The new devices will be continuously monitored via a connection to the mill-wide distributed control system (DCS).
- f. **New, NCG Condensate Drain Tank- Condensate Collection System.** Install a 2 ft diameter by 11 ft tall condensate drain tank to replace the seal pot. Condensates from the low points in the NCG line will drain to the tank before being sent to the condensate collection and treatment system. The condensate drain tank shall be a closed tank which will vent back to the NCG collection system. There shall be no emissions from the tank.
- g. **Two, New, NCG Steam Ejectors – NCG System.** Install two new, single steam ejectors in parallel, to provide motive force for the transfer of the NCGs from the 40 CFR 63 Subpart S sources to the control device (No. 1 Bark Boiler and the TRS Pre-Scrubber followed by the No. 1 Power Boiler) locations. Each steam ejector shall have the capability of handling the entire NCG stream. Only one NCG steam ejector will be operated at any one time. The redundant NCG steam ejector will be used during required maintenance outages that occur several times during the year. The existing, three, NCG steam ejectors shall be removed.
- h. **Two, new valves to de-couple Nos. 3 and 4 Evaporators- NCG System.** Install two small valves in existing 4-inch lines that will de-couple the Nos. 3 and 4 Multiple Effect Evaporators so that only the associated evaporator is required to be set out of service, allowing the other set to continue to operate, during maintenance work associated with the NCG System.

[Application No. 1230001-046-AC]

The following conditions apply to the emissions unit(s) listed above:

A.1. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart A – General Provisions as specified in 40 CFR Part 63, Subpart S, Table 1.

[40 CFR 63.440(g)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.2. Total HAP Emissions. Total HAP emission from the following equipment systems shall be controlled as specified in **Conditions A.3. and A.4.** below.

- Each LVHC System¹
- Each knotter or screen system with total HAP mass emission rates greater than or equal to the rates specified in paragraphs 1 and 2 below or the combined rate specified in paragraph 3 below:
 1. Each knotter system with emissions of 0.05 kilograms or more of total HAP per megagram of ODP (0.1 pounds per ton).
 2. Each screen system with emissions of 0.10 kilograms or more of total HAP per megagram of ODP (0.2 pounds per ton).
 3. Each knotter and screen system with emissions of 0.15 kilograms or more of total HAP per megagram of ODP (0.3 pounds per ton).
- Each Pulp Washing System²
- Each decker system that:
 1. Uses any process water other than fresh water or paper machine white water; or
 2. Uses any process water with a total HAP concentration greater than 400 parts per million by weight;
- Oxygen Delignification System²

¹ *Low volume, high concentration or LVHC system* means the collection of equipment including the digester, turpentine recovery³, evaporator, steam stripper systems, and any other equipment serving the same function as those previously listed.

² *The mill uses the Clean Condensate Alternative (CCA) Technology as described in 40 CFR 63.447 as an alternative to complying with the requirements specified in §63.443(a)(1)(ii) through (a)(1)(v) for the control of HAP emissions from these pulping systems.*

³ *Non-decanting turpentine storage tanks containing saleable product are not considered part of the turpentine recovery process.*

[EPA MACT I Rule Interpretation: Q&A's For The Pulp and Paper NESHAP, EPA Document, 9/22/99, Florida DEP Memorandum: Summary of Responses to MACT I Issues dated August 29, 2000]

[40 CFR 63.443(a); Construction Permit No. AC62-141919; Construction permit No. AC62-141920; Construction Permit No. AC62-141921; Construction Permit No. AC62-141916; Construction Permit No. AC62-141917; Construction Permit No. AC62-141918; Construction Permit No. 1230001-034-AC; Application No. 1230001-046-AC]

A.3. The equipment systems listed in **Condition A.2.** above shall be enclosed and vented into a closed-vent system and routed to the No. 1 Bark Boiler (primary control device) or the pre-scrubber followed by the No. 1 Power Boiler (secondary control device) for total HAP emission reduction. The control device(s) shall meet the requirements specified in **Condition A.4.** The enclosures and closed-vent system shall meet the requirements specified in **Condition A.6.**

[40 CFR 63.443(c)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.4. Total HAP emission Control Device(s). The No. 1 Bark Boiler (primary control device) and the pre-scrubber followed by the No. 1 Power Boiler (secondary control device) shall reduce total HAP emissions by introducing the HAP emission stream with the primary fuel or into the flame zone.

[40 CFR 63.443(d)(4)(i)]

A.5. Excess Emissions -Violation Periods of excess emissions reported under §63.455 shall not be a violation of **Conditions A.3. and A.4.** provided that the time of excess emissions divided by the total process operating time in a semi-annual reporting period does not exceed one percent for control devices used to reduce the total HAP emissions from the LVHC system.

[40 CFR 63.443(e)(1)]

A.6. Enclosures and closed-vent systems Requirements. Each enclosure and closed-vent system specified in **Condition No. A.3.** for capturing and transporting vent streams that contain HAP shall meet the following requirements.

- (a) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in **Condition A.38.** Each enclosure or hood opening closed during the initial performance test specified in **Condition A.34.** shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
- (b) Each component of the closed-vent system used to comply with **Condition No. A.3.** that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in **Condition A.37.**
- (c) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in 40 CFR 63.443 shall comply with either of the following requirements:
 - (1) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line¹; or
 - (2) For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a chained and locked closure mechanism in such a way that valve or closure mechanism cannot be opened without recording and reporting the valve opening or with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

¹ Buckeye demonstrates compliance with this condition by monitoring computer (DCS) controlled automatic valves with a continuous indication of any venting and the capability to record venting periods at least once every 15 minutes on each bypass line.

[40 CFR 63.450; 40 CFR 63.454(e); Construction Permit No. 1230001-011-AC]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Kraft pulping process condensates Standards

A.7. Pulping Process Condensates. The pulping process condensates from the following equipment systems shall be treated to meet the requirements specified in **Conditions A.8., A.9., A.10., and A.11.:**

- each digester system,
- each turpentine recovery system,
- each evaporator system condensate from:
 - a) the vapors from each stage where weak liquor is introduced (feed stages) and
 - b) each evaporator vacuum system for each stage where weak liquor is introduced (feed stages);
- each HVLC collection system; and
- each LVHC collection system.

[40 CFR 63.446(b)]

A.8. Pulping Process Condensates – Collection. The pulping process condensates generated, produced, or associated with the equipment systems listed in **Condition A.7.** that in total contain a total HAP mass of 11.1 pounds or more of total HAP per ton of ODP shall be subject to the requirements of **Conditions A.9.- A.11.**

[40 CFR 63.446(c)(3)]

A.9. Pulping Process Condensates – Closed Collection System. The pulping process condensates from the equipment systems listed in **Condition A.7.,** shall be conveyed in a closed collection system that is designed and operated to meet the individual drain system requirements specified in 40 CFR Part 63, Subpart RR, §§63.960, 63.961, and 63.962, except the closed vent systems and control devices (No. 1 Bark Boiler (primary control device) or the pre-scrubber followed by the No. 1 Power Boiler (secondary control device)) shall be designed and operated in accordance with **Condition A.4.** and the enclosures and closed-vent systems requirements specified in **Condition A.6.,** instead of in accordance with § 63.693 as specified in §63.962 (a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii).

[40 CFR 63.446(d)(1)]

A.10. Pulping Process Condensates – Condensate Drain Tank. If a condensate tank is used in the closed collection system, the tank shall meet the following requirements:

- (i) The fixed roof and all openings (e.g., access hatches, sampling ports, gauge wells) shall be designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in **Condition A.6.** and routed to a control device that meets the requirements in **Condition A.4.;** and
- (ii) Each opening shall be maintained in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair.

[40 CFR 63.446(d)(2)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.11. Pulping Process Condensates – Treatment. Each pulping process condensate from the equipment systems listed in **Condition No. A.7.** shall be discharged below the liquid surface of the biological treatment system and treated to remove 10.2 pounds or more of total HAP per ton of ODP. Total HAP shall be measured as acetaldehyde, methanol, methyl ethyl ketone, and propionaldehyde. The procedures specified in **Condition A.42.a.(1) or (2)** shall be followed.

[40 CFR 63.446(e)(2); 63.446(e)(5); 63.457(g)]

A.12. All new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP shall be evaluated to determine if they meet the applicable requirements of 40 CFR 63.446.

[40 CFR 63.446(h)]

CONTINUOUS MONITORING REQUIREMENTS

A.13. Continuous Monitoring System. Each owner or operator subject to the standards specified in Conditions **A.3., A.4., A.6.(c), A.8., A.9., A.10., and A.11.** shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS) as specified in **Condition Nos. A.14.a., A.14.b., A.14.c., A.15. through A.18.** The CMS shall include a continuous recorder.

[40 CFR 63.453(a)]

A.14.a. Condensate Collection. The Permittee shall maintain all manual condensate bypass line valves in the closed position. The Permittee shall secure the valves in the closed position with a traceable lock-seal device. Subsequent lock-seal removal, valve manipulation, and replacement lock-seals shall be recorded on the appropriate Startup, Shutdown, or Malfunction (SSM) form. Condensate tank/standpipe levels shall be continuously monitored and overflow levels confirmed at a frequency of no less than during the monthly visual inspections required by **Condition A.17.** Recorded overflows that result from an SSM event shall be documented on the appropriate SSM form.

[40 CFR 63.453(i)]

A.14.b. Condensate Collection CMS. A CMS shall be operated to measure the condensate collected pursuant to **Condition A.8.** The permittee shall determine the actual collection of condensate in pounds per oven-dried tons of unbleached pulp on a daily basis and averaged over a 15-day period (rolling average) using the recorded daily flow rate of the condensate header¹, the daily bleach grade pulp production, and the methanol concentration factor specified in **Condition A.14.c.**

¹ The mill's condensate collection system collects only pulping condensates from equipment systems listed in 40 CFR 63.446(b)(1)-(5), unnamed condensate sources are not present in this header. The flow data is available on the mill DCS system (tag name FR9028, 0-3000 GPM) for continuous monitoring and archived electronically in one-minute increments.

[40 CFR 63.453(i)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.14.c. Operating Parameters – Condensate Collection. The methanol concentration factor of 1300 ppm¹ shall be used to determine the daily, actual condensate collection in pounds per oven-dried tons of unbleached pulp using the procedures in **Condition A.14.b.**

¹ Methanol Concentration from the Initial Performance Test conducted March 19, 2007. The methanol concentration factor may be re-established according the procedures stated in **Condition A.19.**

[40 CFR 63.453(i); Initial Performance Test conducted March 19, 2007]

A.15. Condensate Treatment. The permittee shall perform the following daily monitoring procedures specified below:

- (1) Daily monitoring of the number of aerators in operation. The minimum number of aerators shall be 32 of which a minimum of 23 shall be in Zone 1 (i.e. 32 aerators x 24 hrs = 768 hours minimum).
- (2) Daily monitoring of the total horsepower of the minimum 32 aerators (each aerator is rated at 75 hp with a minimum of 1725 hp in Zone 1).
- (3) Daily monitoring of the Urea Ammonium Nitrate¹ concentration at the entrance to the No. 1 Lagoon, i.e. the Flume. The minimum measurement (as ammonia-nitrogen, NH₃-N) shall be 0.6 mg/L and averaged over a 3-day period (rolling average).
 - a. If the mill use an alternative nutrient, a performance test shall be conducted at the next scheduled quarterly performance test as specified in **Condition A.18.**
 - b. The owner or operator shall submit notification of the performance test to the Administrator as soon as practicable, but no later than 15 days prior to the date the performance test is scheduled to be conducted.
 - c. The mass removal emission limit specified in **Condition A.11.** remains applicable.
- (4) Daily monitoring of the Urea Ammonium Nitrate¹ concentration detected after the No. 1 Lagoon and prior to No. 2 Lagoon. The minimum measurement (as ammonia-nitrogen, NH₃-N) shall be any measurable quantity or 0.01 mg/L averaged over a 3-day period (rolling average).

¹ Nitrogen containing nutrients added to the No. 1 Lagoon to aid micro-organisms in breaking down the organic matter present in the effluent.

[40 CFR 63.453(j)(2); Initial Performance Test conducted March 19, 2007; Applicant information received November 3, 2009]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.16. Enclosure and Closed-Vent System –Inspections. Each enclosure and closed-vent system used to comply with **Condition No. A.6.** shall comply with the following requirements:

- (1) For each enclosure opening, a visual inspection of the closure mechanism specified in **Condition No. A.6.(a)** shall be performed once during each calendar month, with at least 21 days elapsed time between inspections, to ensure the opening is maintained in the closed position and sealed.
- (2) Each closed-vent system shall be visually inspected once during each calendar month, with at least 21 days elapsed time between inspections and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.
- (3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in **Condition No. A.6.(b)** measured annually by the procedures in **Condition No. A.37.**
- (4) Demonstrate annually that each enclosure opening is maintained at negative pressure as specified in **Condition No. A.38.**
- (5) The valve or closure mechanism specified in **Condition No. A.6.(c)(2)** shall be inspected at least once during each calendar month, with at least 21 days elapsed time between inspections, to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.
- (6) If an inspection required by **Conditions Nos. A.16.(1) through A.16.(5)** above, identifies visible defects in ductwork, piping, enclosures or connections to covers required in **Condition No. A.6.**, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable.
 - (i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.
 - (ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown.
 - (iii) or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

[40 CFR 63.453(k), EPA Alternate Approval Letter dated March 31, 2004]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.17. Pulping Process Condensate Closed Collection System- Inspections. Each pulping process condensate closed collection system used to comply with **Conditions A.9. and A.10.**, shall comply with the following:

- (1) Each pulping process condensate closed collection system shall be visually inspected once during each calendar month, with at least 21 days elapsed time between inspections, and shall comply with the inspection and monitoring requirements specified in 40 CFR 63.964 of Subpart RR, except:
 - (i) Owners or operators shall comply with the recordkeeping requirements of §63.454. instead of the requirements specified in 40 CFR 63.964(a)(1)(vi) and (b)(3) of Subpart RR.
 - (ii) Owners or operators shall comply with the inspection and monitoring requirements for closed-vent systems and control devices specified in **Conditions A.13. and A.16.** instead of the requirements specified in 40 CFR 63.964(a)(2) of Subpart RR.
- (2) Each condensate tank used in the closed collection system shall be operated with no detectable leaks as specified in **Condition A.10.(i)** measured initially and annually by the procedures specified in **Condition A.37.**
- (3) If an inspection required by this condition identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured, then corrective actions specified in 40 CFR 63.964(b) of Subpart RR shall be taken.

[40 CFR 63.453(l), EPA Alternate Approval Letter dated March 31, 2004]

A.18. Quarterly Performance Testing. The Permittee shall conduct a performance test each quarter using the procedures specified below.

Conduct a performance test as specified in **Condition A.38.a.** within 45 days after the beginning of each quarter and meet the applicable emission limit in **Condition A.11.**

- (i) The performance test conducted in the first quarter (annually) shall be performed for total HAP and meet the mass removal emission limit specified in **Condition A.11.** Total HAP shall be measured as acetaldehyde, methanol, methyl ethyl ketone, and propionaldehyde and the procedures in **Condition A.42.a.(1) or (2)** shall be followed.
- (ii) The remaining quarterly performance tests shall be performed as specified in **Condition A.18.(i)** except owners or operators may use the applicable methanol procedure in **Condition A.42.a.(1) or (2)** and the value of r determined during the first quarter test instead of measuring the additional HAP to determine a new value of r.

[40 CFR 63.453(j)(3); 40 CFR 63.457(g)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.19. Operating Parameters — Reestablishment/Establishment. To establish or reestablish the value for each operating parameter required to be monitored under **A.14.a., b., c., A.15., A.17. and A.18.,** or to establish appropriate parameters for **Conditions A.14., a., b., c. and A.15.** the permittee shall use the following procedures:

- (1) During subsequent performance tests, continuously record the operating parameter;
- (2) Determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented if necessary by engineering assessments and the manufacturer's recommendations;
- (3) The owner or operator shall provide for the Administrator's approval the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. Include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.

[40 CFR 63.453(n)]

A.20.a. Operating Parameters- Excursions. The control device shall be operated in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under **Conditions A.13., through A.19.** and established under 40 CFR 63 Subpart S. Except as provided in **Condition A.20.b.** operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by 40 CFR 63 Subpart S shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions.

[40 CFR 63.453(o)]

A.20.b. Monitoring Parameter – Excursions. The procedures of this Condition apply whenever a monitoring parameter excursion occurs, and the owner or operator chooses to conduct a performance test to demonstrate compliance with the applicable emission limit. A monitoring parameter excursion occurs whenever any of the monitoring parameters specified in **Condition A.15.** are below minimum operating parameter values or above maximum operating parameter values established in **Condition A.19.**

- (1) As soon as practical after the beginning of the monitoring parameter excursion, the following requirements shall be met:
 - (i) Before the steps in paragraph (1)(ii) or (iii) of this Condition are performed, all sampling and measurements necessary to meet the requirements in paragraph (2) of this Condition shall be conducted.
 - (ii) Steps shall be taken to repair or adjust the operation of the process to end the parameter excursion period.
 - (iii) Steps shall be taken to minimize total HAP emissions to the atmosphere during the parameter excursion period.
- (2) A parameter excursion is not a violation of the applicable emission standard if the results of the performance test conducted using the procedures in this paragraph demonstrate compliance with the applicable emission limit in **Condition A.11.**

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.20.b. Continued:

- (i) Conduct a performance test as specified in § 63.457 using the monitoring data specified in **Condition A.15.** that coincides with the time of the parameter excursion. No maintenance or changes shall be made to the open biological treatment system after the beginning of a parameter excursion that would influence the results of the performance test.
 - (ii) If the results of the performance test specified in paragraph (2)(i) of this Condition demonstrate compliance with the applicable emission limit in **Condition A.11.**, then the parameter excursion is not a violation of the applicable emission limit.
 - (iii) If the results of the performance test specified in paragraph (2)(i) of this Condition do not demonstrate compliance with the applicable emission limit in **Condition A.11.** because the total HAP mass entering the open biological treatment system is below the level needed to demonstrate compliance with the applicable emission limit in **Condition A.11.**, then the owner or operator shall perform the following comparisons:
 - (A) If the value of f_{bio} (MeOH) determined during the performance test specified in paragraph (2)(i) of this Condition is within the range of values established during the initial and subsequent performance tests approved by the Administrator, then the parameter excursion is not a violation of the applicable standard.
 - (B) If the value of f_{bio} (MeOH) determined during the performance test specified in paragraph (2)(i) of this Condition is not within the range of values established during the initial and subsequent performance tests approved by the Administrator, then the parameter excursion is a violation of the applicable standard.
 - (iv) The results of the performance test specified in paragraph (2)(i) of this Condition shall be recorded as specified in **Condition A.26.**
- (3) If an owner or operator determines that performing the required procedures under paragraph (2) of this Condition for a nonthoroughly mixed open biological system would expose a worker to dangerous, hazardous, or otherwise unsafe conditions, all of the following procedures shall be performed:
- (i) Calculate the mass removal or percent reduction value using the procedures specified in **Condition A.42.a.** except the value for f_{bio} (MeOH) shall be determined using the procedures in Appendix E to Part 63.
 - (ii) Repeat the procedures in paragraph (3)(i) of this Condition for every day until the unsafe conditions have passed.
 - (iii) A parameter excursion is a violation of the standard if the percent reduction or mass removal determined in paragraph (3)(i) of this Condition is less than the mass removal standards specified in **Condition A.11.**, unless the value of f_{bio} (MeOH) determined using the procedures in Appendix E of Part 63, as specified in paragraph (3)(i), is within the range of f_{bio} (MeOH) values established during the initial and subsequent performance tests previously approved by the Administrator.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.20.b. Continued:

- (iv) The determination that there is a condition that exposes a worker to dangerous, hazardous, or otherwise unsafe conditions shall be documented according to requirements in **Condition A.26.** and reporting in **Condition A.42.**
- (v) The requirements of paragraphs (1) and (2) of this Condition shall be performed and met as soon as practical but no later than 24 hours after the conditions have passed that exposed a worker to dangerous, hazardous, or otherwise unsafe conditions.

[40 CFR 63.453(p)]

A.21. At all times, the owner or operator must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.453(q)]

RECORDKEEPING REQUIREMENTS

A.22. The owner or operator of each affected source subject to the requirements of this subpart shall comply with the recordkeeping requirements of 40 CFR 63.10, as shown in Table 1, and the requirements specified in **Conditions A.23. through A.27.** for the monitoring parameters specified in 40 CFR 63.453.

[40 CFR 63.454(a)]

A.23. For each applicable enclosure opening, closed-vent system, and closed collection system, the owner or operator shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment and shall record the following information for each inspection:

- (1) Date of inspection;
- (2) The equipment type and identification;
- (3) Results of negative pressure tests for enclosures;
- (4) Results of leak detection tests;
- (5) The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection);
- (6) The date the defect or leak was detected and the date of each attempt to repair the defect or leak;
- (7) Repair methods applied in each attempt to repair the defect or leak;
- (8) The reason for the delay if the defect or leak is not repaired within 15 days after discovery;
- (9) The expected date of successful repair of the defect or leak if the repair is not completed within 15 days;
- (10) The date of successful repair of the defect or leak;
- (11) The position and duration of opening of bypass line valves and the condition of any valve seals; and
- (12) The duration of the use of bypass valves on computer controlled valves.

[40 CFR 63.454(b)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.24. The owner or operator shall record the CMS parameters specified in 40 CFR 63.453 and meet the requirements specified in **Condition A.22.** for any new affected process equipment or pulping process condensate stream that becomes subject to the standards in this subpart due to a process change or modification.

[40 CFR 63.454(d)]

A.25. The owner or operator shall set the flow indicator on each bypass line specified in **Condition A.6.(c)(1)** to provide a record of the presence of gas stream flow in the bypass line at least once every 15 minutes.

[40 CFR 63.454(e)]

A.26. The owner or operator of an open biological treatment system complying with **Condition A.20.b.** shall prepare a written record specifying the results of the performance test specified in **Condition A.20.b.(2).**

[40 CFR 63.454(f)]

A.27. Recordkeeping of malfunctions. The owner or operator must maintain the following records of malfunctions:

- (1) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
- (2) Records of actions taken during periods of malfunction to minimize emissions in accordance with **Condition A.21.** including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[40 CFR 63.454(g)]

REPORTING REQUIREMENTS

A.28. The owner or operator shall comply with the reporting requirements of 40 CFR Part 63 Subpart A as specified in Table 1 and all of the requirements stated in **Conditions A.28. through A.33.**

[40 CFR 63.455(a)]

A.29. The owner or operator shall meet the requirements specified in **Condition A.28.** upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of this subpart due to a process change or modification.

[40 CFR 63.455(d)]

A.30. If the owner or operator uses the results of the performance test required in **Condition A.20.b.(2)** to revise the approved values or ranges of the monitoring parameters specified in **Condition A.15.**, the owner or operator shall submit an initial notification of the subsequent performance test to the Administrator as soon as practicable, but no later than 15 days, before the performance test required in **Condition A.20.b.(2)** is scheduled to be conducted. The owner or operator shall notify the Administrator as soon as practicable, but no later than 24 hours, before the performance test is scheduled to be conducted to confirm the exact date and time of the performance test. [40 CFR 63.455(e)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.31. To comply with the open biological treatment system monitoring provisions of **Condition A.20.b.(3)**, the owner or operator shall notify the Administrator as soon as practicable of the onset of the dangerous, hazardous, or otherwise unsafe conditions that did not allow a compliance determination to be conducted using the sampling and test procedures in **Condition A.42.a.** The notification shall occur no later than 24 hours after the onset of the dangerous, hazardous, or otherwise unsafe conditions and shall include the specific reason(s) that the sampling and test procedures in **Condition A.42.a.** could not be performed.

[40 CFR 63.455(f)]

A.32. Malfunction reporting requirements. If a malfunction occurred during the reporting period, the report must include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with **Condition A.21.**, including actions taken to correct a malfunction.

[40 CFR 63.455(g)]

A.33. The owner or operator must submit performance test reports as specified in paragraphs (1) through (4) of this Condition.

- (1) The owner or operator of an affected source shall report the results of the performance test before the close of business on the 60th day following the completion of the performance test, unless approved otherwise in writing by the Administrator. A performance test is “completed” when field sample collection is terminated. Unless otherwise approved by the Administrator in writing, results of a performance test shall include the analysis of samples, determination of emissions and raw data. A complete test report must include the purpose of the test; a brief process description; a complete unit description, including a description of feed streams and control devices; sampling site description; pollutants measured; description of sampling and analysis procedures and any modifications to standard procedures; quality assurance procedures; record of operating conditions, including operating parameters for which limits are being set, during the test; record of preparation of standards; record of calibrations; raw data sheets for field sampling; raw data sheets for field and laboratory analyses; chain-of-custody documentation; explanation of laboratory data qualifiers; example calculations of all applicable stack gas parameters, emission rates, percent reduction rates, and analytical results, as applicable; and any other information required by the test method and the Administrator.
- (2) Within 60 days after the date of completing each performance test (defined in §63.2) as required by this subpart, the owner or operator must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (<http://www.epa.gov/cdx>). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in this paragraph

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.33. Continued:

at the discretion of the delegated authority, the owner or operator must also submit these reports, including the CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13.

- (3) Within 60 days after the date of completing each CEMS performance evaluation test as defined in §63.2, the owner or operator must submit relative accuracy test audit (RATA) data to the EPA's CDX by using CEDRI in accordance with paragraph (2) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, the owner or operator must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13.
- (4) All reports required by this subpart not subject to the requirements in paragraphs (2) and (3) of this section must be sent to the Administrator at the appropriate address listed in §63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to paragraphs (2) and (3) of this Condition in paper format

[40 CFR 63.455(h)]

TEST METHODS AND PROCEDURES

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.34. Performance tests. Initial and repeat performance tests are required for the emissions sources specified in paragraphs (1) and (2) of this condition, except for emission sources controlled by a combustion device that is designed and operated as specified in **Condition A.4.**

- (1) Conduct an initial performance test for all emission sources subject to the limitations in §§63.443, 63.445, 63.446, and 63.447.
- (2) Conduct repeat performance tests at five-year intervals for all emission sources subject to the limitations in §§63.443, and 63.445. The first of the 5-year repeat tests must be conducted by September 7, 2015, and thereafter within 60 months from the date of the previous performance test. Five-year repeat testing is not required for the following:
 - (i) Knotter or screen systems with HAP emission rates below the criteria specified in §63.443(a)(1)(ii).
 - (ii) Decker systems using fresh water or paper machine white water, or decker systems using process water with a total HAP concentration less than 400 parts per million by weight as specified in §63.443(a)(1)(iv).

{Permitting Note: This condition does not change the performance testing frequencies as delineated in the current Title Operation Permit No. 1230001-044-AV. The initial performance testing required by Condition A.34.(1) has been previously satisfied by the Foley Mill. The results of performance testing as delineated in Title V Operation Permit No. 1230001-044-AV shall be used to satisfy Condition A.34.(2).}

[40 CFR 63.457(a)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.35. Vent sampling port locations and gas stream properties. For purposes of selecting vent sampling port locations and determining vent gas stream properties, required in §§63.443, 63.445, and 63.447, each owner or operator shall comply with the applicable procedures in paragraphs (b)(1) through (b)(6) of this section.

- (1) Method 1 or 1A of part 60, appendix A-1, as appropriate, shall be used for selection of the sampling site as follows:
 - (i) To sample for vent gas concentrations and volumetric flow rates, the sampling site shall be located prior to dilution of the vent gas stream and prior to release to the atmosphere;
 - (ii) For determining compliance with percent reduction requirements, sampling sites shall be located prior to the inlet of the control device and at the outlet of the control device; measurements shall be performed simultaneously at the two sampling sites; and
 - (iii) For determining compliance with concentration limits or mass emission rate limits, the sampling site shall be located at the outlet of the control device.
- (2) No traverse site selection method is needed for vents smaller than 0.10 meter (4.0 inches) in diameter.
- (3) The vent gas volumetric flow rate shall be determined using Method 2, 2A, 2C, or 2D of part 60, appendix A-1, as appropriate.
- (4) The moisture content of the vent gas shall be measured using Method 4 of part 60, appendix A-3.
- (5) To determine vent gas concentrations, the owner or operator shall conduct a minimum of three test runs that are representative of normal conditions and average the resulting pollutant concentrations using the following procedures:
 - (i) Method 308 in Appendix A of this part; Method 320 in Appendix A of this part; Method 18 in appendix A-6 of part 60; ASTM D6420-99 (Reapproved 2004) (incorporated by reference in §63.14(b)(28) of subpart A of this part); or ASTM D6348-03 (incorporated by reference in §63.14(b)(54) of subpart A of this part) shall be used to determine the methanol concentration. If ASTM D6348-03 is used, the conditions specified in paragraphs (b)(5)(i)(A) through (b)(5)(i)(B) must be met.
 - (A) The test plan preparation and implementation in the Annexes to ASTM D6348-03, sections A1 through A8 are required.
 - (B) In ASTM D6348-03 Annex A5 (Analyte Spiking Technique), the percent (%) R must be determined for each target analyte (Equation A5.5 of ASTM D6348-03). In order for the test data to be acceptable for a compound, %R must be between 70 and 130 percent. If the %R value does not meet this criterion for a target compound, the test data is not acceptable for that compound and the test must be repeated for that analyte following adjustment of the sampling or analytical procedure before the retest. The %R value for each compound must be reported in the test report, and all field measurements must be corrected with the calculated %R value for that compound using the following equation: Reported Result = Measured Concentration in the Stack × 100/%R.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.35. Continued:

- (ii) Except for the modifications specified in paragraphs (b)(5)(ii)(A) through (b)(5)(ii)(K) of this section, Method 26A of part 60, appendix A-8 shall be used to determine chlorine concentration in the vent stream.
 - (A) *Probe/sampling line.* A separate probe is not required. The sampling line shall be an appropriate length of 0.64 cm (0.25 in) OD Teflon[®] tubing. The sample inlet end of the sampling line shall be inserted into the stack in such a way as to not entrain liquid condensation from the vent gases. The other end shall be connected to the impingers. The length of the tubing may vary from one sampling site to another, but shall be as short as possible in each situation. If sampling is conducted in sunlight, opaque tubing shall be used. Alternatively, if transparent tubing is used, it shall be covered with opaque tape.
 - (B) *Impinger train.* Three 30 milliliter (ml) capacity midget impingers shall be connected in series to the sampling line. The impingers shall have regular tapered stems. Silica gel shall be placed in the third impinger as a desiccant. All impinger train connectors shall be glass and/or Teflon[®].
 - (C) *Critical orifice.* The critical orifice shall have a flow rate of 200 to 250 ml/min and shall be followed by a vacuum pump capable of providing a vacuum of 640 millimeters of mercury (mm Hg). A 45 millimeter diameter in-line Teflon 0.8 micrometer filter shall follow the impingers to protect the critical orifice and vacuum pump.
 - (D) The following are necessary for the analysis apparatus:
 - (1) Wash bottle filled with deionized water;
 - (2) 25 or 50 ml graduated burette and stand;
 - (3) Magnetic stirring apparatus and stir bar;
 - (4) Calibrated pH Meter;
 - (5) 150-250 ml beaker or flask; and
 - (6) A 5 ml pipette.
 - (E) The procedures listed in paragraphs (b)(5)(ii)(E)(1) through (b)(5)(ii)(E)(7) of this section shall be used to prepare the reagents.
 - (1) To prepare the 1 molarity (M) potassium dihydrogen phosphate solution, dissolve 13.61 grams (g) of potassium dihydrogen phosphate in water and dilute to 100 ml.
 - (2) To prepare the 1 M sodium hydroxide solution (NaOH), dissolve 4.0 g of sodium hydroxide in water and dilute to 100 ml.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.35. Continued:

- (3) To prepare the buffered 2 percent potassium iodide solution, dissolve 20 g of potassium iodide in 900 ml water. Add 50 ml of the 1 M potassium dihydrogen phosphate solution and 30 ml of the 1 M sodium hydroxide solution. While stirring solution, measure the pH of solution electrometrically and add the 1 M sodium hydroxide solution to bring pH to between 6.95 and 7.05.
- (4) To prepare the 0.1 normality (N) sodium thiosulfate solution, dissolve 25 g of sodium thiosulfate, pentahydrate, in 800 ml of freshly boiled and cooled distilled water in a 1-liter volumetric flask. Dilute to volume. To prepare the 0.01 N sodium thiosulfate solution, add 10.0 ml standardized 0.1 N sodium thiosulfate solution to a 100 ml volumetric flask, and dilute to volume with water.
- (5) To standardize the 0.1 N sodium thiosulfate solution, dissolve 3.249 g of anhydrous potassium bi-iodate, primary standard quality, or 3.567 g potassium iodate dried at 103 \pm 2 degrees Centigrade for 1 hour, in distilled water and dilute to 1000 ml to yield a 0.1000 N solution. Store in a glass-stoppered bottle. To 80 ml distilled water, add, with constant stirring, 1 ml concentrated sulfuric acid, 10.00 ml 0.1000 N anhydrous potassium bi-iodate, and 1 g potassium iodide. Titrate immediately with 0.1 n sodium thiosulfate titrant until the yellow color of the liberated iodine is almost discharged. Add 1 ml starch indicator solution and continue titrating until the blue color disappears. The normality of the sodium thiosulfate solution is inversely proportional to the ml of sodium thiosulfate solution consumed:

$$\text{Normality of Sodium Thiosulfate} = \frac{1}{\text{ml Sodium Thiosulfate Consumed}}$$

- (6) To prepare the starch indicator solution, add a small amount of cold water to 5 g starch and grind in a mortar to obtain a thin paste. Pour paste into 1 L of boiling distilled water, stir, and let settle overnight. Use clear supernate for starch indicator solution.
 - (7) To prepare the 10 percent sulfuric acid solution, add 10 ml of concentrated sulfuric acid to 80 ml water in a 100 ml volumetric flask. Dilute to volume.
- (F) The procedures specified in paragraphs (b)(5)(ii)(F)(1) through (b)(5)(ii)(F)(5) of this section shall be used to perform the sampling.
- (1) *Preparation of collection train.* Measure 20 ml buffered potassium iodide solution into each of the first two impingers and connect probe, impingers, filter, critical orifice, and pump. The sampling line and the impingers shall be shielded from sunlight.
 - (2) *Leak and flow check procedure.* Plug sampling line inlet tip and turn on pump. If a flow of bubbles is visible in either of the liquid impingers, tighten fittings and adjust connections and impingers. A leakage rate not in excess of 2 percent of the sampling rate is acceptable.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.35. Continued:

Carefully remove the plug from the end of the probe. Check the flow rate at the probe inlet with a bubble tube flow meter. The flow should be comparable or slightly less than the flow rate of the critical orifice with the impingers off-line. Record the flow and turn off the pump.

- (3) *Sample collection.* Insert the sampling line into the stack and secure it with the tip slightly lower than the port height. Start the pump, recording the time. End the sampling after 60 minutes, or after yellow color is observed in the second in-line impinger. Record time and remove the tubing from the vent. Recheck flow rate at sampling line inlet and turn off pump. If the flow rate has changed significantly, redo sampling with fresh capture solution. A slight variation (less than 5 percent) in flow may be averaged. With the inlet end of the line elevated above the impingers, add about 5 ml water into the inlet tip to rinse the line into the first impinger.
- (4) *Sample analysis.* Fill the burette with 0.01 N sodium thiosulfate solution to the zero mark. Combine the contents of the impingers in the beaker or flask. Stir the solution and titrate with thiosulfate until the solution is colorless. Record the volume of the first endpoint (TN, ml). Add 5 ml of the 10 percent sulfuric acid solution, and continue the titration until the contents of the flask are again colorless. Record the total volume of titrant required to go through the first and to the second endpoint (TA, ml). If the volume of neutral titer is less than 0.5 ml, repeat the testing for a longer period of time. It is important that sufficient lighting be present to clearly see the endpoints, which are determined when the solution turns from pale yellow to colorless. A lighted stirring plate and a white background are useful for this purpose.
- (5) *Interferences.* Known interfering agents of this method are sulfur dioxide and hydrogen peroxide. Sulfur dioxide, which is used to reduce oxidant residuals in some bleaching systems, reduces formed iodine to iodide in the capture solution. It is therefore a negative interference for chlorine, and in some cases could result in erroneous negative chlorine concentrations. Any agent capable of reducing iodine to iodide could interfere in this manner. A chromium trioxide impregnated filter will capture sulfur dioxide and pass chlorine and chlorine dioxide. Hydrogen peroxide, which is commonly used as a bleaching agent in modern bleaching systems, reacts with iodide to form iodine and thus can cause a positive interference in the chlorine measurement. Due to the chemistry involved, the precision of the chlorine analysis will decrease as the ratio of chlorine dioxide to chlorine increases. Slightly negative calculated concentrations of chlorine may occur when sampling a vent gas with high concentrations of chlorine dioxide and very low concentrations of chlorine.

- (G) The following calculation shall be performed to determine the corrected sampling flow rate:

$$S_c = S_v \left(\frac{BP - PW}{760} \right) \left(\frac{293}{273 + t} \right)$$

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.35. Continued:

Where:

S_C = Corrected (dry standard) sampling flow rate, liters per minute;

S_U = Uncorrected sampling flow rate, L/min;

BP=Barometric pressure at time of sampling;

PW=Saturated partial pressure of water vapor, mm Hg at temperature; and

t=Ambient temperature, °C.

- (H) The following calculation shall be performed to determine the moles of chlorine in the sample:

$$Cl_2 \text{ Moles} = 1/8000 (5 T_N - T_A) \times N_{Thio}$$

Where:

T_N = Volume neutral titer, ml;

T_A = Volume acid titer (total), ml; and

N_{Thio} = Normality of sodium thiosulfate titrant.

- (I) The following calculation shall be performed to determine the concentration of chlorine in the sample:

$$Cl_2 \text{ ppmv} = \frac{3005 (5 T_N - T_A) \times N_{Thio}}{S_C \times t_s}$$

Where:

S_C = Corrected (dry standard) sampling flow rate, liters per minute;

t_s = Time sampled, minutes;

T_N = Volume neutral titer, ml;

T_A = Volume acid titer (total), ml; and

N_{Thio} = Normality of sodium thiosulfate titrant.

- (J) The following calculation shall be performed to determine the moles of chlorine dioxide in the sample:

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.35. Continued:

$$ClO_2 \text{ Moles} = 1/4000(T_A - T_N) \times N_{Thio}$$

Where:

T_A = Volume acid titer (total), ml;

T_N = Volume neutral titer, ml; and

N_{Thio} = Normality of sodium thiosulfate titrant.

- (K) The following calculation shall be performed to determine the concentration of chlorine dioxide in the sample:

$$ClO_2 \text{ ppmv} = \frac{6010(T_A - T_N) \times N_{Thio}}{S_C \times t_S}$$

Where:

S_C = Corrected (dry standard) sampling flow rate, liters per minute;

t_S = Time sampled, minutes;

T_A = Volume acid titer (total), ml;

T_N = Volume neutral titer, ml; and

N_{Thio} = Normality of sodium thiosulfate titrant.

- (iii) Any other method that measures the total HAP or methanol concentration that has been demonstrated to the Administrator's satisfaction.
- (6) The minimum sampling time for each of the three test runs shall be 1 hour in which either an integrated sample or four grab samples shall be taken. If grab sampling is used, then the samples shall be taken at approximately equal intervals in time, such as 15 minute intervals during the test run.

[40 CFR 63.457(b)]

A.36. Liquid sampling locations and properties. For purposes of selecting liquid sampling locations and for determining properties of liquid streams such as wastewaters, process waters, and condensates required by 40 CFR 63.446, and 63.447, the owner or operator shall comply with the following procedures:

- (1) Samples shall be collected using the sampling procedures of the test method listed in paragraph (3) of this Condition selected to determine liquid stream HAP concentrations;

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.36. Continued:

- (i) Where feasible, samples shall be taken from an enclosed pipe prior to the liquid stream being exposed to the atmosphere; and
 - (ii) When sampling from an enclosed pipe is not feasible, samples shall be collected in a manner to minimize exposure of the sample to the atmosphere and loss of HAP compounds prior to sampling.
- (2) The volumetric flow rate of the entering and exiting liquid streams shall be determined using the inlet and outlet flow meters or other methods demonstrated to the Administrator's satisfaction. The volumetric flow rate measurements to determine actual mass removal shall be taken at the same time as the concentration measurements.
 - (3) The owner or operator shall conduct a minimum of three test runs that are representative of normal conditions and average the resulting pollutant concentrations. The minimum sampling time for each test run shall be 1 hour and the grab or composite samples shall be taken at approximately equally spaced intervals over the 1-hour test run period. The owner or operator shall use one of the following procedures to determine total HAP or methanol concentration:

- (i) Method 305 in Appendix A of this part, adjusted using the following equation:

$$\bar{C} = \sum_{i=1}^n \frac{C_i}{fm_i}$$

where:

C = Pollutant concentration for the liquid stream, parts per million by weight.

C_i = Measured concentration of pollutant i in the liquid stream sample determined using Method 305, parts per million by weight.

fm_i = Pollutant-specific constant that adjusts concentration measured by Method 305 to actual liquid concentration; the fm for methanol is 0.85. Additional pollutant fm values can be found in table 34, subpart G of this part.

n = Number of individual pollutants, i, summed to calculate total HAP.

- (ii) For determining methanol concentrations, NCASI Method DI/MEOH-94.03. This test method is incorporated by reference in Sec. 63.14(f)(1) of subpart A of Part 63.
 - (iii) Any other method that measures total HAP concentration that has been demonstrated to the Administrator's satisfaction.
- (4) To determine soluble BOD₅ in the effluent stream from an open biological treatment unit used to comply with **Condition A.11.** and **Condition A.18.**, the owner or operator shall use Method 405.1, of part 136, with the following modifications:

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.36. Continued:

- (i) Filter the sample through the filter paper, into Erlenmeyer flask by applying a vacuum to the flask sidearm. Minimize the time for which vacuum is applied to prevent stripping of volatile organics from the sample. Replace filter paper as often as needed in order to maintain filter times of less than approximately 30 seconds per filter paper. No rinsing of sample container or filter bowl into the Erlenmeyer flask is allowed.
 - (ii) Perform Method 405.1 on the filtrate obtained in paragraph (4) of this Condition. Dilution water shall be seeded with 1 milliliter of final effluent per liter of dilution water. Dilution ratios may require adjustment to reflect the lower oxygen demand of the filtered sample in comparison to the total BOD₅. Three BOD bottles and different dilutions shall be used for each sample.
- (5) If the test method used to determine HAP concentration indicates that a specific HAP is not detectable, the value determined as the minimum measurement level (MML) of the selected test method for the specific HAP shall be used in the compliance demonstration calculations. To determine the MML for a specific HAP using one of the test methods specified in paragraph (3) of this Condition, one of the procedures specified in paragraphs (5)(i) and (ii) of this Condition shall be performed. The MML for a particular HAP must be determined only if the HAP is not detected in the normal working range of the method.
- (i) To determine the MML for a specific HAP, the following procedures shall be performed each time the method is set up. Set up is defined as the first time the analytical apparatus is placed in operation, after any shut down of 6 months or more, or any time a major component of the analytical apparatus is replaced.
 - (A) Select a concentration value for the specific HAP in question to represent the MML. The value of the MML selected shall not be below the calibration standard of the selected test method.
 - (B) Measure the concentration of the specific HAP in a minimum of three replicate samples using the selected test method. All replicate samples shall be run through the entire analytical procedure. The samples must contain the specific HAP at the selected MML concentration and should be representative of the liquid streams to be analyzed in the compliance demonstration. Spiking of the liquid samples with a known concentration of the target HAP may be necessary to ensure that the HAP concentration in the three replicate samples is at the selected MML.

The concentration of the HAP in the spiked sample must be within 50 percent of the proposed MML for the demonstration to be valid. As an alternative to spiking, a field sample above the MML may be diluted to produce a HAP concentration at the MML. To be a valid demonstration, the diluted sample must have a HAP concentration within 20 percent of the proposed MML, and the field sample must not be diluted by more than a factor of five.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.36. Continued:

- (C) Calculate the relative standard deviation (RSD) and the upper confidence limit at the 95 percent confidence level using the measured HAP concentrations determined in paragraph (5)(i)(B) of this Condition. If the upper confidence limit of the RSD is less than 30 percent, then the selected MML is acceptable. If the upper confidence limit of the RSD is greater than or equal to 30 percent, then the selected MML is too low, and the procedures specified in paragraphs (5)(i)(A) through (C) of this Condition must be repeated.
 - (ii) Provide for the Administrator's approval the selected value of the MML for a specific HAP and the rationale for selecting the MML including all data and calculations used to determine the MML. The approved MML must be used in all applicable compliance demonstration calculations.
- (6) When using the MML determined using the procedures in paragraph (5)(ii) of this Condition or when using the MML determined using the procedures in paragraph (5)(i), except during set up, the analytical laboratory conducting the analysis must perform and meet the following quality assurance procedures each time a set of samples is analyzed to determine compliance.
- (i) Using the selected test method, analyze in triplicate the concentration of the specific HAP in a representative sample. The sample must contain the specific HAP at a concentration that is within a factor of two of the MML. If there are no samples in the set being analyzed that contain the specific HAP at an appropriate concentration, then a sample below the MML may be spiked to produce the appropriate concentration, or a sample at a higher level may be diluted. After spiking, the sample must contain the specific HAP within 50 percent of the MML. If dilution is used instead, the diluted sample must contain the specific HAP within 20 percent of the MML and must not be diluted by more than a factor of five.
 - (ii) Calculate the RSD using the measured HAP concentrations determined in paragraph (6)(i) of this Condition. If the RSD is less than 20 percent, then the laboratory is performing acceptably

[40 CFR 63.457(c)]

A.37. Detectable leak procedures. To measure detectable leaks for closed-vent systems as specified in **Condition A.6.**, the permittee shall comply with the following requirements:

- (1) Method 21, of Part 60, Appendix A-7; and
- (2) The instrument specified in Method 21 shall be calibrated before use according to the procedures specified in Method 21 on each day that leak checks are performed. The following calibration gases shall be used:
 - (i) Zero air (less than 10 parts per million by volume of hydrocarbon in air); and
 - (ii) A mixture of methane or n-hexane and air at a concentration of approximately, but less than, 10,000 parts per million by volume methane or n-hexane.

[40 CFR 63.457(d)]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.38. Negative pressure procedures. To demonstrate negative pressure at process equipment enclosure openings as specified in **Condition A.6.(b)**, the owner or operator shall use one of the following procedures:

- (1) An anemometer to demonstrate flow into the enclosure opening;
- (2) Measure the static pressure across the opening;
- (3) Smoke tubes to demonstrate flow into the enclosure opening; or
- (4) Any other industrial ventilation test method demonstrated to the Administrator's satisfaction.

[40 CFR 63.457(e)]

A.39. HAP concentration measurements. For purposes of complying with the requirements in §§63.443, 63.444, and 63.447, the owner or operator shall measure the total HAP concentration as one of the following:

- (1) As the sum of all individual HAPs; or
- (2) As methanol.

[40 CFR 63.457(f)]

A.40. Vent gas stream calculations. To demonstrate compliance with the mass emission rate, mass emission rate per megagram of ODP, and percent reduction requirements for vent gas streams specified in §§63.443, 63.444, 63.445, and 63.447, the owner or operator shall use the following:

- (1) The total HAP mass emission rate shall be calculated using the following equation:

$$E = K_2 \left[\sum_{j=1}^n C_j M_j \right] Q_s$$

Where:

E= Mass emission rate of total HAP from the sampled vent, kilograms per hour.

K₂ = Constant, 2.494×10⁻⁶ (parts per million by volume)⁻¹ (gram-mole per standard cubic meter) (kilogram/gram) (minutes/hour), where standard temperature for (gram-mole per standard cubic meter) is 20 °C.

C_j = Concentration on a dry basis of pollutant j in parts per million by volume as measured by the test methods specified in paragraph (b) of this section.

M_j = Molecular weight of pollutant j, gram/gram-mole.

Q_s = Vent gas stream flow rate (dry standard cubic meter per minute) at a temperature of 20 °C as indicated in paragraph (b) of this section.

n= Number of individual pollutants, i, summed to calculate total HAP.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.40. Continued:

(2) The total HAP mass emission rate per megagram of ODP shall be calculated using the following equation:

$$F = \frac{E}{P}$$

Where:

F= Mass emission rate of total HAP from the sampled vent, in kilograms per megagram of ODP.

E= Mass emission rate of total HAP from the sampled vent, in kilograms per hour determined as specified in paragraph (i)(1) of this section.

P= The production rate of pulp during the sampling period, in megagrams of ODP per hour.

(3) The total HAP percent reduction shall be calculated using the following equation:

$$R = \frac{E_i - E_o}{E_i} (100)$$

Where:

R= Efficiency of control device, percent.

E_i= Inlet mass emission rate of total HAP from the sampled vent, in kilograms of pollutant per hour, determined as specified in paragraph (i)(1) of this section.

E_o = Outlet mass emission rate of total HAP from the sampled vent, in kilograms of pollutant per hour, determined as specified in paragraph (i)(1) of this section.

[40 CFR 63.457(i)]

A.41. Liquid stream calculations. To demonstrate compliance with the mass flow rate, mass per megagram of ODP, and percent reduction requirements for liquid streams specified in **Conditions A.7. through A.12.**, the owner or operator shall comply with the following requirements:

(1) The mass flow rates of total HAP or methanol entering and exiting the treatment process shall be calculated using the following equations:

$$E_b = \frac{K}{n \times 10^6} \left(\sum_{i=1}^n V_{bi} C_{bi} \right)$$

$$E_a = \frac{K}{n \times 10^6} \left(\sum_{i=1}^n V_{ai} C_{ai} \right)$$

where:

E_b= Mass flow rate of total HAP or methanol in the liquid stream entering the treatment process, kilograms per hour.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.41. Continued:

E_a =	Mass flow rate of total HAP or methanol in the liquid exiting the treatment process, kilograms per hour.
K =	Density of the liquid stream, kilograms per cubic meter.
V_{bi} =	Volumetric flow rate of liquid stream entering the treatment process during each run i, cubic meters per hour, determined as specified in Condition A.38 .
V_{ai} =	Volumetric flow rate of liquid stream exiting the treatment process during each run i, cubic meters per hour, determined as specified in Condition A.38 .
C_{bi} =	Concentration of total HAP or methanol in the stream entering the treatment process during each run i, parts per million by weight, determined as specified in Condition A.38 .
C_{ai} =	Concentration of total HAP or methanol in the stream exiting the treatment process during each run i, parts per million by weight, determined as specified in Condition A.38 .
n =	Number of runs.

- (2) The mass of total HAP or methanol per megagram ODP shall be calculated using the following equation:

$$F = \frac{E_a}{P}$$

where:

F = Mass loading of total HAP or methanol in the sample, in kilograms per megagram of ODP.

E_a = Mass flow rate of total HAP or methanol in the wastewater stream in kilograms per hour as determined using the procedures in paragraph (1) of this Condition.

P = The production rate of pulp during the sampling period in megagrams of ODP per hour.

- (3) The percent reduction of total HAP across the applicable treatment process shall be calculated using the following equation:

$$R = \frac{E_b - E_a}{E_b} \times 100$$

where:

R = Control efficiency of the treatment process, percent.

E_b = Mass flow rate of total HAP in the stream entering the treatment process, kilograms per hour, as determined in paragraph (1) of this Condition.

E_a = Mass flow rate of total HAP in the stream exiting the treatment process, kilograms per hour, as determined in paragraph (1) of this Condition.

- (4) Compounds that meet the requirements specified in paragraphs (4)(i) or (ii) of this Condition are not required to be included in the mass flow rate, mass per megagram of ODP, or the mass percent reduction determinations.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.41. Continued:

- (i) Compounds with concentrations at the point of determination that are below 1 part per million by weight; or
- (ii) Compounds with concentrations at the point of determination that are below the lower detection limit where the lower detection limit is greater than 1 part per million by weight.

[40 CFR 63.457(j)]

A.42.a. Biological treatment system percent reduction and mass removal calculations. To demonstrate compliance with the condensate treatment standards specified in **Condition A.11.** and the monitoring requirements specified in **Condition A.18.**, the permittee shall use one of the procedures specified in paragraphs (1) or (2) of this Condition. Permittees using a nonthoroughly mixed open biological treatment system shall also comply with paragraph (3) of this Condition.

(1) *N/A- mill not using percent reduction method*

(2) *Mass removal methanol procedure.* For the purposes of complying with the condensate treatment requirements specified in **Condition A.11.**, the methanol mass removal shall be calculated using the following equation:

$$F = \left(\frac{F_b * (f_{bio}(MeOH))}{(1 + 1.087(r))} \right)$$

Where:

F= methanol mass removal (kg/Mg ODP).

F_b= inlet mass flow rate of methanol (kg/Mg ODP) determined using the procedures in **Condition A.41.(2).**

F_{bio}(MeOH)= the fraction of methanol removed in the biological treatment system. The site-specific biorate constants shall be determined using the appropriate procedures specified in Appendix C of Part 63. The permittee shall use a factor of 88.0 (baseline condition) for 63.446 compliance purposes.

r = ratio of the sum of acetaldehyde, methyl ethyl ketone, and propionaldehyde mass to methanol mass determined using the below procedures.

$$r = \frac{F_{(nonmethanol)}}{F_{(methanol)}}$$

F_(nonmethanol) = The sum of acetaldehyde, methyl ethyl ketone, and propionaldehyde mass flow rates (kg/Mg ODP) entering the biological treatment system determined using the procedures in **Condition 41.(2).**

F_(methanol) = The mass flow rate (kg/Mg ODP) of methanol entering the system determined using the procedures in **Condition 41.(2).**

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.42.a. Continued:

- (3) The owner or operator of a nonthoroughly mixed open biological treatment system using the monitoring requirements specified in **Condition A.20.b.(3)** shall follow the procedures specified in section III.B.1 of Appendix E of Part 63 to determine the biorate constant, K_s , and characterize the open biological treatment system during the initial and any subsequent performance tests.

[40 CFR 63.457(l); Initial Performance Test dated March 19, 2007]

A.42.b. Biological treatment system percent reduction and mass removal calculations. If the Inlet and Outlet Concentration Measurement Procedure (Procedure 3) in Appendix C of Part 63 is used to determine the fraction of HAP compounds degraded in the biological treatment system as specified in **Condition A.42.a.**, conduct the sampling and archival requirements specified in paragraphs (1) and (2) of this Condition.

- (1) Obtain daily inlet and outlet liquid grab samples from each biological treatment unit to have HAP data available to perform quarterly performance test specified in **Condition A.18.** and the compliance tests specified in **Condition A.20.b.**
- (2) Store the samples as specified in **Condition A.40.** until after the results of the soluble BOD₅ test required in paragraph (2)(i) of this Condition are obtained. The storage requirement is needed since the soluble BOD₅ test requires 5 days or more to obtain results. If the results of the soluble BOD₅ test are outside of the range established during the initial performance test, then the archive sample shall be used to perform the mass removal determination.
 - (i) On a daily basis, monitor the composite daily sample of outlet soluble BOD₅ concentration to monitor for maximum daily and maximum monthly average.

[40 CFR 63.453(j)(1)(ii)]

A.43. Condensate segregation procedures. The following procedures shall be used to demonstrate compliance with the condensate segregation requirements specified in **Condition A.8.**

- (1) N/A -*will not using percent reduction method*
- (2) To demonstrate compliance with the percent mass requirements specified in **Condition A.8.** the procedures specified in paragraphs (2)(i) through (ii) of this Condition shall be performed.
 - (i) Determine the total HAP mass contained in the high-HAP fraction condensates from each digester system, each turpentine recovery system, and each evaporator system¹ and the total condensates streams from the HVLC collection system and the LVHC collection system, using the procedures specified in **Conditions A.36. and A.41.**
 - (ii) Compliance with the segregation requirements specified in **Condition A.8. is** demonstrated if the total HAP mass determined in paragraph (2)(i) of this Condition is equal to or greater than the appropriate mass requirements specified in **Condition A.8.**

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.43. Continued:

¹ Pursuant to 40 CFR 63.446(b), equipment systems for the purpose of this condition shall include: each digester system, each turpentine recovery system, each evaporator system condensate from: a) the vapors from each stage where weak liquor is introduced (feed stages) and b) each evaporator vacuum system for each stage where weak liquor is introduced (feed stages).

[40 CFR 63.457(m)]

A.44. Open biological treatment system monitoring sampling storage. The inlet and outlet grab samples required to be collected in **Condition A.42.b.** shall be stored at 4 °C (40 °F) to minimize the biodegradation of the organic compounds in the samples.

[40 CFR 63.457(n)]

A.45. Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

[40 CFR 63.457(o)]

§63.456 Affirmative defense for violation of emission standards during malfunction.

A.46. In response to an action to enforce the standards set forth in **Condition A.3.** and **Condition A.4., Conditions A.8., A.9., A.10., and A.11., 40 CFR 63.447(b)** or **Condition A.6.(c)**, the owner or operator may assert an affirmative defense to a claim for civil penalties for violations of such standards that are caused by malfunction, as defined at 40 CFR 63.2. Appropriate penalties may be assessed, however, if the owner or operator fails to meet the burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief.

(a) To establish the affirmative defense in any action to enforce such a standard, the owner or operator must timely meet the reporting requirements in paragraph (b) of this condition, and must prove by a preponderance of evidence that:

(1) The violation:

- (i) Was caused by a sudden, infrequent, and unavoidable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner, and
- (ii) Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and
- (iii) Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and
- (iv) Was not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and

(2) Repairs were made as expeditiously as possible when a violation occurred. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

Condition A.46. Continued:

- (3) The frequency, amount and duration of the violation (including any bypass) were minimized to the maximum extent practicable; and
 - (4) If the violation resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and
 - (5) All possible steps were taken to minimize the impact of the violation on ambient air quality, the environment and human health; and
 - (6) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and
 - (7) All of the actions in response to the violation were documented by properly signed, contemporaneous operating logs; and
 - (8) At all times, the affected source was operated in a manner consistent with good practices for minimizing emissions; and
 - (9) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the violation resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of any emissions that were the result of the malfunction.
- (b) *Report.* The owner or operator seeking to assert an affirmative defense shall submit a written report to the Administrator with all necessary supporting documentation, that it has met the requirements set forth in paragraph (a) of this condition. This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmative defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.

[40 CFR 63.456]

40 CFR 63.447 Clean condensate alternative.

A.47. CCA Technology. The Permittee has chosen to comply with the NESHAP Subpart S MACT I, Phase 2 required total HAP reductions from the Brown Stock Washer System Nos. 1 and 2 and the Oxygen Delignification System through the use of the CCA Technology.

These emission reductions were calculated to be 0.08 lbs of total HAP per oven dried ton of pulp for the brownstock washing systems, and 0.64 lbs of total HAP per oven dried ton of pulp for the Oxygen Delignification System. This is in addition to the reduction of total HAP in the pulping condensates reduction requirements listed in 40 CFR 63.446 (i.e., 10.2 lbs of total HAP per oven dried ton of pulp).

[40 CFR 63.447; Rule 62-204.800, F.A.C.; Title V Operation Permit No. 1230001-044-AV]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection A: Pulping Area/System MACT I

A.48. Compliance with the total HAP reductions through the use of the CCA technology requires the HAP reductions be calculated in pounds per ton of Oven Dried Pulp (ODP) basis and HAP emissions shall be measured according to the appropriate procedures stated in 40 CFR 63.457 .

[40 CFR 63.447(c), 40 CFR 63.441(def), and Rule 62-204.800, F.A.C.]

A.49. The Permittee shall comply with the CCA (40 CFR 63.447), Monitoring (40 CFR 63.453), Recordkeeping (40 CFR 63.454), Reporting (40 CFR 63.455), Affirmative defense for violation of emission standards during malfunction (40 CFR 63.456), Testing Requirements, Methods, and Procedures (40 CFR 63.457), and Table 1 to Subpart S of Part 63 -- General Provisions Applicability to Subpart S. These requirements are stated in 40 CFR 63 Subpart S- National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection B: Modification of Permit No. 1230001-011-AC

This permit makes the changes identified below with a strikethrough and under line font to Specific Condition No. 14 of Permit No. 1230001-011-AC:

Standards for enclosures and closed-vent systems:

14. Each enclosure and closed-vent system specified in Specific Conditions Nos. 2 and 7 for capturing and transporting vent streams that contain HAP shall meet the following requirements.
- (a) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in Specific Condition No. 25. Each enclosure or hood opening closed during the initial performance test specified in Specific Condition No. 22 shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
 - (b) Each component of the closed-vent system used to comply with Specific Conditions Nos. 2 and 7 that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in Specific Condition No. 24.
 - (c) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443 and §§63.445 shall comply with one of the following requirements:
 - (1) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The continuous monitor will measure the valve position of the vent valve as a flow indicator. All valve positions other than closed will indicate flow in the bypass line; or
 - (2) For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a chained and locked closure mechanism in such a way that the valve or closure mechanism cannot be opened without recording and reporting the valve opening or with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

Note: Buckeye plans on demonstrating compliance with Specific Condition No.14(c)(1) by monitoring computer (DCS) controlled automatic valves with a continuous indication of any venting and the capability to record venting periods at least once every 15 minutes on each bypass line. The bypass lines are (2) two ten-inch vent collection lines located in the pulping and power operating departments.

[40 CFR 63.450]

SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

Subsection C: Modification of Permit No. 1230001-014-AC

This permit makes the changes identified below with a strikethrough and under line font to Specific Condition No. 5 of Permit No. 1230001-014-AC:

Standards for enclosures and closed-vent systems:

5. Each enclosure and closed-vent system specified in Specific Condition No. 3 for capturing and transporting vent streams that contain HAP shall meet the following requirements no later than April 16, 2006.
- (a) Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in Specific Condition No. 10.
 - (b) Each component of the closed-vent system used to comply with Specific Condition No. 3 that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in Specific Condition No. 9.
 - (c) Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in §§63.443 and §§63.445 shall comply with one of the following requirements:
 - (1) On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The continuous monitor will measure the valve position of the vent valve as a flow indicator. All valve positions other than closed will indicate flow in the bypass line; or
 - (2) For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a chained and locked closure mechanism in such a way that the valve or closure mechanism cannot be opened without recording and reporting the valve opening or with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.

Note: Buckeye plans on demonstrating compliance with Specific Condition No.5(c)(1) by monitoring computer (DCS) controlled automatic valves with a continuous indication of any venting and the capability to record venting periods at least once every 15 minutes on each bypass line. The bypass lines are (2) two ten-inch vent collection lines located in the pulping and power operating departments.

[40 CFR 63.450]