

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Piedmont Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

Smurfit-Stone Container Enterprises, Inc. – West Point
West Point, Virginia
Permit No. PRO-40126

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Smurfit-Stone Container Enterprises, Inc. has applied for a Title V Operating Permit for its West Point facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact: _____ Date: _____

Engineer/Permit Contact: _____ Date: _____

Air Permit Manager: _____ Date: _____

Regional Permit Manager: _____ Date: _____

FACILITY INFORMATION

Permittee/Facility

Smurfit-Stone Container Enterprises, Inc. – West Point
P.O. Box 100
19th and Main Streets
West Point, Virginia 23181

County-Plant Identification Number: 101-00001

SOURCE DESCRIPTION

NAICS 322130 – Paperboard Mill
SIC 2631 – Paperboard Mill

This facility operates a Kraft pulp and paper mill which produces corrugated medium and unbleached and bleached linerboard on three paper machines using a combination of recycled paper, virgin unbleached softwood, and unbleached or bleached hardwood.

There are 11 major parts of this facility as listed in the application: 1) Power House Process Area; 2) Digester Systems Area; 3) Pulp Washing Area; 4) Caustic Recovery Process Area; 5) Chemical Recovery Process Area; 6) Evaporator System Area; 7) Turpentine & Tall Oil Plant Area; 8) Bleach Plant Process Area; 9) Paper Mill Process Area; 10) Wastewater Treatment Plant; and 11) Miscellaneous Area, including a Pulping Process Condensate Collection System.

The facility is a Title V major source of SO₂, CO, NO_x, PM, PM-10, VOC and HAPs. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility was previously permitted under the following effective permits:

NSR Permits	Issued	Last Amended
HVLC Gas Collection	2/1/06	
Landfill Gas	10/7/06	
No. 4 Recovery Furnace	5/14/75	
State Operating Permit		
NO _x Budget Trading Program	6/21/04	
PSD Permit		
No. 5 Recovery Furnace	3/1/91	7/6/04
No. 10 Power Boiler	10/7/80	4/2/84
Lime Kiln No. 2	10/26/82	

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted on September 15, 2005. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, were evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

On November 15-17, 2005 EPA conducted a site visit and performed an inspection. The inspection evaluated various mill operations and ongoing compliance with the Consent Decree that was issued by EPA to Smurfit-Stone on November 4, 2004. Several conditions of the Consent Decree have been covered in the HVLC NSR permit, however, additional conditions have been added to the Title V permit in the Compliance Plan Section.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
PH06	PH06-01	No. 6 Power Boiler (1942)	242 MMBtu/hr	- Multiclones	PH06-CD1	PM, PM ₁₀	Shut down or re-permit per Condition V.G.23 of the 11/4/04 Consent Decree
PH08	PH08-02	No. 8 Power Boiler (1964)	553 MMBtu/hr	- Research Cottrell ESP - Concentric firing system (SOFA)	--	PM, PM ₁₀ , Particulate HAPs, NO _x	7/6/2004
PH10	PH10-04 PH10-05 PH10-06	No. 10 Power Boiler (1981)	659 MMBtu/hr	- Research Cottrell ESP - Multiclones	--	PM, PM ₁₀ , Particulate HAPs	4/2/1984
Digester Systems Area							
DS01	PH08-02 PH10-04	Batch Digester System (1950)	1,100 ADTP/day	LVHC System	LV01	Volatile HAPs	--
DS03	PH08-02 PH10-04	Kamyr Continuous Digester System (1963)	1,200 ADTP/day	LVHC System	LV01	Volatile HAPs	--

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Pulp Washing Area							
PW01	PH08-02 PH10-04	No. 1 Pulp Washing System (1963)	1,200 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW02	PH08-02 PH10-04	No. 2 Pulp Washing System (1971)	830 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW03	PH08-02 PH10-04	No. 3 Pulp Washing System (1982)	600 ADTP/day	HVLC System	HV01	Volatile HAPs	2/1/2006
PW05	--	No. 1 Pulp Washing System Non-MACT Equipment	--	--	--	--	--
Causticizing Area							
CZ02	CZ02-17	No. 15 Lime Slaker (1974)	172,800 tons CaO/yr	- AirPol Venturi Scrubber	CZ02-CD	PM, PM ₁₀	--
CZ03	CZ03-18	No. 20 Lime Slaker (1982)	172,800 tons CaO/yr	- Ducon Size 60 Type UW4 Venturi Scrubber	CZ03-CD	PM, PM ₁₀	7/6/2004
CZ11	CZ11-15	No. 1 Lime Kiln (1956)	85 MMBtu/hr 263 tons CaO/day	- Peabody Venturi Scrubber - Demister	CZ11-CD1 CZ11-CD2	PM, PM ₁₀ , Particulate HAPs	--
CZ12	CZ12-16	No. 2 Lime Kiln (1982)	90 MMBtu/hr 209 tons CaO/day	- AirPol Venturi Scrubber - Cyclone - Demister	CZ12-CD1 CZ12-CD2 CZ12-CD3	PM, PM ₁₀ , Particulate HAPs	6/10/1982
Chemical Recovery Area							
CR01	CR01-07	Combustion Engineering V2R No. 4 Recovery Furnace (1975)	616.5 MMBtu/hr	- Environmental Elements Dry bottom ESP	CR01-CD1	PM, PM ₁₀ , Particulate HAPs	7/6/2004
CR02	CR02-12	No. 4 North Smelt Dissolving Tank (1975)	35,542 gallons	- Flex Kleen OS-90 Venturi Scrubber - Indusco Mist Eliminator	CR02-CD	PM, PM ₁₀ , TRS, Particulate HAPs	7/6/2004
CR03	CR03-13	No. 4 South Smelt Dissolving Tank (1975)	35,542 gallons	- Flex Kleen OS-90 Venturi Scrubber - Indusco Mist Eliminator	CR03-CD	PM, PM ₁₀ , TRS, Particulate HAPs	7/6/2004

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
CR05	CR05-10	Babcock & Wilcox No. 5 Recovery Furnace (1991)	832.3 MMBtu/hr with 75% BLS 769.3 MMBtu/hr with 68% BLS 600 MMBtu/hr with No.2 distillate oil/No. 6 residual oil	- Flakt FAA dry bottom ESP	CR05-CD	PM, PM ₁₀ , Particulate HAPs	7/6/2004
CR06	CR06-14	No. 5 Smelt Dissolving Tank (1991)	45,463 gallons	- Amerex Type U4 wetted fan Scrubber	CR06-CD	PM, PM ₁₀ , TRS, Particulate HAPs	7/6/2004
Evaporator Systems Area							
EV02	PH08-02 PH10-04	Evaporator System (4 evaporators; B-E lines dated 1939, 1956, 1977, 1991)	2 at 704,550 lbs H ₂ O/hr 1at 324,000 lbs H ₂ O/hr 1at 662,000 lbs H ₂ O/hr	LVHC System	LV01	Volatile HAPs	--
EV05	Fugitive	E-Line Evaporator Cooling Tower	36 MMGal/day	--	--	--	--
Turpentine & Tall Oil Plant							
TT02	TT02-143	Tall Oil System (1957)	32,690 tons Tall Oil/yr	- Schutte & Koerting FIG.4010 Fume Scrubber	TT02-CD	Fumes	--
TT03	PH08-02 PH10-04	Turpentine System (1957)	--	LVHC System	LV01	Volatile HAPs	--
Bleach Plant Area							
BP01	BP01-88	Bleach Plant MACT Equipment (1984)	1,125 tons/day	- Packed wet scrubber	BP01-CD1 BP01-CD2	Chlorine-containing compounds	--
BP02	BP02-89	Methanol Storage Tank (1993)	15,000 gal	--	--	--	--

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Paper Mill Area							
PM01	PM01-19 thru PM01-40	Pussey & Jones/KMW No. 1 Paper Machine (1930)	600 tons/day	--	--	--	--
PM02	PM02-41 thru PM02-64	Beloit/Valmet No. 2 Paper Machine (1964)	1,345 tons/day	--	--	--	--
PM03	PM03-65 thru PM03-86	Voith/Valmet No. 3 Paper Machine (1985)	1,345 tons/day	--	--	--	--
PM05	PM05-87 PM05-90	PM Starch Handling (1989)	--	- Bin Vent Filters	PM05-CD1 PM05-CD2	PM, PM ₁₀	--
Wastewater Treatment Plant							
WT01	WT01-185-190	Wastewater Treatment Plant including UNOX Aeration System (1974-1996)	23 MMGal/day	--	--	Volatile HAPs	--
WT05	Fugitive	UNOX Cooling Tower	23 MMGal/day	--	--	--	--
Miscellaneous							
HV01	PH08-02 PH10-04	HVLC System (2005)	--	- No. 8 Power Boiler (Primary Control) - No. 10 Power Boiler (Secondary Control)	PH08-CD1 PH08-CD2 PH08-CD3 PH10-CD	Volatile HAPs	2/1/2006
LV01	PH08-02 PH10-04	LVHC System (1972)	--	- No. 8 Power Boiler (Primary Control) - No. 10 Power Boiler (Secondary Control)	PH08-CD1 PH08-CD2 PH08-CD3 PH10-CD	Volatile HAPs	7/6/2004
CC01	WT01-185-190	Condensate Collection System (1972, changes to address MACT I compliance occurred in 1996)	--	- Wastewater Treatment Plant	CC01-CD	Volatile HAPs	--

EMISSIONS INVENTORY

A copy of the 2005 annual emission update is attached. Emissions are summarized in the following tables.

2005 Actual Emissions

2005 Criteria Pollutant Emission in Tons/Year					
Emission Unit	VOC	CO	SO ₂	PM ₁₀	NO _x
Power Boiler #8	0.68	34.8	3,098.9	27.2	968.4
Power Boiler #10	44.2	540.5	262.4	30.8	511.5
Recovery Furnace #4	65.1	1,571.4	515.9	75.0	210.7
Recover Furnace #5	46.7	862.9	27.1	10.2	737.2
Lime Kiln #1	0.89	0.43	0.87	22.96	20.58
Lime Kiln #2	0.79	0.38	0.07	62.16	6.19
Total	158.36	3,010.41	3,905.24	228.32	2,454.57

2005 Facility Hazardous Air Pollutant Emissions

Pollutant	2005 Hazardous Air Pollutant Emission in Tons/Yr
HAPs that are non-VOC	122
VOC HAPs	780.7

EMISSION UNIT APPLICABLE REQUIREMENTS

A. Power House Process Area

Limitations

This section of the Title V permit deals with the main boilers at the facility. No. 8 and No. 10 Power Boilers are the only two operational boilers while No. 6 Power Boiler is shutdown. No. 6 Power Boiler was included into the equipment list and this section for background purposes only. No limitation conditions are listed since the unit was shutdown because of the Consent Decree. Conditions 1-3 are part of the PSD permits dated 7/6/04 and 4/2/84, which detail the combustion practices and controls on No. 8 and No. 10 Power Boilers. The approved fuels for No. 8 and No. 10 Power Boilers are identified in conditions 4 and 5 and limitations on the fuels themselves are in conditions 6, 7, and 8. These conditions are from the HVLC NSR permit (dated 2/1/06) and the 4/2/84 PSD permit. Conditions 9 and 10 are from the HVLC NSR permit and restrict the overall emissions from No. 8 Power Boiler and the contribution of SO₂ on No. 10 Power Boiler not to exceed exemption levels. Exceeding this limit would require a SO₂ BACT determination to

increase the contribution to 39 tons. Currently a permit application is being processed for such an increase in condition 10. Condition 11 is the limitation of LVHC gases combusted in either unit and is a condition taken directly from the 7/6/04 PSD permit. Conditions 12-14 are the specific emission limits for both No. 8 and No. 10 Power Boilers. These limits have been derived from the following:

No. 8 Power Boiler:

Criteria Pollutant	Emission limit	Reference
Sulfur Dioxide	4,201 tons/yr	NSR permit dated 2/1/06
Nitrogen Oxides (as NO ₂)	0.52 lbs/MMBtu	Consent Decree dated 11/4/04
Carbon Monoxide	68.6 lbs/hr	PSD permit dated 7/6/04
	300.3 tons/yr	PSD permit dated 7/6/04

No. 10 Power Boiler:

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.1 lbs/MMBtu	NSPS, Subpart D and PSD permit dated 4/2/84
	65.9 lbs/hr	PSD permit dated 4/2/84
Sulfur Dioxide	0.8 lbs/MMBtu	NSPS, Subpart D and PSD permit dated 4/2/84
	527.2 lbs/hr	PSD permit dated 4/2/84
	2,309.1 tons/yr	NSR permit dated 2/1/06
Nitrogen Oxides (as NO ₂)	0.3 lbs/MMBtu	NSPS, Subpart D and PSD permit dated 4/2/84
	197.7 lbs/hr	PSD permit dated 4/2/84
Carbon Monoxide	0.23 lbs/MMBtu	PSD permit dated 4/2/84
Volatile Organic Compounds	0.23 lbs/MMBtu	PSD permit dated 4/2/84
Opacity limit	20%, 27%	NSPS, Subpart D and PSD permit dated 4/2/84

Conditions 16 and 17 are incorporation of requirements by reference conditions.

In addition, both boilers have been physically changed to handle the gases from the HVLC and LVHC systems; however, this does not meet the definition of modification for this NSPS.

The following Federal requirements have been determined to be applicable:

40 CFR 60 Subpart D -- Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.
 (No. 10 Power Boiler only)

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 40 Part I: Special Provisions
 9 VAC 5 Chapter 40 Article 13: Emissions Standards for Pulp and Paper Mills

9 VAC 5 Chapter 80	Part I: Permits for New and Modified Sources
9 VAC 5 Chapter 80	Article 1: Federal Operating Permits for Stationary Sources
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 80	Article 4: Insignificant Activities
9 VAC 5 Chapter 80	Article 8: Permits for Major Stationary Sources and Major Modifications Locating in Prevention of Significant Deterioration Areas

Monitoring

No. 8 and No. 10 Power Boilers are required to operate continuous emission monitors (CEMS) to measure and record SO₂ emissions and NO_x emissions, as according to the Consent Decree dated 11/4/04. Each CEMS must be maintained in accordance with 40 CFR 60 requirements. A continuous monitoring system for opacity (COMS) is required for No. 10 Power Boiler, as stated in NSPS, Subpart D and PSD permit dated 4/2/84. The SO₂ monitor for No. 8 Power Boiler is used to show direct compliance with condition 9.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

1. All fuel supplier certifications, including fuel oil analyses for the No. 10 Power Boiler.
2. SO₂ emissions from No. 8 Power Boiler as well as SO₂ contributions when HVLC is burned in No. 10 Power Boiler.
3. Monthly emissions calculations for SO₂ from the No. 10 Power Boiler.
4. Results of all stack tests, including the test to determine the emission rate of SO₂ resulting from the combustion of HVLC gases in No. 10 Power Boiler
5. Semi-annual emission reports from the combustion of HVLC – NCGs
6. Plan for minimizing CO emissions and any other emission increases that may result from the use of a concentric firing system (SOFA) on No. 8 Power Boiler.
7. Maintain the percentage of oil used for the No. 10 Power Boiler.
8. Maintain records of the fuel analysis
9. Scheduled and unscheduled maintenance and operator training for the No. 8 Power Boiler, No. 10 Power Boiler, and associated control devices installed on these emission units.

Testing

The permit does not require source tests. The Department and EPA has the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The reporting section identifies opacity, SO₂, and NO_x for excessive emission reporting on No. 10 Power Boiler (as stated in NSPS, Subpart D).

B. Kraft Pulping and Bleaching Systems Area

Limitations

This section of the Title V permit deals with the digester systems, pulp washing systems, evaporator systems, turpentine system, bleach plant, waste water treatment, and the associated NCG collection

systems. Conditions 1-4 detail how the emissions from the effected unit are collected and combusted. These conditions are requirements from the HVLC NSR permit, the Consent Decree, and the 7/6/04 PSD permit. Conditions 5-8 are directly from 40 CFR 63 Subpart S. These conditions were placed into the Title V to more accurately detail regulations which are applicable to emission units in this section. No permit underlying has been issued with these requirements. The pulp washer and evaporator line E emissions are routed to the power boilers for combustion. The boilers combustion characteristics meet the requirements set in 40 CFR 60.283(a)(1)(iii); therefore, no additional limit conditions were placed in the permit. Other emission units in this section have their emissions collected by the HVLC or LVHC systems and routed to the boiler for combustion; therefore, emissions from these units are included into the boiler emissions.

The following Federal requirements have been determined to be applicable:

40 CFR 60 Subpart BB -- Standards of Performance for Kraft Pulp Mills.
(Evaporator Line E only)

40 CFR 63 Subpart S -- National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry.
(The pulp washing systems, digester systems, turpentine recovery system, evaporator systems, HVLC collection system, the LVHC collection system, and the wastewater treatment plant (WWTP))

40 CFR 63 Subpart RR -- National Emission Standards for Individual Drain Systems
(The pulp washing systems, digester systems, turpentine recovery system, evaporator systems, HVLC collection system, the LVHC collection system, and the wastewater treatment plant (WWTP))

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5 Chapter 40	Part I: Special Provisions
9 VAC 5 Chapter 40	Article 13: Emissions Standards for Pulp and Paper Mills
9 VAC 5 Chapter 80	Part I: Permits for New and Modified Sources
9 VAC 5 Chapter 80	Article 1: Federal Operating Permits for Stationary Sources
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 80	Article 4: Insignificant Activities
9 VAC 5 Chapter 80	Article 8: Permits for Major Stationary Sources and Major Modifications Locating in Prevention of Significant Deterioration Areas

Monitoring

Conditions 1 and 2 were included directly from the 7/6/04 PSD permit to maintain the existing control system on the bleach plant. The scrubbed airflow still is routed to the boiler for combustion. Conditions 4-6 were added directly from the MACT, Subpart S for additional clarity for maintaining the venting system applicable to the various emission units.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

1. Records of the Bleach Plant scrubber control system
2. Records of the collection and vent systems

Testing

The permit does require source test of the UNOX system to determine a 92% efficiency. In addition, the Department and EPA has the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The facility is to submit semi-annual reports when there are issues with the HVLC collection system when venting to the atmosphere. The section also details the method of complying with the treatment system outlined in 40 CFR 63 Subpart S. If the facility decides to change the method of compliance then it will need to report using condition 3 procedures.

C. Caustic and Chemical Recovery Process Areas

Limitations

This section of the Title V permit deals with the lime slakers, lime kilns, recovery furnaces, and smelt dissolving tanks. No. 2 Lime Kiln was permitted under a 6/10/82 PSD permit and No. 5 recovery furnace is permitted under the 7/6/04 PSD permit. Conditions from these permits were placed into this section as applicable requirements. Most of the emission limits for the units in this section were developed with the facility adopted limits associated with 40 CFR 63 Subpart MM (MACT II Bubble Rule). No underlying permit has been issued with these limits; therefore the limits were taken from the testing done at the facility on May 27, 2004. Conditions 28 and 29 were added to clarify the determination of why the furnaces were not applicable to 40 CFR 60 Subpart D and Db (see documentation attached).

The emission limits for the emission units were derived from the following:

No. 20 Slaker

Criteria Pollutant	Emission limit	Reference
Particulate Matter	12 lbs/hr	PSD permit dated 7/6/04
	50 tons/yr	PSD permit dated 7/6/04
PM-10	12 lbs/hr	PSD permit dated 7/6/04
	50 tons/yr	PSD permit dated 7/6/04

No. 1 Lime Kiln

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.20 gr/dscf @ 10%O ₂	MACT, Subpart MM (MACT II "Bubble Rule")
	42.8 lbs/hr	MACT, Subpart MM (MACT II "Bubble Rule")
	182.3 tons/yr	MACT, Subpart MM (MACT II "Bubble Rule")
	20 ppm by volume on a	Existing Source Rule 4-13 (in State

TRS	dry basis corrected to 10% oxygen	Only Conditions in Title V)
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No. 2 Lime Kiln

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.13 gr/dscf @ 10%O ₂	NSPS, Subpart BB, MACT, Subpart MM (MACT II “Bubble Rule”), and PSD permit dated 6/10/82 amended 10/26/82
	24.4 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	103.9 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
TRS	8 ppm @ 10% O ₂	NSPS, Subpart BB and PSD permit dated 6/10/82 amended 10/26/82
	1.7 lbs/hr	PSD permit dated 6/10/82 amended 10/26/82
	7.2 tons/yr	PSD permit dated 6/10/82 amended 10/26/82

No. 4 recovery furnace

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.035 gr/dscf @ 8%O ₂	MACT, Subpart MM (MACT II “Bubble Rule”)
	72.6 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	309.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
PM-10	72.6 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	309.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
Sulfur Dioxide	338.3 lbs/hr	PSD permit dated 7/6/04
	1,441 tons/yr	PSD permit dated 7/6/04
Nitrogen Oxides (as NO ₂)	155 lbs/hr	PSD permit dated 7/6/04
	660 tons/yr	PSD permit dated 7/6/04
Carbon Monoxide	574 lbs/hr	PSD permit dated 7/6/04
	2,446 tons/yr	PSD permit dated 7/6/04
Volatile Organic Compounds	101.1 lbs/hr	PSD permit dated 7/6/04
	431 tons/yr	PSD permit dated 7/6/04
TRS	5 ppm _{dv} @ 8% O ₂	PSD permit dated 7/6/04
	7.5 lbs/hr	PSD permit dated 7/6/04
	32 tons/yr	PSD permit dated 7/6/04

No. 4 north smelt dissolving tank

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.75 lbs/equivalent tons of air dried pulp	Existing Rule 4-13 and PSD permit dated 7/6/04
	0.045 gr/dscf	MACT, Subpart MM (MACT II “Bubble Rule”)
	5.0 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	21.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
PM-10	5.0 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	21.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)

No. 4 south smelt dissolving tank

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.75 lbs/equivalent tons of air dried pulp	Existing Rule 4-13 and PSD permit dated 7/6/04
	0.110 gr/dscf	MACT, Subpart MM (MACT II “Bubble Rule”)
	13.2 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	56.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
PM-10	13.2 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	56.3 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)

No. 4 north and south smelt dissolving tanks

Criteria Pollutant	Emission limit	Reference
Sulfur Dioxide	0.2 lbs/ton of air dried pulp	PSD permit dated 7/6/04
	5 lbs/hr	PSD permit dated 7/6/04
	22 tons/yr	PSD permit dated 7/6/04
TRS	0.033 lbs/ton Black Liquor Solids, as H ₂ S	Existing Rule 4-13 and PSD permit dated 7/6/04
	1 lbs/hr	PSD permit dated 7/6/04
	3 tons/yr	PSD permit dated 7/6/04

No. 5 recovery furnace

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.030 gr/dscf @ 8%O ₂	MACT, Subpart MM (MACT II “Bubble Rule”)
	53.3 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	227.1 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
PM-10	53.3 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	227.1 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
Sulfur Dioxide	145 ppm _{dv} @ 8% O ₂	PSD permit dated 7/6/04
	301 lbs/hr	PSD permit dated 7/6/04
	1,284 tons/yr	PSD permit dated 7/6/04
Nitrogen Oxides (as NO ₂)	112 ppm _{dv} @ 8% O ₂	PSD permit dated 7/6/04
	177 lbs/hr	PSD permit dated 7/6/04
	754 tons/yr	PSD permit dated 7/6/04
Carbon Monoxide	250 ppm _{dv} @ 8% O ₂	PSD permit dated 7/6/04
	227 lbs/hr	PSD permit dated 7/6/04
	969 tons/yr	PSD permit dated 7/6/04
Volatile Organic Compounds	0.048 lbs/MMBtu	PSD permit dated 7/6/04
	34 lbs/hr	PSD permit dated 7/6/04
	146 tons/yr	PSD permit dated 7/6/04
TRS	5 ppm _{dv} @ 8% O ₂	PSD permit dated 7/6/04
	6 lbs/hr	PSD permit dated 7/6/04
	24 tons/yr	PSD permit dated 7/6/04

No. 5 smelt dissolving tank

Criteria Pollutant	Emission limit	Reference
Particulate Matter	0.2 lbs/ton Black Liquor Solids (dry weight)	NSPS, Subpart BB and PSD permit dated 7/6/04
	0.057 gr/dscf	MACT, Subpart MM (MACT II “Bubble Rule”)
	7.9 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	33.8 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)
PM-10	7.9 lbs/hr	MACT, Subpart MM (MACT II “Bubble Rule”)
	33.8 tons/yr	MACT, Subpart MM (MACT II “Bubble Rule”)

Sulfur Dioxide	0.2 lbs/ton of air dried pulp	PSD permit dated 7/6/04
	8 lbs/hr	PSD permit dated 7/6/04
	36 tons/yr	PSD permit dated 7/6/04
TRS	0.0168 lbs/ton Black Liquor Solids (dry weight)	PSD permit dated 7/6/04
	1 lbs/hr	PSD permit dated 7/6/04
	4 tons/yr	PSD permit dated 7/6/04

Caustic and Chemical Recovery System – All limits from MACT, Subpart MM (MACT II “Bubble Rule”).

<u>The following Federal requirements have been determined to be applicable:</u>	
40 CFR 60 Subpart BB -- Standards of Performance for Kraft Pulp Mills (No. 2 Lime Kiln, No. 5 recovery furnace, and No. 5 smelt dissolving tank)	
40 CFR 63 Subpart MM -- National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills (No. 1 and No. 2 Lime Kilns, No. 4 recovery furnace and No. 4 north and south smelt dissolving tanks, No. 5 recovery furnace, and No. 5 smelt dissolving tank)	
The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:	
9 VAC 5 Chapter 40	Part I: Special Provisions
9 VAC 5 Chapter 40	Article 13: Emissions Standards for Pulp and Paper Mills
9 VAC 5 Chapter 80	Part I: Permits for New and Modified Sources
9 VAC 5 Chapter 80	Article 1: Federal Operating Permits for Stationary Sources
9 VAC 5 Chapter 80	Article 2: Permit Program Fees for Stationary Sources
9 VAC 5 Chapter 80	Article 4: Insignificant Activities
9 VAC 5 Chapter 80	Article 8: Permits for Major Stationary Sources and Major Modifications
	Locating in Prevention of Significant Deterioration Areas

Monitoring

The facility is required to have a continuous opacity monitoring system (COMS) to monitor opacity from Recovery Furnace No. 4, a continuous emission monitoring system (CEMS) to monitor TRS emission from Lime Kiln No. 2, and a continuous emission monitoring system (CEMS) to monitor SO₂, NO₂, TRS and opacity (COMS) from Recovery Furnace No. 5. Operating parameters will also be measured according to 40 CFR 63 Subpart MM.

The facility shall maintain and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the pressure drop across the scrubbers that control the No. 1 Lime Kiln, No. 2 Lime Kiln, No. 4 north smelt dissolving tank, and No. 4 south smelt dissolving tank. The facility shall also maintain and operate a continuous parameter monitoring system (CPMS) in accordance with the EPA approved alternative monitoring procedure for No. 5 smelt dissolving tank that can be used to determine and record the scrubber flow to the fan.

Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

1. Amount of fuel combusted in No. 4 and No. 5 recovery furnaces
2. TRS and oxygen concentrations from No. 5 recovery furnace and No. 2 Lime Kiln
3. Maintain records including operational parameters and plans
4. Maintain records of the annual fossil fuel capacity factor for No. 4 and No. 5 recovery furnace

Testing

The permit does not require source testing. The Department and EPA has the authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

The facility is to report excess emissions from No. 5 recovery furnace for NO_x, TRS, and SO₂. The facility will have to report any TRS emission from No. 2 Lime Kiln above 8 ppm by volume on a semi-annual period.

D. Additional Facility Wide Conditions

Limitations

Three additional conditions from the 7/6/04 permit were placed into the facility wide section since the specific conditions applied for all units at the facility. The hours of operation limitation is currently used to determine potential emission from each unit.

Monitoring

No monitoring is applicable to this section.

Recordkeeping

The facility is to track all hours of operation for emission units outlined in the equipment list. The recordkeeping condition is intended to apply only to those units which emit criteria pollutants and not for those units whose primary purpose is to collect or control pollutants. Records will also need to be maintained for the pulp production.

Conditions 3, 4, and 5 were developed to require the facility to develop and maintain startup, shutdown, and malfunction plans and control monitoring system programs for the units listed in condition 3.

Testing

The condition in this section is to allow testing to be conducted at the facility when requested.

Streamlined Requirements

The conditions from the underlying permits were included into the Title V permit as written. Conditions which required training and proper operation limitations for good air pollution control were handled either in the specific conditions in the Power House Process Area or within the General Condition section of the

permit. In most cases additional information from the applicable Federal regulations were added to the Title V for additional clarity rather than any streamlining of requirements. All testing conditions that were in previous permits (and were completed) were not included into the Title V.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.1-20.01:2 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement NO. 3-2001”.

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

- 9 VAC 5-80-80. Application
- 9 VAC 5-80-140. Permit Shield
- 9 VAC 5-80-150. Action on Permit Applications

F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

In order for emission units to be relieved from the requirement to make a written report in 14 days the emission units must have continuous monitors meeting the requirements of 9 VAC 5-50-410 or 9 VAC 5-40-41.

This general condition cites the sections that follow:

- 9 VAC 5-40-41. Emissions Monitoring Procedures for Existing Sources
- 9 VAC 5-40-50. Notification, Records and Reporting
- 9 VAC 5-50-50. Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:

40 CFR 60.13 (h). Monitoring Requirements.

J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources

9 VAC 5-80-190. Changes to Permits.

9 VAC 5-80-260. Enforcement.

9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources

9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas

9 VAC 5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The Landfill Gas NSR permit issued on 10/6/05 has specific requirements only enforceable by the State and has been identified as applicable if the facility constructs and operates landfill gas at the facility.

FUTURE APPLICABLE REQUIREMENTS

The facility is a major source of HAP's. MACT, 40 CFR 63 Subpart DDDDD will be applicable to the No. 8 and No. 10 Power Boiler on September 13, 2007. No other future applicable requirements have been identified for this source.

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart D	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This Subpart does not apply to the No. 6 Power Boiler and No. 8 Power Boiler since the construction of these units commenced before August 17, 1971. This Subpart does not apply to the No. 5 recovery furnace since it is exempt in 40 CFR 60.40b(j). This Subpart does not apply to the No. 4 recovery furnace since it has an annual fossil fuel capacity factor of less than 10%.
40 CFR 60, Subpart D NO _x Monitoring in §60.45(a)	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This monitoring requirement does not apply to the No. 10 Power Boiler since the mill was not required to install a NO _x CEMS pursuant to 40 CFR 60.45(b)(3).
40 CFR 60, Subpart D SO ₂ Monitoring in §60.45(a)	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	This monitoring requirement does not apply to the No. 10 Power Boiler since the mill was not required to install a SO ₂ CEMS pursuant to 40 CFR 60.45(b)(2).
40 CFR 60, Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978	This Subpart does not apply to the No. 6 Power Boiler, No. 8 Power Boiler, No. 10 Power Boiler, No. 4 recovery furnace, and No. 5 recovery furnace since these units do not meet the definition of an "electric utility steam generating unit."
40 CFR 60, Subpart Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	This Subpart does not apply to the No. 6 Power Boiler, No. 8 Power Boiler, No. 10 Power Boiler, and No. 4 recovery furnace since the construction of these units commenced before June 19, 1984. This Subpart does not apply to the No. 5 recovery furnace since it has an annual fossil fuel capacity factor of less than 10%.

40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	This Subpart does not apply to any of the listed storage tanks that store volatile organic liquids since all are below the exemption levels listed in the Subpart.
40 CFR 60, Subpart O	Standards of Performance for Sewage Treatment Plants	This Subpart does not apply to the No. 10 Power Boiler since the facility's wastewater treatment plant is not a municipal sewage treatment plant.
40 CFR 60, Subpart Y	Standards of Performance for Coal Preparation Plants	This Subpart does not apply to the facility since the facility does not meet the definition of a "coal preparation plant."
40 CFR 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	This Subpart does not apply to the No. 1 Lime Kiln, No. 4 recovery furnace, No. 4 smelt dissolving tanks, digester systems, pulp washing systems, and evaporator lines B, C, and D since the construction of these units commenced before September 24, 1976.
40 CFR 60, Subpart HH	Standards of Performance for Lime Manufacturing Plants	This Subpart does not apply to the No. 1 Lime Kiln and No. 2 Lime Kiln since they are exempt by 40 CFR 60.340(b).
40 CFR 63, Subpart Q	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers	This Subpart does not apply to the wastewater treatment plant since the facility does not use chromium based water treatment chemicals.
40 CFR 63, Subpart S Standards in §63.443(a)(1)(ii)(A-C)	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry	This standard does not apply to the pulp washing area deckers, knotters, and screen systems since they are below the specified HAP thresholds listed in this standard.
40 CFR 63, Subpart KK	National Emission Standards for the Printing and Publishing Industry	This Subpart does not apply to the facility since the facility does not conduct any printing operations.
40 CFR 63, Subpart JJJJ	National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating	This Subpart does not apply to the facility since the facility does not conduct any paper coating operations.

40 CFR 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Industrial Boilers and Process Heaters	This Subpart does not apply to the No. 4 recovery furnace and No. 5 recovery furnace since they are exempt by 40 CFR 63.7491(f).
40 CFR 72	Acid Rain Program	This program does not apply to the No. 6 Power Boiler, No. 8 Power Boiler, and No. 10 Power Boiler since they are exempt by 40 CFR 72.6(b)(4).

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 3 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

COMPLIANCE PLAN

The compliance plan stated in this permit is derived from the Consent Decree issued by EPA to Smurfit-Stone Container and signed on November 4, 2004. The conditions listed in the permit include dates and terms of this Decree.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
DS00	Black/White Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	1,320 gallons
DS00	White Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	2,256 gallons
DS02	Chip Hopper	Emissions 9 VAC 5-80-720 B	PM, VOC	Not Applicable
DS02	Pre-Steamer Vessel	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
DS02	Sand Separator	Emissions 9 VAC 5-80-720 B	VOC	900 gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
DS02	Dump Tank	Emissions 9 VAC 5-80-720 B	VOC	1,320 gallons
PW00	Reclaim Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	N. Cold Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	S. Cold Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	N. Hot Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	S. Hot Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PW00	Broke Thickener Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	24,000 gallons
PW00	White Pine Chest	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW01	Hardwood Primary Supply	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	30,550 gallons
PW03	Filtrate Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	238,313 gallons
PW03	Foam Breaker No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW03	Defoamer Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	9,930 gallons
PW04	#2 Line Pri Rej A/B Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Scrn Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Rej A Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	#3 Line Pri Rej B Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	Pri Screen Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	33.680 gallons
PW04	Secondary Knotter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PW04	Sand Separator Supply Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	4,700 gallons
PW04	Knots to Chip Bin	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
EV01	WBL Tank Vents (Hardwood)	Emissions 9 VAC 5-80-720 B	VOC	204,751 gallons
EV01	WBL Tank Vents (Softwood)	Emissions 9 VAC 5-80-720 B	VOC	1,142,139 gallons
EV01	A-D Line Evap Cond Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	E Line Evap Cond Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	A-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
EV01	A-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
EV01	A-Line Horizontal Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	7,074 gallons
EV01	B-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	B-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	C-Line Soap Skim Tank #1	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	21,813 gallons
EV01	C-Line Soap Skim Tank #2	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	23,135 gallons
EV01	Soap Skimming Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	62,108 gallons
EV01	Soap Holding Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	3,023 gallons
EV01	Common Soap Holder Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
EV01	Soap Skim Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	159,389 gallons
EV01	Soap Collection Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	4,847 gallons
EV01	Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	8,800 gallons
EV01	Heavy BL Tank Vent	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	75% BL Tank Vents (2)	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	Black Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	50% Black Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
EV01	Weak Liquor Boilout Tank	Emissions 9 VAC 5-80-720 B	VOC	310,817 gallons
EV03	Liquor Pond	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CR00	Smelt Cooling Tower, Smelt Spout Suction A	Emissions 9 VAC 5-80-720 B	VOC	800 gallons
CR00	Cooling Water Reclaim	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	800 gallons
CR07	RF5 #2 Fuel Day Tank	Emissions 9 VAC 5-80-720 B	VOC	50,000 gallons
CR07	RF4 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	35,547 gallons
CZ01	Green Liquor Clarifier	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	587,556 gallons
CZ04	Causticizer No. 11	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ04	Causticizer No. 12	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ04	Causticizer No. 13	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	42,304 gallons
CZ05	Dregs Precoat Filter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CZ05	Dregs Filter Vacuum Pump	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ05	Dregs Filter Receiver Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	187 gallons
CZ07	White Liquor Clarifier A	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier B	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier C	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ07	White Liquor Clarifier	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ08	Port Richmond Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	2,350,225 gallons
CZ08	Weak Wash Tank Small	Emissions 9 VAC 5-80-720 B	VOC	5,876 gallons
CZ08	Weak Wash Tank Large	Emissions 9 VAC 5-80-720 B	VOC	99,150 gallons
CZ08	White Liquor Day Tank	Emissions 9 VAC 5-80-720 B	VOC	168,922 gallons
CZ08	West Mudwasher Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
CZ08	South Mudwasher Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Mudwasher	Emissions 9 VAC 5-80-720 B	VOC	925,401 gallons
CZ08	Mud Storage Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	255,102 gallons
CZ08	No. 1 Weak Wash Surge Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	No. 2 Weak Wash Surge Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	Weak Wash Fill Back Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	No. 1 Mud Filtrate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ08	No. 2 Mud Filtrate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Scrubber Sump Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ08	Weak White Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
CZ08	Mud Mix Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	3,008 gallons
CZ08	Kiln Reused Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	VOC	1,760 gallons
CZ08	Mud Washer Feed Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	8,565 gallons
CZ08	Strong Waste Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	1,006,190 gallons

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CZ08	T.C. Cooling Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
CZ08	Sodium Hypochlorate	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
CZ09	Lime Mud Precoat Filters	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
CZ10	Lime Mud Precoat Vacuum Pumps	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
BP00	Emergency Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
BP00	Saltcake Filter	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Separator Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Saltcake Slurry Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Generator Dump Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Indirect Cooler H-12	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	CLO2 Absorption Tower	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Vacuum Seal Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Surface Condenser	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	S-10 Vent Scrubber	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Vent Scrubber Seal Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Sampling Chamber	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Sulfuric Acid Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP00	Strong Waste Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
BP03	50% Caustic Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	20,000 gallons
BP03	50% Caustic Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	26,520 gallons
BP03	Sodium Chlor. Mix Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	Not Applicable
BP03	7% Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	5,865 gallons
BP03	Sodium Chlor. Unloading	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	40,000 gallons
BP03	Sulfuric Acid Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	26,520 gallons
BP03	Sulfuric Acid Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PM04	PM Additives Handling	Emissions 9 VAC 5-80-720 B	VOC	Not Available

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PM07	Epsom Salt Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	2,500 gallons
PM07	White Water Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PM07	T.C. Water Tank	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PM07	T.C. Water Tank	Listed Exempt 9 VAC 5-80-720-A 64	Not Applicable	Not Applicable
PM07	Raw Aluminum Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	20,000 gallons
PM07	No. 1 Starch Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	455,000 lb.
PM07	No. 2 Starch Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	455,000 lb.
PM07	Sodium Hypochlorite	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
TT01	Brine Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	45,688 gallons
TT01	Wet Oil Tanks (3)	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Dry Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	45,680 gallons
TT01	Green Liquor Tank	Emissions 9 VAC 5-80-720 B	VOC	310,817 gallons
TT01	#1 Skimming Stlg Tank	Emissions 9 VAC 5-80-720 B	VOC	225,621 gallons
TT01	#2 Skimming Stlg Tank	Emissions 9 VAC 5-80-720 B	VOC	225,621 gallons
TT01	Sulfuric Acid Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	24,066 gallons
TT01	Tall Oil Soap Tank	Listed Exempt 9 VAC 5-80-720 A 43	Not Applicable	21,152 gallons
TT01	Liquid Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	2,256 gallons
TT01	Caustic Liquor Hook-up Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
TT01	Turpentine Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Turpentine Tank No. 2	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT01	Turpentine Condenser	Emissions 9 VAC 5-80-720 B	VOC	Not Available
TT03	Turpentine Catch-All	Emissions 9 VAC 5-80-720 B	VOC	212 gallons
PH00	Horizontal Mix Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Applicable
PH00	Reclaimed Caustic Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	12,000 gallons
PH00	T.C. Water Tank West	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH00	T.C. Water Tank East	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PH11	Demineralized Water	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH11	Demineralized Water	Listed Exempt 9 VAC 5-80-720 A 64	Not Applicable	Not Applicable
PH12	Caustic Tank No. 1	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	7,820 gallons
PH12	Caustic Tank No. 2	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	7,820 gallons
PH 13	Fuel Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PH13	Oil Storage Tank	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PH13	No. 2 Diesel Tank	Emissions 9 VAC 5-80-720 B	VOC	4,000 gallons
PH13	Diesel Fuel Tank	Emissions 9 VAC 5-80-720 B	VOC	4,000 gallons
PH13	No. 2 Diesel Tank	Emissions 9 VAC 5-80-720 B	VOC	10,575 gallons
PH13	PB8 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	17,774 gallons
PH13	Fuel Oil Tank	Emissions 9 VAC 5-80-720 B	VOC	1,729,766 gallons
PH13	PB9 #6 Fuel Oil Day Tank	Emissions 9 VAC 5-80-720 B	VOC	17,627 gallons
PH13	Horiz. Diesel Fuel No. 1	Emissions 9 VAC 5-80-720 B	VOC	16,529 gallons
PH13	Horiz. Diesel Fuel No. 2	Emissions 9 VAC 5-80-720 B	VOC	20,941 gallons
PH13	Horiz. Diesel Fuel No. 3	Emissions 9 VAC 5-80-720 B	VOC	17,627 gallons
PH13	Waste Oil Tank No. 1	Emissions 9 VAC 5-80-720 B	VOC	2,850 gallons
PH13	Waste Oil Tank No. 2	Emissions 9 VAC 5-80-720 B	VOC	2,850 gallons
PH13	Oil Water Sep. Tank	Emissions 9 VAC 5-80-720 B	VOC	660 gallons
PH13	Oil Accumulation Tank	Emissions 9 VAC 5-80-720 B	VOC	284 gallons
PH13	No. 12 Turbine Cooling Tower	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
WT01	Defoamer No. 1	Emissions 9 VAC 5-80-720 B	VOC	6,500 gallons
WT01	Defoamer No. 2	Emissions 9 VAC 5-80-720 B	VOC	7,048 gallons
WT01	Liquid Caustic Soda	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
WT01	Ferric Sulphate Tank	Non-Emitting Tank 9 VAC 5-80-720 A 42	Not Applicable	Not Available
PS01	HD Unbl Softwood Tanks	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	HD Unbl Hardwood Tanks	Emissions 9 VAC 5-80-720 B	VOC	Not Available

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
PS01	No. 1 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 2 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 3 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 4 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
PS01	No. 5 H.D. Storage	Emissions 9 VAC 5-80-720 B	VOC	Not Available
SF01	Secondary Fiber Plant	Emissions 9 VAC 5-80-720 B	VOC	Not Applicable
SF01	Secondary Fiber Dilution	Emissions 9 VAC 5-80-720 B	VOC	24,000 gallons
SF01	Fiber Leveling Chest	Emissions 9 VAC 5-80-720 B	VOC	Not Available

¹The citation criteria for insignificant activities are as follows:
 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9 VAC 5-80-720 B - Insignificant due to emission levels
 9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in the Richmond Times Dispatch on October 13, 2006 and public comment can be received from October 14, 2006 to November 12, 2006. Comments from the facility were received November 12, 2006. DEQ responded to these comments on December 28, 2006 (see comments and responses attached). No comments were received from EPA.