AIR POLLUTION CONTROL CONSTRUCTION PERMIT

EI FACILITY NO:	772009480	CONSTRUCTION PERMIT NO.: 16-POY-131
TYPE: Construction	on Permit for Proces	ses: B23
In compliance with t	he provisions of Cha	pter 285, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,
Name of Source:	Catalyst Paper - Bir	on Mill
Street Address:	621 North Biron Dr	ive
	Wisconsin Rapids,	Wood County, Wisconsin
Responsible Offici	al, & Title: Lucas	McLeod, Mill Manager
described in the plan conditions herein. The Construction Permit modify, replace and/	s and specifications one authority to construct expires eighteen (18 or reconstruct may be	ate Boiler B23 and to limit the facility-wide sulfur dioxide emissions dated August 8, 2016 through November 1, 2016 in conformity with the uct, modify, replace and/or reconstruct any process covered in this b) months from the date of issuance. This approved period to construct, the extended for up to 18 months upon request for cause, prior to expiration, action permit. [s. 285.60(1), Wis. Stats.; s. NR 406.12, Wis. Adm. Code]
	the construction per	ted in a construction permit are permanent and may only be revised mit condition, revision of a construction permit, or through the issuance of Wis. Stats.]
		asterisk (*) have been created outside of Wisconsin's federally approved not federally enforceable.
This authorization re and other terms and o		y the permit holder with the emission limitations, monitoring requirements n all Parts hereof.
Dated at Green Bay,	Wisconsin	December 8, 2016
STATE OF WISCO	NSIN	
DEPARTMENT OF		JRCES
For the Secretary		
By	/s/ Richard Wu	<u>lk</u>
Richard Wulk		

Environmental Engineer Supervisor

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Part I APPLICABLE LIMITATIONS AND SPECIFIC CONDITIONS

B. Boiler B23, Stack S11 — 324 MMBtu per hour Natural Gas Fired Industrial Boiler #4

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
1. Particulate Matter Emissions	(1) Particulate matter emissions may not exceed 0.10 pounds per million BTU. [s. NR 415.06(2)(c), Wis. Adm. Code, permit 16-POY-131] (2) Particulate matter emissions may not exceed 7.6 pounds per million cubic feet of natural gas burned as fuel. [ss. 285.65(3) and (7), Wis. Stats., permit 16-POY-131]	(1) Beginning on January 12, 2017 and thereafter, only natural gas may be burned as fuel in Boiler B23 (Boiler #4). [s. 285.65(7), Wis. Stats., permit 16-POY-131]	(1) Reference Test Method for Particulate Matter Emissions: Whenever compliance emission testing is required, USEPA Method 5 for non-condensible emissions and Method 202 for condensible backhalf emissions or another method approved by the department in writing shall be used to demonstrate compliance. [s. NR 439.06(1), Wis. Adm. Code] (2) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the design of the boiler, showing the fuel capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code, permit 16-POY-131]
2. Sulfur Dioxide	(1) Beginning on January 12, 2017 and thereafter, no fuel other than natural gas may be burned as fuel in Boiler B23 (Boiler #4). [s. 285.65(7), Wis. Stat., permit 16-POY-131]	(1) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the design of each boiler, showing the fuel capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code, permit 16-POY-131]	(1) Reference Test Method for Sulfur Dioxide Emissions: Whenever emission testing of sulfur dioxide emissions is required, USEPA Method 6, 6A, 6B, 6C or 8, or another method approved by the department in writing shall be used to demonstrate compliance. [s. NR 439.06(2)(a), Wis. Adm. Code]
3. Carbon Monoxide (CO)	(1) CO emissions may not exceed 20.0 pounds per hour. [s. 285.65(7), Wis. Stats., permit 16-POY-131]	(1) To demonstrate compliance with the CO emission limit in I.B.3.a.(1), the permittee shall conduct a compliance test within 90 days after the initial operation of burning natural gas at this boiler using USEPA Method 10, or another method approved by the Department in writing, while operating at 100% capacity. If operation at 100% capacity is not feasible, the source shall operate at a capacity level which is approved by the Department in writing. [s. 285.65(10), Wis. Stats., permit 16-POY-131]	(1) Reference Test Method for Carbon Monoxide Emissions: Whenever emission testing of carbon monoxide emissions is required, USEPA Method 10, 10A, or 10B, or another method approved by the department in writing shall be used to demonstrate compliance. [s. NR 439.06(4)(a), Wis. Adm. Code., permit 16-POY-131]

¹ The permittee has proposed this limit to avoid PSD applicability for the Boiler B23 modification project.

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the permittee shall also determine the nitrogen oxides emission rate in the unit of pounds per million BTU so as to verify the projected actual nitrogen oxides emission after boiler modification to become a natural gas fired boiler. The nitrogen oxides emission rate shall be determined using USEPA Method 7, 7A, 7B, 7C, 7D, 7E, or another method approved by the Department in writing, while operating at 100% capacity. [s. 285.65(10), Wis. Stats., permit 16-POY-131]	ollutant a	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
			oxides emission rate in the unit of pounds per million BTU so as to verify the projected actual nitrogen oxides emission after boiler modification to become a natural gas fired boiler. The nitrogen oxides emission rate shall be determined using USEPA Method 7, 7A, 7B, 7C, 7D, 7E, or another method approved by the Department in writing, while operating at 100% capacity. [s. 285.65(10), Wis. Stats., permit 16-POY-	
opacity. When combustion equipment is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80% opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day. thereafter, only natural gas may be burned as fuel in Boiler B23 (Boiler #4). [s. 285.65(7), Wis. Stats., permit 16-POY-131] Whenever visible emission testing is required USEPA Method 9 or another method approve the department in writing shall be used to demonstrate compliance. [s. NR 439.06(9)(a) Wis. Adm. Code] (2) The permittee shall keep and maintain on a technical drawings, blueprints or equivalent resolution of the design of the boiler, showing the fuel	be experience of the control of the	opacity. When combustion equipment is being cleaned or a new fire started, emissions may exceed number 1 of the Ringlemann chart or 20% opacity but may not exceed number 4 of the Ringlemann chart or 80% opacity for 6 minutes in any one hour. Combustion equipment may not be cleaned nor a fire started more than 3 times per day. (2) Visible emissions may exceed number 1 of the Ringlemann chart or 20% opacity for stated periods of time, as permitted by the department, for such purpose as an operating test, use of emergency equipment, or other good cause, provided no hazard or	thereafter, only natural gas may be burned as fuel in Boiler B23 (Boiler #4). [s. 285.65(7),	demonstrate compliance. [s. NR 439.06(9)(a)1., Wis. Adm. Code] (2) The permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the design of the boiler, showing the fuel capabilities. [s. NR 439.04(1)(d), Wis. Adm.
[ss. NR 431.05(1) and (2), Wis. Adm. Code]	C	Code]		
				(1) The permittee shall keep and maintain records
				of the date and other details of each of the annual
				tune-up of the boiler conducted. [s. 285.65(3), Wis.
Pollutants through (vi) while burning natural gas as (Maximum through (vi) while burning natural gas as necessary (the permittee may perform the stats., s. NR 439.04(1)(d), Wis. Adm. Code, processory (the permittee may perform the stats.)				Stats., s. NR 439.04(1)(d), Wis. Adm. Code, permit

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
Achievable Control Technology (MACT)) for Industrial, Commercial and Institutional Boilers and Process Heaters: 40 CFR Part 63, Subpart DDDD (40 CFR §63.7480- 63.7575)	[s. 285.65(13), Wis. Stats., 40 CFR §63.7540(a)(10), permit 16-POY-131] (2) If the boiler has a continuous oxygen trim system installed and operated that maintains an optimum air to fuel ratio, the permittee shall conduct a tune-up of the boiler once every 5 years as specified in I.B.1.b.(1)(i) through (vi) to demonstrate continuous compliance. The permittee may delay the burner inspection specified in I.B.1.b.(1)(i) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months. The permittee shall set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. [s. 285.65(13), Wis. Stats., 40 CFR §63.7540(a)(12), permit 16-POY-131]	burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; (ii) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; (iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection; (iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO _X requirement to which the unit is subject; (v) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and (vi) Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (vi)(A) through (C)	(2) The permittee shall maintain copies of each notification and report submitted to comply with 40 CFR 63, subpart DDDDD, including all documentation supporting any Initial Notification or annual, 2-, or 5-year compliance report submitted, according to the requirements in 40 CFR §63.10(b)(2)(xiv). [40 CFR § 63.7555(a), s. 285.65(13), Wis. Stats., and s NR 439.04(1)(d), Wis. Adm. Code, permit 16-POY-131] (3) The permittee shall submit annual or 5-year compliance reports, as applicable. The first annual or 5-year compliance report must be postmarked or submitted no later than January 31. Each subsequent annual or 5-year compliance reports must cover the applicable 1-, or 5-year periods from January 1 to December 31. Each subsequent annual or 5-year compliance reports must be postmarked or submitted no later than January 31. Each compliance report shall contain the following information: (a) Company and Facility name and address. (b) Process unit information (A description of the affected boiler, including identification of the fuels burned, the design heat input capacity of the unit, and the unit's fuel subcategory). (c) Date of report and beginning and ending dates of the reporting period for the affected boiler. (d) Include the date of the most recent tune-up for the affected boiler subject to only the requirement to conduct an annual or 5-year tune-up according to 40 CFR §63.7540(a) (10), or (12) respectively. Include the date of the most recent burner inspection if it was not done annually or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. (e) A statement by the responsible official with the official's name, title, and signature, certifying

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		of this section, (A) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; (B) A description of any corrective actions taken as a part of the tune-up; and (C) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. [s. 285.65(13), Wis. Stats., 40 CFR §63.7540(a)(10)(i)-(iv), permit 16-POY-131]	the truth, accuracy, and completeness of the content of the report. The permittee shall submit all reports electronically to the EPA via the CEDRI (CEDRI can be accessed through the EPA's CDX). You must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in 40 CFR §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [40 CFR § 63.7550(b) and (h)(3), and Table 9 of subpart DDDDD, s. 285.65(13), Wis. Stats., and s. NR 439.04(1)(d), Wis. Adm. Code), permit 16-POY-131]
			(4) If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or physical change resulted in the applicability of a different subcategory, you must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:
			 (a) The name of the owner or operator of the affected source, as defined in §63.7490, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice. (b) The currently applicable subcategory under this subpart. (c) The date upon which the fuel switch or

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Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
			physical change occurred. [40 CFR § 63.7545(h), s. 285.65(13), Wis. Stats., and s. NR 439.04(1)(d), Wis. Adm. Code), permit 16-POY-131]

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Z. Facility-wide Sulfur Dioxide Emission Cap

	lity-wide Sulfur Dioxide Emission Cap			
Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements	
1. Sulfur Dioxide (SO ₂)	(1) Beginning on January 12, 2017 and thereafter, the total sulfur dioxide emissions from the entire facility may not exceed 151.53 tons per month, averaged over any 12 consecutive months. ² [s. 285.65(7), Wis. Stats., permit 16-POY-131]	(1) To demonstrate compliance with the sulfur dioxide facility-wide emission limit in I.Z.1.a.(1), the permittee shall ensure that all of the following conditions in (a) through (h) are met: (a) The permittee shall ensure that the sulfur dioxide emissions from Boiler B24 (Boiler #5) will not exceed 151.40 tons per month, averaged over any 12 consecutive month. (b). To comply with condition I.Z.1.b.(1)(a), the permittee shall calibrate, maintain, and operate a continuous emission monitoring system (CEMS) that is capable of measuring and recording the sulfur dioxide emissions from Boiler B24 in the unit of pounds per hour. (c) Based on the sulfur dioxide emission rates recorded in I.Z.1.b.(1)(b), the permittee shall calculate and record the sulfur dioxide emissions from B24 in each month, on or before the last day of the following month. (d) Based on the emission calculations conducted each month as required in I.Z.1.b.(1)(c), the permit shall calculate and record the sulfur dioxide emissions from B24 per month, averaged over any 12 consecutive months, on or before the last day of the following month. (e) Boilers B20, B21 and B22 may only burn natural gas as fuel, as required by permit 89-MWH-129A. (f) As required in permit 89-MWH-129A, the total amount of natural gas burned in B20, B21 and B22, combined, may not exceed 560	(1) Reference Test Method for Sulfur Dioxide Emissions: Whenever emission testing of sulfur dioxide emissions is required, USEPA Method 6, 6A, 6B, 6C or 8, or another method approved by the department in writing shall be used to demonstrate compliance. [s. NR 439.06(2)(a), Wis. Adm. Code] (2) The permittee shall keep and maintain records of the Boiler B24 CEMS sulfur dioxide emission data required in I.Z.1.b.(1)(b). [s. 285.65(3), Wis. Adm. Code, permit 16-POY-131] (3) The permittee shall keep and maintain records of the Boiler B24 sulfur dioxide emission calulations required in I.Z.1.b.(1)(c) and (d). [s. 285.65(3), Wis. Adm. Code, permit 16-POY-131] (4) To comply with I.Z.1.b.(1)(e) and (h), the permittee shall keep and maintain on site technical drawings, blueprints or equivalent records of the design of the natural gas combustion equipment, showing the fuel capabilities. [s. NR 439.04(1)(d), Wis. Adm. Code, permit 16-POY-131]	

² The DNR has included the following enforceable emission limit at the request of the permittee in lieu of characterizing air quality through modeling or monitoring. This limit satisfies the agency requirements under 40 CFR Part 51 Subpart BB – Data Requirements for Characterizing Air Quality for the Primary SO₂ NAAQS.

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Z. Facility-wide Sulfur Dioxide Emission Cap

Pollutant	a. Limitations	b. Compliance Demonstration	c. Reference Test Methods, Recordkeeping and Monitoring Requirements
		million cubic feet in any 12 consecutive months. This fuel burning limit will result in a combined sulfur dioxide potential to emit of 0.014 tons per month, averaged over any 12 consecutive months. (g) The permittee shall comply with limitations and conditions in I.B. of this construction permit 16-POY-131. The resulting sulfur dioxide potential to emit from B23 will be 0.07 tons per month. (h) The permittee shall only use natural gas as fuel in the coal storage heaters P13 (total capacity of 15 million BTU per hour), the blade coater dryer, P51 (64 million BTU per hour capacity) and the P60 paper machine dryer (64 million BTU per hour capacity). Compliance with this condition will limit sulfur dioxide	Monitoring Requirements
		potential to emit from P13, P51 and P60 to 0.04 tons per month, averaged over any 12 consecutive months. [ss. 285.65(3) and (7), Wis. Stats., permit 16-POY-131]	

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ZZ. General Conditions Applicable to the Construction Permit.	
1. Construction Permit Transitional Language a. Limitations/Condition	h Compliance Demonstration
(1) Modified Emission Unit (B23). The permittee shall operate under the conditions in this construction permit beginning on January 12, 2017 and thereafter.	b. Compliance Demonstration (1) Compliance Reports/Records. The permittee shall submit periodic monitoring reports and certification of compliance for the modified emission unit for the period when that unit becomes operational. Note that compliance monitoring and reporting requirements and limitations of any unmodified units remain in effect.
	(2) Submittal of Compliance Testing Information and other updates. The permittee shall submit to the department any updates of the permit application. Updates are required if any changes that occur which are not specified or described in the plans and specifications dated August 8, 2016 through November 1, 2016. The updates shall be made within 60 days of the date of the change. Other information to be submitted shall include the notification requirements and stack tests results and the update of the facility's Malfunction prevention and Abatement Plan. The continued operation of the modified and new emission units addressed in this construction permit are prohibited once the authorization to construct expires per Condition Z.4.a.(2), unless any required updates have been submitted and the permittee has satisfied the notification requirements of Condition Z.4.b.(1) ³ .
	[s. NR 439.04(1)(d), Wis. Adm. Code (Permit 16-POY-131)]
	(3) All submittals described in this permit shall be made in writing and include the name of the facility, the facility's address, the construction permit number and a description of the affected emission unit(s).
	[s. NR 439.04(1)(d), Wis. Adm. Code (Permit 16-POY-131)]

³ To maintain the operation permit shield.

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ZZ. General Conditions Applicable to the Construction Permit.			
2. Updated Malfunction Prevention and Abatement Plan			
a. Limitations b. Compliance Demonstration			
(1) Malfunction Prevention and Abatement Plan. The permittee shall update the	(1) Malfunction Prevention and Abatement Plan. A Malfunction, Prevention,		
Malfunction Prevention and Abatement Plan to prevent, detect and correct malfunctions	and Abatement Plan shall be developed in accordance with condition II.F.		
or equipment failures which may cause any applicable emission limitation to be violated or which may cause air pollution with the modified emission unit(s).	[s. NR 439.11(1), Wis. Adm. Code (Permit 16-POY-131)]		
[s. NR 439.11, Wis. Adm. Code (Permit 16-POY-131)]			

ZZ. General Conditions Applicable to the Construction Permit. 3. Initial Stack Testing Requirements **a.** Limitations **b.** Compliance Demonstration (1) **Emission Stack Testing.** Upon completion of any required compliance (1) Emission Stack Testing. The permittee shall conduct compliance emission stack tests emission test, the permittee shall submit two copies of the report on the tests as required in the permit. for evaluation within 60 days of the date the tests were completed. The (a) If compliance emission test(s) cannot be conducted within the time frames specified, the emission test report shall be submitted to the Department of Natural Resources permit holder may request and the Department may approve, in writing, an extension of Wausau Service Center, Air Program, 5301 Rib Mountain Drive, Wausau, WI time to conduct the test(s). 54401 or an alternative address provided by the Department. Alternatively, the Department accepts and encourages electronic submittals of test reports, (b) All testing shall be performed with the emissions unit operating at capacity or as close to capacity as practicable and in accordance with approved procedures. If operation at uploaded through the permittee's Web Access Management System (WAMS) capacity is not feasible, the source shall operate at a capacity level which is approved by ID. For more details refer to the "Stack Testing Electronic Submittal the Department in writing. Guidebook" on the DNR website. (c) The Department shall be notified at least 20 business days in advance of a compliance [s. NR 439.04(1)(d), Wis. Adm. Code (Permit 16-POY-131)] emission test, to provide the Department an opportunity to have a representative present to witness the testing procedures. The notification shall include submission of a test plan. Any alternative test methods require prior approval in writing. The notification and test plan shall be submitted to the Department of Natural Resources Wausau Service Center, Air Program, 5301 Rib Mountain Drive, Wausau, WI 54401 or an alternative address provided by the Department. Alternatively, the Department accepts and encourages electronic submittals of test plans, uploaded through the permitee's Web Access Management System (WAMS) ID. For more details refer to the "Stack Testing Electronic Submittal Guidebook" on the DNR website. [s. NR 439.07, Wis. Adm. Code (Permit 16-POY-131)]

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ZZ . General Conditions Applicable to the Construction Permit.				
4. Construction Permit Notification and Authorization				
a. Limitations	b. Compliance Demonstration			
(1) Notifications. The permittee shall inform the Department of the following dates:	(1) Notifications. The permittee shall submit to the Department of Natural			
(a) The date construction commences on any new or modified emission unit(s) addressed in Permit 16-POY-131.	Resources Wausau Service Center, Air Program, 5301 Rib Mountain Drive, Wausau, WI 54401 or an alternative address provided by the Department, in writing, within 15 days of the date the event, the following:			
(b) The date the modified emission unit (B23) becomes operational. For purposes of this permit, "operational" shall be defined as the first time of any	(a) The date construction commences on the new or modified emission unit(s) addressed in Permit 16-POY-131.			
process related air contaminant is emitted into the ambient air.	(b) The date the modified emission unit (B23) becomes operational.			
[s. NR 439.03(1), Wis. Adm. Code (Permit 16-POY-131)]	[s. NR 439.04(1)(d), Wis. Adm. Code (Permit 16-POY-131)]			
(2) Construction Authorization Expiration. The Authorization to Construct, under Construction Permit 16-POY-131 expires 18 months after the date of issuance. Construction or modification and an initial operation period for equipment shakedown, testing and Department evaluation of operation to assure conformity with the permit conditions is authorized for each emissions unit covered in this permit. Please note that the sources covered by this permit are required to meet all emission limits and conditions contained in the permit at all times, including during the initial operation period. If 18 months is an insufficient time period for construction or modification, equipment shakedown, testing and Department evaluation of operation, the permit holder may request and the Department may approve in writing an extension of this permit. The conditions of the construction permit are permanent, unless revised, superseded or revoked. [ss. 285.60(1)(a)2. and 285.66(1), Wis. Stats.; s. NR 406.12, Wis. Adm. Code (Permit 16-POY-131)]				