S.C. Department of Health and Environmental Control

Bureau of Air Quality
State Construction Permit

WestRock CP, LLC
7320 Paper Mill Road
Florence, South Carolina 29506
Florence County

Pursuant to the provisions of the *Pollution Control Act*, Sections 48-1-50(5) and 48-1-110(a), the 1976 *Code of Laws of South Carolina*, as amended, and *South Carolina Regulation 61-62*, *Air Pollution Control Regulations and Standards*, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on August 10, 2016, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

Permit Number: **1040-0003-CN**
Issue Date: **October 27, 2016**

Elizabeth J. Basil, Director
Engineering Services Division
Bureau of Air Quality

A. PROJECT DESCRIPTION

Permission is hereby granted to implement a 2,000 ton per year SO_2 facility-wide limit per 40 CFR 51, Subpart BB – Data Requirements for Characterizing Air Quality for the Primary SO_2 NAAQS (National Ambient Air Quality Standards), 40 CFR §51.1203(e)(1).

Permission is hereby granted to install and operate a methanol liquefaction system on the Stripper Off-Gas (SOG) system at the Pulp Mill. The methanol liquefaction system will be used to maintain compliance with the SO_2 limit.

The methanol liquefaction system consists of a methanol condenser and a methanol storage tank. The SOG from the Pulp Mill Steam Stripper System will be routed to the methanol condenser prior to combustion in the Thermal Oxidizer. The condensed methanol will be collected in a new 1,500-gallon methanol storage tank and injected into the black liquor burned in the No. 3 Recovery Furnace to recover the energy value. The remaining SOG from the methanol condenser and the gases from the methanol storage tank will be routed to the Non-Condensable Gas (NCG) system for combustion in the Thermal Oxidizer, with the No. 3 Power Boiler serving as the backup combustion device.

B.1 EQUIPMENT

Equipment ID	Equipment Description	Control Device ID	Emission Point ID
13100[1]	No. 3 Recovery Furnace	CD13100[2]	13100[3]
13510	Methanol liquefaction condenser	13500[2], CD13500[2], 15300[2]	13500[3] 15300[1]
13511	Methanol storage tank	13500[2], CD13500[2], 15300[2]	13500[3] 15300[1]

Notes: The facility has changed equipment and control device IDs in the Title V application:
1 – Equipment ID 13100 is also known as E101 in the current Title V permit.
2 – Control device ID CD13100 is also known as E101A, 13500 is also known as E200A, and 15300 is also known as S403 in the current Title V permit. Control device CD13500 is also known as E200B.
3 – Emission point ID 13100 is also known as RECBOIL, 13500 is also known as INCINER, and 15300 is also known as CMBBOIL3 in the current Title V permit.

B.2 CONTROL DEVICES

Control Device ID	Control Device Description	Pollutant(s) Controlled
CD13100	Electrostatic precipitator	PM, PM_{10}, $PM_{2.5}$
13500, 15300	Thermal oxidizer (13500 – primary), No. 3 Power Boiler (15300 – backup)	VOC, HAP
CD13500	Thermal Oxidizer Adsorption Tower	SO_2

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.1	**Equipment/Control Device ID:** All (S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.
C.2	**Equipment/Control Device ID:** 13100, 13510, 13511, 13500, 15300, CD13100, CD13500 The owner/operator shall inspect, calibrate, adjust, and maintain continuous monitoring systems, monitoring devices, and gauges in accordance with manufacturer's specifications or good engineering practices. The owner/operator shall maintain on file all measurements including continuous monitoring system or monitoring device performance measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection by Department personnel.
C.3	**Equipment/Control Device ID:** 13100, 13510, 13511, 13500, 15300, CD13100, CD13500 All gauges shall be readily accessible and easily read by operating personnel and Department personnel (i.e. on ground level or easily accessible roof level). Monitoring parameter readings (i.e., pressure drop readings, etc.) and inspection checks shall be maintained in logs (written or electronic), along with any corrective action taken when deviations occur. Each incidence of operation outside the operational ranges, including date and time, cause, and corrective action taken, shall be recorded and kept on site. Exceedance of operational range shall not be considered a violation of an emission limit of this permit, unless the exceedance is also accompanied by other information demonstrating that a violation of an emission limit has taken place. Reports of these incidences shall be submitted semiannually. If no incidences occurred during the reporting period then a letter shall indicate such. Any alternative method for monitoring control device performance must be preapproved by the Department and shall be incorporated into the permit as set forth in S.C. Regulation 61-62.70.7.
C.4	**Equipment/Control Device ID:** 13100, 13500 For any source test required under an applicable standard or permit condition, the owner, operator, or representative shall comply with S.C. Regulation 61-62.1, Section IV - Source Tests. Unless approved otherwise by the Department, the owner, operator, or representative shall ensure that source tests are conducted while the source is operating at the maximum expected production rate or other production rate or operating parameter which would result in the highest emissions for the pollutants being tested. Some sources may have to spike fuels or raw materials to avoid being subjected to a more restrictive

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

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	feed or process rate. Any source test performed at a production rate less than the rated capacity may result in permit limits on emission rates, including limits on production if necessary. The owner or operator shall comply with any limits that result from conducting a source test at less than rated capacity. A copy of the most recent Department issued source test summary letter, whether it imposes a limit or not, shall be maintained with the operating permit, for each source that is required to conduct a source test. Site-specific test plans and amendments, notifications, and source test reports shall be submitted to the Manager of the Source Evaluation Section, Bureau of Air Quality.
C.5	**Equipment/Control Device ID:** All The owner or operator shall continue to operate under all applicable requirements, including emission limits and standards, testing, monitoring, record keeping, and reporting of the existing Title V Operating Permit (TV-1040-0003) that are not changed or contravened by this construction permit.
C.6	**Equipment/Control Device ID:** Facility-wide (40 CFR 51) This facility is an applicable source under 51.1200(2) Data Requirements Rule for Characterizing Air Quality for the Primary SO_2 NAAQS (DRR). Per 51.1203(e)(1), facility-wide actual emissions will be limited to less than 2,000 tons per year. The owner/operator shall calculate SO_2 emissions on a twelve-month rolling total. The first compliance period shall start on January 1, 2017 and end on December 31, 2017. Compliance with this limit will be demonstrated through the testing, monitoring, recordkeeping and reporting of actual emissions as established in SC Regulation 61-62.5 Standard 7(aa)(12) - Plantwide Applicability Limit (PAL) through construction permit 1040-0003-CM. Per these requirements, the owner or operator shall submit semi-annual monitoring reports and prompt deviation reports to the Bureau. These reports shall be submitted to the Bureau of Air Quality, Manager of Technical Management and the reports shall meet the requirements below: **Semiannual report**: The semi-annual report shall be submitted to the Bureau within 30 days of the end of each reporting period and shall contain the following: • The identification of owner and operator and permit number; • Total annual emissions (tons per year) based on a 12-month rolling total for each month in the reporting period, all data relied upon, including, but not limited to, any quality assurance or quality control data, in calculating the monthly and annual SO_2 pollutant emissions; • A list of any emission units modified or added to the major stationary source during the preceding 6-month period; • The number, duration, and cause of any deviations or monitoring malfunctions and any corrective action taken; • A notification of a shutdown of any monitoring system, whether the shutdown was permanent or temporary, the reason for the shutdown, the anticipated date that the monitoring system will be fully

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

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	operational or replaced with another monitoring system, and whether the emissions unit monitored by the monitoring system continued to operate, and the calculation of the emissions of the pollutant or the number determined by method included in the permit; • A signed statement by the responsible official certifying the truth, accuracy and completeness of the information provided in the report. **Deviation report**: The owner or operator shall promptly submit reports of any deviations or exceedances of the PAL requirements, including periods where no monitoring is available. A report submitted pursuant to 40 CFR 70.6(a)(3)(iii)(B) shall satisfy this reporting requirement. The deviation reports shall be submitted within the time limits prescribed by the Title V permit. The reports shall contain the following information: • The identification of the owner and operator; • The permit number; • The PAL requirement that experienced the deviation or that was exceeded; • The emissions resulting from the deviation or the exceedance; • A signed statement by the responsible official certifying the truth, accuracy and completeness of the information provided in this report. **Re-validation results**: The owner or operator shall submit to the Bureau the results of any revalidation test or method within 3 months after completion of such test or method. Methods used for re-validations and/or validations as well as any results of re-validations and/or validations shall be submitted to the Bureau of Air Quality, Director of Engineering Services.
C.7	**Equipment/Control Device ID:** 13100/CD13100, 13500, 15300 These sources are subject to New Source Performance Standards (NSPS), 40 CFR 60 Subpart A, General Provisions and Subpart BB, Standards of Performance for Kraft Pulp Mills, and S.C. Regulation 61-62.60 Subparts A and Subpart BB, Standards of Performance for Kraft Pulp Mills, as applicable. These sources shall comply with all applicable requirements of Subparts A and BB.
C.8	**Equipment/Control Device ID:** 13510, 13511, 13500, 15300 (S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from these sources (including fugitive emissions) shall not exhibit an opacity greater than 20%, each.
C.9	**Equipment/Control Device ID:** 13100/CD13100 (S.C. Regulation 61-62.5, Standard No. 4, Section III) Emissions from this source (including fugitive emissions) shall not exhibit an opacity greater than 40%. (40 CFR §60.282 Standard for Particulate Matter) (a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere: (a)(1) From any recovery furnace any gases which:

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	(a)(1)(i) Contain particulate matter in excess of 0.10 g/dscm (0.044 gr/dscf) corrected to 8 percent oxygen. (a)(1)(ii) Exhibit 35 percent opacity or greater.
C.10	**Equipment/Control Device ID:** 13100/CD13100 (40 CFR §60.284 Monitoring of Emissions and Operations) (a) Any owner or operator subject to the provisions of this subpart shall calibrate, maintain, and operate the following continuous monitoring systems: (a)(1) A continuous monitoring system to monitor and record the opacity of the gases discharged into the atmosphere from any recovery furnace. The span of this system shall be set at 70 percent opacity.
C.11	**Equipment/Control Device ID:** 13100 (S.C. Regulation 61-62.5, Standard No. 4, Section XI.B) The maximum allowable emission of TRS as H_2S by dry volume, averaged over 12 hours, from new design recovery furnaces shall be limited to 5 ppm (corrected to 8% oxygen). (40 CFR §60.283 Standard for Total Reduced Sulfur (TRS)) (a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere (a)(2) From any straight kraft recovery furnace any gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 8 percent oxygen.
C.12	**Equipment/Control Device ID:** 13500, 15300 (S.C. Regulation 61-62.5, Standard No. 4, Section XI.B) The maximum allowable emission of TRS as H_2S by dry volume, averaged over 12 hours, from condensate stripper systems shall be limited to 5 ppm (corrected to 8% oxygen). (40 CFR §60.283 Standard for Total Reduced Sulfur (TRS)) (a) On and after the date on which the performance test required to be conducted by §60.8 is completed, no owner or operator subject to the provisions of this subpart shall cause to be discharged into the atmosphere: (a)(1) From any condensate stripper system any gases which contain TRS in excess of 5 ppm by volume on a dry basis, corrected to 10 percent oxygen, unless the following condition is met: (a)(1)(iii) The gases are combusted with other waste gases in an incinerator or other device, or combusted in a lime kiln or recovery furnace not subject to the provisions of this subpart, and are subjected to a minimum temperature of 650°C (1200°F) for at least 0.5 second.
C.13	**Equipment/Control Device ID:** 13100, 13500, 15300

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	(S.C. Regulation 61-62.5, Standard No. 4, Section XI.D) D. 1 The owner/operator shall: a. Calibrate, maintain, and operate continuous monitoring equipment to monitor and record the concentration of TRS emissions on a dry basis and the percent of oxygen by volume on a dry basis in the gases discharged into the atmosphere from any recovery furnace or condensate stripper system, except where these gases are subjected to a minimum temperature of 1200 degrees Fahrenheit (F) for at least 0.5 seconds in an incinerator or other device which does not generate TRS. The location of each monitoring system must be approved by the Department. b. Calibrate, maintain, and operate a monitoring device which measures the combustion temperature at the point of incineration of effluent gases which are emitted from any recovery furnace or condensate stripper system unless TRS monitors are required in paragraph D.1.a above. The monitoring device is to be certified by the manufacturer to be accurate within plus or minus one (1) percent of the temperature being measured. d. (i) Continuously monitored operating and/or stack parameters may be used as substitutes for TRS monitors provided that it is demonstrated to the satisfaction of the Department that a correlation exists between the monitored parameter and TRS concentration and the other requirements in paragraph D.1 above are fulfilled. (ii) Alternative equivalent methods of monitoring must be approved by the Department and EPA. (40 CFR §60.284 Monitoring of Emissions and Operations) (a)(2) Continuous monitoring systems to monitor and record the concentration of TRS emissions on a dry basis and the percent of oxygen by volume on a dry basis in the gases discharged into the atmosphere from any recovery furnace or condensate stripper system, except where the provisions of §60.283(a)(1)(iii) or (iv) apply. These systems shall be located downstream of the control device(s) and the spans of these continuous monitoring system(s) shall be set: (a)(2)(i) At a TRS concentration of 30 ppm for the TRS continuous monitoring system, except that for any cross recovery furnace the span shall be set at 50 ppm. (a)(2)(ii) At 25 percent oxygen for the continuous oxygen monitoring system. (b) Any owner or operator subject to the provisions of this subpart shall calibrate, maintain, and operate the following continuous monitoring devices: (b)(1) For any incinerator, a monitoring device which measures and records the combustion temperature at the point of incineration of effluent gases which are emitted from any condensate stripper system where the provisions of §60.283(a)(1)(iii) apply. The monitoring device is to be certified by the manufacturer to be accurate within ±1 percent of the temperature being measured.
C.14	**Equipment/Control Device ID:** 13100, 13500

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	(40 CFR 60.8, 40 CFR 60.46) Within 60 calendar days after achieving the maximum production rate at which this facility will be operated, but no later than 180 calendar days after its initial startup and at such other times as may be required by the Department under section 114 of the Clean Air Act, the owner/operator of this facility shall conduct performance tests. Performance tests shall be conducted on 13100 and 13500 to show compliance with the TRS standard within 180 days of the startup of operations for this construction. Compliance with the TRS standard shall be determined by conducting performance tests in accordance with the procedures and methods specified in Subparts A and BB. A source test for SO_2 emissions at the Thermal Oxidizer (13500) shall be conducted within 180 days after the startup of operations for this construction. The source test will be used to establish an emission factor for SO_2.
C.15	**Equipment/Control Device ID: 15300** (S.C. Regulation 61-62.5, Standard No. 1, Section III) The maximum allowable discharge of sulfur dioxide (SO_2) resulting from this source is 2.3 pounds per million BTU input.
C.16	**Equipment/Control Device ID:** 13100, 13511 The daily average condensed methanol addition rate to the No. 3 Recovery Furnace shall not exceed 4.1 gallons per minute. The owner/operator must record the daily average liquefied methanol addition rate to the No. 3 Recovery Furnace and report the daily averages to the Department semiannually.

D. NESHAP PERIODIC REPORTING SCHEDULE SUMMARY

NESHAP Part	NESHAP Subpart	Compliance Monitoring Report Submittal Frequency	Reporting Period	Report Due Date
63	S	Semi-Annual	January 1 – June 30 July 1 – December	July 30 January 30
63	MM	Quarterly	January-March April-June July-September October-December	30th day following the end of each reporting period

1. This table summarizes only the periodic compliance reporting schedule. Additional reports may be required. See specific NESHAP Subpart for additional reporting requirements and associated schedule.
2. This reporting schedule does not supersede any other reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, 40 CFR Part 63, and/or Title V. The MACT reporting schedule may be adjusted to coincide with the Title V reporting schedule with prior approval from the Department in accordance with §63.10.a.5. This request may be made 1 year after the compliance date for the associated MACT standard.

E. NESHAP - CONDITIONS

Condition Number	Condition
E.1	All NESHAP notifications and reports shall be sent to the Manager of the Air Toxics Section, South Carolina Department of Health and Environmental Control - Bureau of Air Quality.
E.2	All NESHAP notifications and the cover letter to periodic reports shall be sent to the United States Environmental Protection Agency (US EPA) at the following address or electronically as required by the specific subpart: **US EPA, Region 4** **Air, Pesticides and Toxics Management Division** **61 Forsyth Street SW** **Atlanta, GA 30303**
E.3	**Equipment/Control Device ID:** 13510, 13511, 13500, 15300 This facility has processes subject to the provisions of S.C. Regulation 61-62.63 and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry. Existing affected sources shall be in compliance with the requirements of these Subparts by the compliance date, unless otherwise noted. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
E.4	**Equipment/Control Device ID:** 13510, 13511, 13500, 15300, 13100 (40 CFR §63.443 Standards for The Pulping System at Kraft, Soda, And Semi-Chemical Processes) (a) The owner or operator of each pulping system using the kraft process subject to the requirements of this subpart shall control the total HAP emissions from the following equipment systems, as specified in paragraphs (c) and (d) of this section. (a)(1) At existing affected sources, the total HAP emissions from the following equipment systems shall be controlled: (a)(1)(i) Each LVHC system; (c) Equipment systems listed in paragraphs (a) and (b) of this section shall be enclosed and vented into a closed-vent system and routed to a control device that meets the requirements specified in paragraph (d) of this section. The enclosures and closed-vent system shall meet the requirements specified in §63.450. (d) The control device used to reduce total HAP emissions from each equipment system listed in paragraphs (a) and (b) of this section shall: (d)(1) Reduce total HAP emissions by 98 percent or more by weight; or (d)(2) Reduce the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less by volume, corrected to 10 percent oxygen on a dry basis; or

E. NESHAP - CONDITIONS

Condition Number	Condition
	(d)(3) Reduce total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871°C (1600°F) and a minimum residence time of 0.75 seconds; or (d)(4) Reduce total HAP emissions using one of the following: (d)(4)(i) A boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or (d)(4)(ii) A boiler or recovery furnace with a heat input capacity greater than or equal to 44 megawatts (150 million British thermal units per hour) by introducing the HAP emission stream with the combustion air. (e) Periods of excess emissions reported under §63.455 shall not be a violation of §63.443(c) and (d) provided that the time of excess emissions divided by the total process operating time in a semi- annual reporting period does not exceed the following levels: (e)(1) One percent for control devices used to reduce the total HAP emissions from the LVHC system; and (e)(2) Four percent for control devices used to reduce the total HAP emissions from the HVLC system; and (e)(3) Four percent for control devices used to reduce the total HAP emissions from both the LVHC and HVLC systems.
E.5	**Equipment/Control Device ID:** 13510, 13511, 13100 (40 CFR §63.446 Standards For Kraft Pulping Process Condensates) (f) Each HAP removed from a pulping process condensate stream during treatment and handling under paragraphs (d) or (e) of this section, except for those treated according to paragraph (e)(2) of this section, shall be controlled as specified in §63.443(c) and (d).
E.6	**Equipment/Control Device ID:** 13500 (40 CFR §63.453 Monitoring Requirements) (a) Each owner or operator subject to the standards specified in §§63.443(c) and (d), 63.444(b) and (c), 63.445(b) and (c), 63.446(c), (d), and (e), 63.447(b) or §63.450(d), shall calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS, as defined in §63.2 of this part) as specified in paragraphs (b) through (m) of this section, except as allowed in paragraph (m) of this section. The CMS shall include a continuous recorder. (b) A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of §63.443(d)(1) through (d)(3). Owners and operators complying with the HAP concentration requirements in §63.443(d)(2) may install a CMS to monitor the thermal oxidizer outlet total HAP or methanol concentration, as an alternative to monitoring thermal oxidizer operating temperature.

E. NESHAP - CONDITIONS

Condition Number	Condition
	(n) To establish or reestablish the value for each operating parameter required to be monitored under paragraphs (b) through (j), (l), and (m) of this section or to establish appropriate parameters for paragraphs (f), (i), (j)(2), and (m) of this section, each owner or operator shall use the following procedures: (n)(1) During the initial performance test required in §63.457(a) or any subsequent performance test, continuously record the operating parameter; (n)(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; (n)(3) The owner or operator shall provide for the Administrator's approval the rationale for selecting the monitoring parameters necessary to comply with paragraphs (f), (i), and (m) of this section; and (n)(4) 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. (o) Each owner or operator of a control device subject to the monitoring provisions of this section shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraphs (a) through (n) of this section and established under this subpart. Except as provided in paragraph (p) of this section, §63.443(e), or §63.446(g), 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 this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions. (q) 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.
E.7	**Equipment/Control Device ID:** 13500 (40 CFR §63.454 Recordkeeping Requirements) (d) The owner or operator shall record the CMS parameters specified in §63.453 and meet the requirements specified in paragraph (a) of this section 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.
E.8	**Equipment/Control Device ID:** 13510, 13511, 13500, 15300

E. NESHAP - CONDITIONS

Condition Number	Condition
	(40 CFR §63.455 Reporting Requirements) (d) The owner or operator shall meet the requirements specified in paragraph (a) of this section 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.
E.9	**Equipment/Control Device ID:** 13500 (40 CFR §63.457 Test Methods and Procedures) (a) *Performance tests.* Initial and repeat performance tests are required for the emissions sources specified in paragraphs (a)(1) and (2) of this section, except for emission sources controlled by a combustion device that is designed and operated as specified in §63.443(d)(3) or (4). (a)(1) Conduct an initial performance test for all emission sources subject to the limitations in §63.443, 63.444, 63.445, 63.446, and 63.447. For the purposes of this construction project, the facility shall conduct a performance test to demonstrate compliance with the requirements of Subpart S within 180 days of startup following construction. (a)(2) Conduct repeat performance tests at five-year intervals for all emission sources subject to the limitations in §63.443, 63.444, 63.445. The first of the 5-year repeat tests must be conducted within 60 months from the date of the previous performance test. (40 CFR §63.9 Notification Requirements) (h) *Notification of compliance status.* (1) The requirements of paragraphs (h)(2) through (h)(4) of this section apply when an affected source becomes subject to a relevant standard. (h)(2)(ii) The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard (unless a different reporting period is specified in the standard, in which case the letter must be sent before the close of business on the day the report of the relevant testing or monitoring results is required to be delivered or postmarked). For example, the notification shall be sent before close of business on the 60th (or other required) day following completion of the initial performance test and again before the close of business on the 60th (or other required) day following the completion of any subsequent required performance test.
E.10	**Equipment/Control Device ID:** 13100, CD13100 This facility has processes subject to the provisions of S.C. Regulation 61-62.63 and 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants, Subparts A and MM – National Emission Standards For Hazardous Air Pollutants For Chemical Recovery Combustion Sources At Kraft, Soda, Sulfite, And Stand-Alone Semichemical Pulp Mills. Existing affected sources shall be in compliance with the requirements of these Subparts by the compliance date, unless otherwise noted. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
E.11	**Equipment/Control Device ID:** 13100, CD13100

E. NESHAP - CONDITIONS

Condition Number	Condition
	(40 CFR §63.862 Standards) (a) *Standards for HAP metals: existing sources.* (1) Each owner or operator of an existing kraft or soda pulp mill must comply with the requirements of either paragraph (a)(1)(i) or (ii) of this section. (a)(1)(i) Each owner or operator of a kraft or soda pulp mill must comply with the PM emissions limits in paragraphs (a)(1)(i)(A) through (C) of this section. (a)(1)(i)(A) The owner or operator of each existing kraft or soda recovery furnace must ensure that the concentration of PM in the exhaust gases discharged to the atmosphere is less than or equal to 0.10 gram per dry standard cubic meter (g/dscm) (0.044 grain per dry standard cubic foot (gr/dscf)) corrected to 8 percent oxygen.
E.12	**Equipment/Control Device ID: 13100, CD13100** (40 CFR §63.864 Monitoring Requirements) (d) *Continuous opacity monitoring system (COMS).* The owner or operator of each affected kraft or soda recovery furnace or lime kiln equipped with an ESP must calibrate, maintain, and operate a COMS according to the provisions in §§63.6(h) and 63.8 and paragraphs (d)(1) through (4) of this section. (k) *On-going compliance provisions.* (1) Following the compliance date, owners or operators of all affected sources or process units are required to implement corrective action if the monitoring exceedances in paragraphs (k)(1)(i) through (vi) of this section occur: (k)(1)(i) For a new or existing kraft or soda recovery furnace or lime kiln equipped with an ESP, when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity; (k)(2) Following the compliance date, owners or operators of all affected sources or process units are in violation of the standards of §63.862 if the monitoring exceedances in paragraphs (k)(2)(i) through (vii) of this section occur: (k)(2)(i) For an existing kraft or soda recovery furnace equipped with an ESP, when opacity is greater than 35 percent for 6 percent or more of the operating time within any quarterly period.

F. RESERVED

G. PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source.)	Report Due Date
Quarterly	January-March April-June July-September October-December	April 30 July 30 October 30 January 30
Semiannual	January-June April-September July-December October-March	July 30 October 30 January 30 April 30
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30
Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.		

H. REPORTING CONDITIONS

Condition Number	Condition
H.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
H.2	All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address: **2600 Bull Street** **Columbia, SC 29201** The contact information for the local EQC Regional office can be found at: **http://www.scdhec.gov**
H.3	The owner/operator shall submit written notification to the Director of Engineering Services of the date construction is commenced, postmarked within 30 days after such date.
H.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
H.5	(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emissions monitors, any malfunction of air pollution control equipment or system, process upset or other equipment failure which results in discharges of air contaminants lasting for one hour or more and which are greater than those discharges described for normal operation in the permit application shall be reported to the Department's local Environmental Quality Control Regional office within 24 hours after the beginning of the occurrence. The owner/operator shall also submit a written report within 30 days of the occurrence. This report shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality and shall include, at a minimum, the following:

H. REPORTING CONDITIONS

Condition Number	Condition
	1. The identity of the stack and/or emission point where the excess emissions occurred; 2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions; 3. The time and duration of excess emissions; 4. The identity of the equipment causing the excess emissions; 5. The nature and cause of such excess emissions; 6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction; 7. The steps taken to limit the excess emissions; and, 8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions.

I. PERMIT EXPIRATION AND EXTENSION

Condition Number	Condition
I.1	(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction: a. is not commenced within 18 months after receipt of such approval; b. is discontinued for a period of 18 months or more; or c. is not completed within a reasonable time as deemed by the Department. The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
I.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

J. PERMIT TO OPERATE

Condition Number	Condition
J.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
J.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.

J. PERMIT TO OPERATE

Condition Number	Condition
J.3	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation. Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.
J.4	(S.C. Regulations 61-62.1 Section II.F.3 and 61-62.70.7) The owner or operator shall submit a written request to the Director of the Engineering Services for a new or revised operating permit to cover any new or altered source postmarked within 15 days after the actual date of initial startup unless a more stringent time frame is required by regulation. The request should be made using the appropriate Title V modification form.

K. GENERAL CONDITIONS

Condition Number	Condition
K.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
K.2	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator shall demonstrate the affirmative defense of an emergency through properly signed, contemporaneous operating logs, and other relevant evidence that verify: 1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency; 2. The permitted source was at the time the emergency occurred being properly operated; 3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and 4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. In any enforcement action, the owner or operator seeking to establish the occurrence of an emergency has the burden of proof. This provision is in addition to any emergency, or upset provision contained in any applicable requirement.

K. GENERAL CONDITIONS

Condition Number	Condition
K.3	(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following: 1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. 3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. 4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

L. RESERVED