



**North Pacific Paper Company LLC
Longview**

**Air Operating Permit
SW18-22-R0-A**

Issued: July 15, 2021

Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058

AIR OPERATING PERMIT #: SW18-22-R0-A

ISSUED TO:
North Pacific Paper Company LLC
PO Box 2069
Longview, WA 98632

PLANT SITE:
North Pacific Paper Company - Longview
3001 Industrial Way
Longview, WA 98632

NATURE OF BUSINESS: Pulp and Newsprint Manufacturing

SIC / NAICS CODE: 2621 / 322122

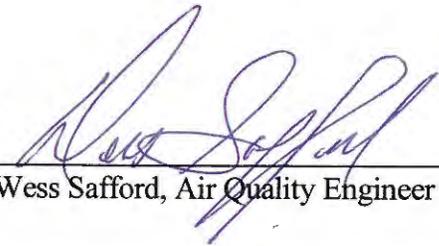
AIRS NUMBER: TBD

EFFECTIVE DATE: July 15, 2021

EXPIRATION DATE: June 18, 2024

RENEWAL APPLICATION DUE: June 18, 2023

PERMIT ENGINEER:


Wess Safford, Air Quality Engineer

7/15/21
Date

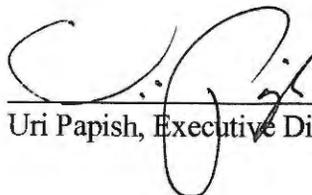
REVIEWED BY:


Paul T. Mairose, Chief Engineer

7/15/2021
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APPROVED BY:


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7/15/21
Date

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I. ABBREVIATIONS

List of Common Abbreviations

| | |
|-------------------|---|
| ADP | Air Discharge Permit |
| ADTP | Air Dried Tons, Pulp |
| AOP | Air Operating Permit |
| Btu | British thermal unit |
| CAM | Compliance assurance monitoring |
| CEM | Continuous emission monitor |
| CFR | Code of Federal Regulations |
| CO | Carbon monoxide |
| CO ₂ | Carbon dioxide |
| COMS | Continuous opacity monitoring system |
| Ecology | Washington Department of Ecology |
| EPA | U.S. Environmental Protection Agency |
| EU | Emission unit |
| FCAA | Federal Clean Air Act |
| G# | Refers to a specific general term or condition numbered "#" |
| gr/dscf | Grains per dry standard cubic foot |
| HAP | Hazardous air pollutant |
| IEU | Insignificant emission unit |
| K# | Refers to a specific recordkeeping term or condition numbered "#" |
| M# | Refers to a specific monitoring term or condition numbered "#" |
| MMBtu | Million British thermal units |
| MSDS | Material safety data sheet |
| N# | Refers to a specific nonapplicable requirement numbered "#" |
| NO _x | Oxides of nitrogen |
| NSR | New Source Review |
| O ₂ | Oxygen |
| P# | Refers to a specific permit provision numbered "#" |
| PM | Particulate matter |
| PM ₁₀ | Particulate matter less than 10 microns in diameter |
| PM _{2.5} | Particulate matter less than 2.5 microns in diameter |
| ppmvd | Parts per million by volume, dry |
| PSD | Prevention of Significant Deterioration |
| PTE | Potential to emit |
| R# | Refers to a specific reporting term or condition numbered "#" |
| RCW | Revised Code of Washington |
| Req # | Refers to a specific applicable requirement numbered "#" |
| SO ₂ | Sulfur dioxide |
| SIP | State implementation plan |
| SWCAA | Southwest Clean Air Agency |
| TAP | Toxic air pollutant |
| tpy | Tons per year |
| VOC | Volatile organic compound |
| WAC | Washington Administrative Code |

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations.

II. REGULATORY BASIS

This Air Operating Permit (AOP), hereafter referred to as the "Permit", is authorized under the procedures established in WAC 173-401 and Title V of the Federal Clean Air Act (FCAA). The terms and conditions of this permit describe the emissions limitations, operating requirements, ambient monitoring, recordkeeping requirements, and reporting frequencies for the permitted source. Permit terms and conditions are divided into the following categories: General Terms and Conditions, Operating Terms and Conditions, Monitoring Terms and Conditions, Recordkeeping Terms and Conditions, and Reporting Terms and Conditions. As used in this Permit, "term", "condition", "standard", and "requirement" have the same meaning as "applicable requirement" specified under 40 Code of Federal Regulations (CFR) 70.2 and WAC 173-401-200.

The Permit is intended to contain a comprehensive list of the local, state, and federal air pollution regulations and standards applicable to the Permittee's facility and to assure and provide for certification of compliance with those requirements. Sections V through IX describe the applicable requirements and cite the originating local, state, or federal regulation or requirement. Federal requirements may be direct (e.g., FCAA or CFR citation) or established under the Washington State Implementation Plan (SIP). Each citation in the table also includes one or two effective dates of the cited regulation. Where there are two dates for the same regulatory citation, the underlying requirement is substantially the same, but the date of the regulation used for enforcement purposes would be different (e.g., federally enforceable versus SWCAA enforceable).

SWCAA is the primary authority for enforcement of all requirements listed in the Permit (federal, state, and local) upon issuance of a final AOP. EPA and private citizens may also take enforcement actions under the Permit for those requirements that are federally enforceable; federal regulations, regulations that have a SIP date, and terms of Air discharge Permits (ADPs) are federally enforceable. Rules, regulations, and permits that are not SIP approved or federally promulgated are not federally enforceable.

The following table lists the title and effective dates of regulations applicable to the facility:

| <u>Regulation/Permit</u> | <u>SIP/Federal Effective Date</u> | <u>State/Local Effective Date</u> | <u>Notes / Exceptions</u> |
|-----------------------------------|---------------------------------------|---------------------------------------|---------------------------|
| <i>Federal Regulations</i> | | | |
| 40 CFR 51 | 7/1/2017 | -- | Not Delegated |
| 40 CFR 52 | 7/1/2017 | -- | Not Delegated |
| 40 CFR 68 | 7/1/2017 | -- | Not Delegated |
| <i>State Regulations</i> | | | |
| WAC 173-400-105(7) | 7/1/2016 | 7/1/2016 | |
| WAC 173-400-117 | 7/1/2016 | 7/1/2016 | |
| WAC 173-400-171 | 7/1/2016 | 7/1/2016 | |
| WAC 173-400-700 | 4/1/2011 | 7/1/2016 | |
| WAC 173-401 | -- | 3/5/2016 | |
| WAC 173-441 | -- | 3/1/2015 | |
| WAC 173-476 | 7/1/2016 | 7/1/2016 | |

| <u>Regulation/Permit</u> | <u>SIP/Federal Effective Date</u> | <u>State/Local Effective Date</u> | <u>Notes / Exceptions</u> |
|---------------------------------|-----------------------------------|-----------------------------------|---|
| <i>Local Regulations</i> | | | |
| WAC 173-460 | -- | 8/21/1998 | Local implementation of older version of state rule |
| SWCAA 400-030 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (21) and (129) |
| SWCAA 400-036 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (1)(c), (1)(d), (2), and (4) |
| SWCAA 400-040 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-050 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (3), (5) and (6) |
| SWCAA 400-060 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (2)(a), (3)(b), (5), (6), (7), (8)(c), (9), (10), (11), (12), (14) and (15)(c) |
| SWCAA 400-070 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-072 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (5)(a)(ii)(B), (5)(d)(ii)(B), (5)(d)(iii)(A), (5)(d)(iii)(B) |
| SWCAA 400-075 | -- | 6/18/2017 | |
| SWCAA 400-076 | -- | 6/18/2017 | |
| SWCAA 400-081 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-091 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-100 | -- | 6/18/2017 | |
| SWCAA 400-101 | -- | 6/18/2017 | |
| SWCAA 400-103 | -- | 6/18/2017 | |
| SWCAA 400-105 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-106 | 10/9/2016 | 6/18/2017 | SIP approval excludes remainder of rule sections |
| Sections (1)(a), (1)(b), (1)(c) | | | |
| SWCAA 400-107 | 9/21/1995 | 6/18/2017 | |
| SWCAA 400-109 | 10/9/2016 | 6/18/2017 | SIP approval excludes Sections (3)(d), (3)(e)(ii) and (4) |
| SWCAA 400-110 | 10/9/2016 | 6/18/2017 | SIP approval excludes Section (1)(d) |
| SWCAA 400-113 | 10/9/2016 | 6/18/2017 | SIP approval excludes Section (5) |
| SWCAA 400-114 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-115 | -- | 6/18/2017 | |
| SWCAA 400-116 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-120 | -- | 6/18/2017 | |
| SWCAA 400-130 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-131 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-136 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-151 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-161 | 10/9/2016 | 6/18/2017 | |

| <u>Regulation/Permit</u> | <u>SIP/Federal Effective Date</u> | <u>State/Local Effective Date</u> | <u>Notes / Exceptions</u> |
|--------------------------|-----------------------------------|-----------------------------------|---|
| SWCAA 400-171 | 10/9/2016 | 6/18/2017 | SIP approval excludes Section (2)(a)(xii) |
| SWCAA 400-200 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-205 | 10/9/2016 | 6/18/2017 | |
| SWCAA 400-270 | 10/9/2016 | 6/18/2017 | |
| SWCAA 425 | -- | 6/18/2017 | |
| SWCAA 476 | -- | 6/19/2017 | |
| SWCAA 400, Appendix A | 10/9/2016 | 6/18/2017 | |

Ecology Orders

| | | | |
|-------------------|------------|------------|--|
| Order 97AQ-I041 | 5/14/1997 | 5/14/1997 | |
| Order 98AQ-I046 | 8/21/1998 | 8/21/1998 | |
| Order 00AQIS-1196 | 6/1/2000 | 6/1/2000 | |
| Order 00AQIS-1704 | 10/20/2000 | 10/20/2000 | |
| Order 01-0612LET | 6/12/2001 | 6/12/2001 | |
| PSD 97-01-A4 | 4/21/2017 | 4/21/2017 | |

SWCAA Orders

| | | | |
|-------------|-----------|-----------|---|
| ADP 78-326 | 3/16/1978 | 3/16/1978 | CO and VOC requirements superseded by PSD 97-01 |
| ADP 79-475 | 8/23/1979 | 8/23/1979 | CO and VOC requirements superseded by PSD 97-01 |
| ADP 81-638 | 1/19/1982 | 1/19/1982 | CO and VOC requirements superseded by PSD 97-01 |
| ADP 86-837 | 9/23/1986 | 9/23/1986 | |
| ADP 21-3452 | 4/13/2021 | 4/13/2021 | |

III. EMISSIONS UNIT IDENTIFICATION

| ID | Generating Equipment/Activity | Emission Control |
|-----------|--------------------------------------|---|
| EU1 | Thermomechanical Pulp Mill | Process Enclosure |
| EU2 | Paper Machine #1 | Process Enclosure, Fabric Filtration, Low NO _x Burners (<i>air cap dryers</i>) |
| EU3 | Paper Machine #2 | Process Enclosure, Low NO _x Burners (<i>air cap dryers</i>) |
| EU4 | Paper Machine #3 | Process Enclosure, Low NO _x Burners (<i>air cap dryers</i>) |
| EU5 | De-inking Pulp Plant | Process Enclosure, Fabric Filtration |
| EU6 | Old Newsprint Baghouse | Building Enclosure, Fabric Filtration |
| EU7 | Recovered Fiber Pulp Mill | Low VOC Process Additives |

IV. PERMIT PROVISIONS

40 CFR 51.212
40 CFR 52.12, 52.33
40 CFR 60.11

P1. Credible Evidence

For the purposes of submitting compliance certifications or establishing whether a violation of any term or condition of this permit has occurred or is occurring, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with a specific term or condition if the appropriate performance or compliance test or procedure would have been performed.

P2. Insignificant Emission Unit - Restriction **WAC 173-401-530(6)**

Any emissions unit or activity that qualifies as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emissions thresholds specified in WAC 173-401-530(4) until this permit is modified pursuant to WAC 173-401-725.

P3. Permit Duration **WAC 173-401-610**

This permit shall be valid for a fixed term of five years from the date of issuance.

WAC 173-401-500(5)
WAC 173-401-620(2)(e)

P4. Confidentiality of Records and Information **SWCAA 400-270**

The permittee is responsible for clearly identifying information that is considered proprietary and confidential prior to submittal to SWCAA. Requests for proprietary and confidential information shall be released only after legal opinion by SWCAA's legal counsel, and notice to the permittee of the intent to release or deny the release of information.

In the case where the permittee has submitted information to SWCAA under a claim of confidentiality, SWCAA may also require the source to submit a copy of such information directly to the EPA Administrator.

Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.

WAC 173-401-620(2)
SWCAA 400-103

P5. Standard Provisions

- (a) *Duty to comply.* The permittee must comply with all conditions of this Chapter 401 permit. Any permit noncompliance constitutes a violation of Revised Code of Washington (RCW) Chapter 70.94 and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
- (b) *Need to halt or reduce activity not a defense.* It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) *Permit actions.* This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance,

- or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- (d) *Property rights.* This permit does not convey any property rights of any sort, or any exclusive privilege.
 - (e) *Duty to provide information.* The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permittee or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70.94.205.
 - (f) *Permit fees.* The permittee shall pay fees in accordance with RCW 70.94.162 as a condition of this permit in accordance with the permitting authority's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in RCW 70.94.430 and 70.94.431.
 - (g) *Emission trading.* No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
 - (h) *Severability.* If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.
 - (i) *Permit appeals.* This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board and serving it on the permitting authority within thirty days of receipt of the permit pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.
 - (j) *Permit continuation.* This permit and all terms and conditions contained herein shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

P6. Federally Enforceable Requirements

WAC 173-401-625

- (a) All terms and conditions in an air operating permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in paragraph (b) below.
- (b) Any terms and conditions included in this permit that are not required under the FCAA or under any of its applicable requirements are not federally enforceable under the FCAA. Terms and conditions so designated are not subject to the EPA and affected states review requirements of WAC 173-401-700 through WAC 173-401-820. Terms that are SWCAA enforceable only are marked as "local only".

P7. Permit Shield**WAC 173-401-640**

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements that are specifically identified in this permit as of the date of permit issuance. Nothing in this permit shall alter or affect the following:

- (a) The provisions of Section 303 of the FCAA (emergency orders), including the authority of the Administrator under that section;
- (b) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
- (c) The applicable requirements of the acid rain program, consistent with Section 408(a) of the FCAA;
- (d) The ability of EPA to obtain information from a source pursuant to Section 114 of the FCAA; and
- (e) The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as defined in RCW 70.94.

P8. Emergency Provision**WAC 173-401-645**

An "emergency" as defined in WAC 173-401-645(1) shall constitute an affirmative defense to an action brought for noncompliance with technology-based emission limitations. The burden of proof lies with the permittee. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (a) An emergency occurred, and the permittee can identify the causes(s) of the emergency;
- (b) The permitted facility was at the time being properly operated;
- (c) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (d) The permittee submitted notice of the emergency to the permitting authority within two working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an applicable requirement. This notice fulfills the requirement of WAC 173-401-615(3)(b) unless the excess emissions represent a potential threat to human health and safety. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

WAC 173-401-705(2)**P9. Permit Expiration – Application Shield****WAC 173-401-710(3)**

Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with WAC 173-401-710(1) and WAC 173-401-500. All terms and conditions of the permit shall remain in effect after the permit expires if a timely and complete permit application has been submitted. Operation under the terms and conditions of the expired permit will be allowed until SWCAA takes final action on the renewal application.

P10. Permit Revocation**WAC 173-401-710(4)**

The permitting authority may revoke a permit only upon the request of the permittee or for cause. The permitting authority shall provide at least thirty days written notice to the permittee prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the permittee an opportunity to meet with the permitting authority prior to the authority's final decision. A revocation issued under this section may be issued conditionally with a future effective date and may specify that the revocation will not take effect if the permittee satisfies the specified conditions before the effective date.

P11. Reopening for Cause**WAC 173-401-730**

This permit shall be reopened and revised under any of the following circumstances:

- (a) Additional applicable requirements become applicable to a major air operating permit source with a remaining permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j);
- (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;
- (c) The permitting authority or Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
- (d) The Administrator or the permitting authority determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopenings under this section shall not be initiated before a notice of such intent is provided to the AOP source by the permitting authority. Such notice shall be made at least 30 days in advance of the date that the permit is to be reopened, except that the permitting authority may provide a shorter time period in the case of an emergency.

WAC 173-401-722**P12. Changes Not Requiring Permit Revision / Off Permit Changes****WAC 173-401-724**

The Permittee may make changes as described in WAC 173-401-722 or WAC 173-401-724 without revising this permit, provided that the changes satisfy the criteria set forth in those sections, including the requirements to notify SWCAA and EPA. Changes made by the Permittee under WAC 173-401-724 do not qualify for a permit shield.

P13. Excess Emissions**SWCAA 400-107**

Excess emissions due to startup or shutdown conditions or due to scheduled maintenance shall be considered unavoidable provided the source reports as required under by SWCAA 400-107(1) and adequately demonstrates that the excess emissions could not have been prevented or avoided. This provision does not apply to federal standards.

Excess emissions due to upsets shall be considered unavoidable provided that the permittee reports as soon as possible but no later than 48 hours after discovery, and adequately demonstrates that:

- (a) The event was not caused by poor or inadequate design, operation, or maintenance, or any other reasonably preventable conditions;
- (b) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (c) The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded; and

- (d) The owner or operator(s) actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs, or other relevant evidence.

V. GENERAL TERMS AND CONDITIONS

G1. Certification of Submittals **WAC 173-401-520**

All application forms, reports, and compliance certifications must be certified by a responsible official. Certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information contained in the submittal are true, accurate, and complete.

G2. Duty to Supplement or Correct Application **WAC 173-401-500(6)**

The permittee, upon becoming aware that relevant facts were omitted, or incorrect information was submitted in a permit application, shall promptly submit such supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit.

G3. Inspection and Entry **WAC 173-401-630(2)** **SWCAA 400-105(2) & (3)**

The permittee shall allow inspection and entry, upon presentation of credentials and other documents as may be required by law, by the permitting authority or an authorized representative to perform the following:

- (a) Enter upon the permittee's premises where an air operating permit source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (c) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (d) As authorized by SWCAA 400-105 and the FCAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

G4. Schedule of Compliance **WAC 173-401-510(2)(h)(iii)** **WAC 173-401-630(3)**

The permittee shall continue to comply with all applicable requirements with which the source is currently in compliance and meet on a timely basis any applicable requirements that become effective during the permit term.

G5. Permit Renewal **WAC 173-401-710(1)**

The permittee shall submit a complete permit renewal application to SWCAA no later than the date established in the permit.

This permit expires on June 18, 2024. A renewal application is due on June 18, 2023. A complete renewal application is due no later than December 18, 2023.

G6. Transfer of Ownership or Operational Control WAC 173-401-720(1)(d)

A change in permittee due to transfer of ownership or operational control of an affected source requires a request for administrative permit amendment as governed by WAC 173-401-720(1)(d).

G7. Misrepresentation and Tampering SWCAA 400-105(5) & (6)

The permittee shall not make any false material statement, representation or certification in any form, notice, or report. The permittee shall not render inaccurate any monitoring device or method required under Chapter 70.94 RCW, or any ordinance, resolution, regulation, permit, or order in force pursuant thereto.

WAC 400-117, WAC 173-400-700

WAC 173-460 (Effective 8/21/1998 - Local Only)

G8. New Source Review SWCAA 400-109, SWCAA 400-800

The Permittee shall not construct or modify a source which is required to be reviewed under WAC 173-400-700, WAC 173-460 (effective 8/21/1998), SWCAA 400-109 or SWCAA 400-800 without first receiving an approval or permit under such provisions. Portable sources may be exempt from this requirement if they fulfill the criteria described in G9. This requirement is not applicable to emission units that comply with the provisions of SWCAA 400-072.

SWCAA 400-036

G9. Portable Sources SWCAA 400-110(6)

Portable sources which locate temporarily at the site of an air operating permit source shall be allowed to operate at the temporary location without filing an Air Discharge Permit application provided that:

- (a) The source/emissions units are registered with SWCAA;
- (b) The source/emission units have an air discharge permit to operate as a portable source or have an approved permit that meets the requirements of SWCAA 400-036;
- (c) The owner(s) or operator(s) notifies SWCAA of the intent to operate at the new location at least ten business days prior to starting the operation; and
- (d) The owner(s) or operator(s) supplies sufficient information including production quantities and hours of operation, to enable SWCAA to determine that the operation will comply with the emission standards for a new source and will not cause a violation of applicable ambient air quality standards and, if in a nonattainment area, will not interfere with scheduled attainment of ambient standards.

Replacement or Substantial Alteration of Emission Control**G10. Technology at an Existing Stationary Source SWCAA 400-114**

Prior to replacing or substantially altering emission control technology or equipment installed at an existing stationary source or emission unit, the permittee shall file an air discharge permit application with SWCAA. Construction shall not commence on a project subject to review until SWCAA issues a final air discharge permit or other regulatory order. However, any air discharge permit application filed under this section shall be deemed to be approved without conditions if the Agency takes no action within thirty (30) days of receipt of a complete application.

SWCAA 400-116(1)
Order 97AQ-I041 Condition 5
O/A 78-326 Condition 2

G11. Maintenance of Process Equipment **O/A 79-475 Condition 2, O/A 81-638 Condition 2**

Any process equipment, including features, machines, and devices constituting parts of or called for by plans, specifications, or other information submitted for approval or required as part of an approval shall be maintained and operate in good working order. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

SWCAA 400-116(2)
Order 97AQ-I041 Condition 5

G12. Maintenance of Control Equipment **ADP 78-326 Condition 2, ADP 79-475 Condition 2**

Any equipment that serves as air contaminant control or capture equipment shall be maintained and operated in good working order at all times in accordance with good operations and maintenance practices and in accordance with Agency approval conditions. The Agency reserves the right to take any and all appropriate action to maintain compliance with approval conditions, including directing the facility to cease operations of defective or malfunctioning equipment until corrective action can be completed.

G13. Outdoor Burning **SWCAA 425 (Local Only)**

The permittee is prohibited from conducting outdoor burning except as allowed by SWCAA 425.

40 CFR 61, Subpart M
SWCAA 400-075, SWCAA 476

G14. Asbestos

The permittee shall comply with the provisions of SWCAA 476 "Standards for Asbestos Control, Demolition and Renovation" when conducting any renovation, demolition, or asbestos storage activities at the facility.

G15. Protection of Stratospheric Ozone **40 CFR 82, Subparts B & F**

The permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR 82, Subparts B and F.

G16. Chemical Accident Prevention Program **40 CFR 68**

The permittee shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the following dates:

- (a) Three years after the date on which a regulated substance, present above the threshold quantity, is first listed under 40 CFR 68.130; or
- (b) The date on which a regulated substance is first present above a threshold quantity in a process.

VI. OPERATING TERMS AND CONDITIONS

The following table lists all federal, state, and/or locally enforceable requirements applicable to the permittee. The effective date for each applicable requirement is listed in Section II of this permit. The applicable legal authority is listed below each requirement. Applicable requirements identified as having "plantwide" applicability apply to both EUs and IEUs.

Some of the requirements have been partially adopted into the Washington State Implementation Plan (SIP). Only those parts adopted into the Washington SIP are federally enforceable. Requirements which are not required under the FCAA are denoted as state or local only. Monitoring requirements are intended to provide a reasonable assurance of compliance with the applicable requirements and may or may not involve the use of a reference test method.

| Req. # | Applicable Requirement | Emission Point | Monitoring |
|--------|---|----------------|------------|
| Req 1 | <p>Permittee shall not cause or permit the emission of an air contaminant that exceeds 20% opacity for more than 3 minutes (aggregate) in any 1-hour period, except as provided in SWCAA 400-040(1).</p> <p>Reference Method: SWCAA Method 9</p> <p>[SWCAA 400-040(1)]</p> | Facilitywide | M1 |
| Req 2 | <p>Permittee shall not cause or permit fallout of particulate matter beyond the source's property boundary in sufficient quantity to interfere unreasonably with use and enjoyment of the property on which the fallout occurs.</p> <p>[SWCAA 400-040(2) - <i>Local Only</i>]</p> | Facilitywide | M2 |
| Req 3 | <p>Permittee shall take reasonable precautions to prevent the release of air contaminants from any operation that emits fugitive emissions.</p> <p>[SWCAA 400-040(3)] [ADP 21-3452 Condition 3]</p> | Facilitywide | M2 |
| Req 4 | <p>Operations that cause or contribute to a nuisance odor shall use recognized good practice and procedures to reduce these odors to a reasonable minimum.</p> <p>[SWCAA 400-040(4) - <i>Local Only</i>] [ADP 21-3452 Condition 4]</p> | Facilitywide | M3 |
| Req 5 | <p>Permittee shall not cause or permit the emission of any air contaminant detrimental to persons, property, or business.</p> <p>[SWCAA 400-040(5)]</p> | Facilitywide | M3 |

| Req. # | Applicable Requirement | Emission Point | Monitoring |
|--------|--|----------------|------------|
| Req 6 | <p>Permittee shall not cause or permit any emissions unit to emit a gas containing in excess of 1,000 ppm of sulfur dioxide on a dry basis, corrected to 7% O₂ or 12% CO₂ as required by the applicable emission standard for combustion sources, and based on the average of 60 consecutive minutes.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 6</p> <p>[SWCAA 400-040(6)]</p> | Facilitywide | M10 |
| Req 7 | <p>Permittee shall not cause or permit the installation or use of any means which conceals or masks an emission which would otherwise violate any provisions of SWCAA 400-040.</p> <p>[SWCAA 400-040(7)]</p> | Facilitywide | M10 |
| Req 8 | <p>Permittee shall take reasonable precautions to prevent emissions of fugitive dust and operate the source to minimize emissions.</p> <p>[SWCAA 400-040(8)(a)]</p> | Facilitywide | M2 |
| Req 9 | <p>Permittee shall not cause or permit emissions of particulate matter from a combustion or incineration emission unit in excess of 0.1 gr/dscf of exhaust gas, corrected to an appropriate oxygen level.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 5</p> <p>[SWCAA 400-050(1)]</p> | Facilitywide | M2 |
| Req 10 | <p>Permittee shall not cause or allow emissions of particulate matter from a general process unit in excess of 0.1 gr/dscf of exhaust gas.</p> <p>Reference Method: 40 CFR 60, Appendix A, Method 5</p> <p>[SWCAA 400-060]</p> | Facilitywide | M2 |
| Req 11 | <p>The permittee shall not vary the rate of emission of a pollutant according to atmospheric conditions or ambient concentrations of that pollutant, except as directed according to air pollution episode regulations.</p> <p>[SWCAA 400-205]</p> | Facilitywide | M10 |

| Req. # | Applicable Requirement | Emission Point | Monitoring |
|--------|--|----------------|------------|
| Req 12 | <p>All wood chips used in the pulping process shall be used in an as received condition.</p> <p>[O/A 78-326, Whereas 3] [O/A 79-475, Whereas 3]</p> | EU1, EU2, EU3 | M10 |
| Req 13 | <p>VOC emissions from NORPAC I and II operations shall not exceed 2,007 lb/dy (as carbon) when averaged over any 30 consecutive day period.</p> <p>Reference Method: EPA Method 25A</p> <p>[PSD 97-01-A4 Condition 1]</p> | EU1, EU2, EU3 | M4 M5 |
| Req 14 | <p>VOC emissions from NORPAC I and II operations shall not exceed 311.0 tpy (as carbon) when averaged over any consecutive 12-month period.</p> <p>Reference Method: EPA Method 25A</p> <p>[PSD 97-01-A4 Condition 2]</p> | EU1, EU2, EU3 | M4 M5 |
| Req 15 | <p>CO emissions from NORPAC I and II operations shall not exceed 307.6 tpy when averaged over any consecutive 12-month period.</p> <p>Reference Method: EPA Method 10</p> <p>[PSD 97-01-A4 Condition 3]</p> | EU1, EU2, EU3 | M4 M5 |
| Req 16 | <p>Operation and maintenance (O&M) manual. The permittee shall maintain and follow an O&M manual for each emission unit in NORPAC I and II. The O&M manual shall identify operational parameters and practices that will constitute proper operation of each emission unit.</p> <p>The O&M manual shall be available for review by SWCAA and EPA. Emissions that result from a failure to follow the requirements of the O&M manual may be considered credible evidence that emission violations have occurred.</p> <p>[PSD 97-01-A4 Condition 11]</p> | EU1, EU2, EU3 | M10 |

| Req. # | Applicable Requirement | Emission Point | Monitoring | | | | | | | | | | | | | | | | |
|--------------------|---|------------------|-----------------------|-------------------|----------|--------------|-------------|----------|-------------|------------|------------|--------------|------------|--------------------|-------------|-----------------|------------|-----|----|
| Req 17 | Visible emissions from NORPAC III operations shall not exceed 0% opacity for more than 3 minutes (aggregate) in any 1-hour period. Reference Method: SWCAA Method 9 [Order 97AQ-I041 Condition 3] | EU4, EU5 | M1 | | | | | | | | | | | | | | | | |
| Req 18 | Equipment associated with NORPAC III operations shall to the extent practicable be maintained and operated at all times, including periods of abnormal operation and upset conditions, in a manner consistent with good air pollution control practice. [Order 97AQ-I041 Condition 5] | EU4, EU5 | M10 | | | | | | | | | | | | | | | | |
| Req 19 | Exhaust vents for the Size Press Starch Silo and Soap Silo shall be equipped and operated with fabric filters capable of reducing particulate matter emissions by 99% or greater. [Order 97AQ-I041 Condition 2 & Appendix A] | EU5 | M10 | | | | | | | | | | | | | | | | |
| Req 20 | PM/PM ₁₀ emissions from the Old Newsprint Baghouse shall not exceed 0.005 gr/dscf. Reference Method: EPA Method 5 or 17 [Order 98AQ-I046 Appendix A] | EU6 | M2 M7 | | | | | | | | | | | | | | | | |
| Req 21 | Combined emissions from operation of the Recovered Fiber Pulping Line must not exceed the following: <table border="0" style="margin-left: 40px;"> <thead> <tr> <th><u>Pollutant</u></th> <th><u>Emission Limit</u></th> </tr> </thead> <tbody> <tr> <td>VOC (as compound)</td> <td>4.54 tpy</td> </tr> <tr> <td>Acetaldehyde</td> <td>616.1 lb/yr</td> </tr> <tr> <td>Biphenyl</td> <td>200.2 lb/yr</td> </tr> <tr> <td>Chloroform</td> <td>26.5 lb/yr</td> </tr> <tr> <td>Formaldehyde</td> <td>73.3 lb/yr</td> </tr> <tr> <td>Methylene Chloride</td> <td>123.7 lb/yr</td> </tr> <tr> <td>Propionaldehyde</td> <td>75.9 lb/yr</td> </tr> </tbody> </table> [ADP 21-3452 Condition 1] | <u>Pollutant</u> | <u>Emission Limit</u> | VOC (as compound) | 4.54 tpy | Acetaldehyde | 616.1 lb/yr | Biphenyl | 200.2 lb/yr | Chloroform | 26.5 lb/yr | Formaldehyde | 73.3 lb/yr | Methylene Chloride | 123.7 lb/yr | Propionaldehyde | 75.9 lb/yr | EU7 | M8 |
| <u>Pollutant</u> | <u>Emission Limit</u> | | | | | | | | | | | | | | | | | | |
| VOC (as compound) | 4.54 tpy | | | | | | | | | | | | | | | | | | |
| Acetaldehyde | 616.1 lb/yr | | | | | | | | | | | | | | | | | | |
| Biphenyl | 200.2 lb/yr | | | | | | | | | | | | | | | | | | |
| Chloroform | 26.5 lb/yr | | | | | | | | | | | | | | | | | | |
| Formaldehyde | 73.3 lb/yr | | | | | | | | | | | | | | | | | | |
| Methylene Chloride | 123.7 lb/yr | | | | | | | | | | | | | | | | | | |
| Propionaldehyde | 75.9 lb/yr | | | | | | | | | | | | | | | | | | |
| Req 22 | Pulp production in the FibreFlow Drum Pulper must not exceed 60.6 ADTP per hour and 531,075 ADTP per year. [ADP 21-3452 Condition 7] | EU7 | M8 | | | | | | | | | | | | | | | | |

| Req. # | Applicable Requirement | Emission Point | Monitoring |
|--------|---|----------------|------------|
| Req 23 | Visible emissions from the Recovered Fiber Pulping Line must not exceed 0% opacity for more than 3 minutes in any 1-hour period. Reference Method: SWCAA Method 9 [ADP 21-3452 Condition 2] | EU7 | M1 |

VII. MONITORING TERMS AND CONDITIONS

To assure compliance with all applicable requirements, the permittee shall perform the monitoring program specified below. Specified monitoring is not required whenever an emission unit is not operated during a time period equal to or greater than the designated monitoring period. For these periods, the permittee shall record and report the reason why and the length of time the emission unit was not operated. Pursuant to WAC 173-401-530(2)(c), monitoring requirements are not applicable to IEUs unless specified below.

The permittee shall make a record of all required monitoring activities as described in Sections K1 and K2 of this permit.

General

M1. Visible Emissions Monitoring

WAC 173-401-615(1)

This monitoring requirement applies to Reqs 1, 17.

This monitoring requirement is applicable to both EUs and IEUs.

On a monthly basis, the permittee shall perform a brief qualitative observation of affected emission units during daylight hours for the purpose of identifying potential visible emissions violations. Based upon the qualitative observation, the permittee shall take one or more of the following actions:

- (a) If no visible emissions are observed, the permittee shall make a record of the observation, and no further action is necessary.
- (b) If visible emissions are observed, the permittee shall identify the source of the emissions, and confirm whether or not the pertinent equipment is experiencing a malfunction and that all relevant air pollution control equipment is operating properly. The permittee shall take corrective action to resolve the problem within 24 hours of initial discovery, and shall notify SWCAA regarding its progress in resolving the problem.
- (c) Subsequent to taking corrective action, the permittee shall perform a second qualitative observation of affected emission units. If no visible emissions are observed, then no further action is necessary. If visible emissions are still observed, the permittee shall demonstrate compliance with applicable visible emission limits by conducting a visible emissions evaluation in accordance with SWCAA Method 9 within 72 hours of initial discovery. For visible emissions in compliance with applicable visible emission limits, no further action is necessary.

If observed visible emissions are demonstrated to be out of compliance with applicable visible emissions limits, the permittee shall report an excess emission as described in Section R1 and

make a record of the event. Additional adjustments, repairs, and/or maintenance shall be performed as soon as practical to reduce the visible emissions to a level at or below the applicable opacity limit.

Implementation of corrective action does not shield the permittee from enforcement action by SWCAA or from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

General

M2. Fugitive Emissions/Particulate Matter Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Reqs 2-3, 8-10, 20.

This monitoring requirement is applicable to both EUs and IEUs.

On a monthly basis, or in response to a complaint, the permittee shall perform an inspection of affected emission units during daylight hours for the purpose of identifying fugitive emissions, odors, fallout and potential violations of applicable particulate matter emission limits. Based upon results of the inspection, the permittee shall take one or more of the following actions:

- (a) If no visible emissions, odor or fallout are observed, affected emission units are assumed to be in compliance with applicable emission limits. The permittee shall make a record of the observation and no further action is necessary.
- (b) If visible emissions, odor or fallout are observed during an inspection, the permittee shall verify the emission unit or process that is the source of emissions and any associated air pollution control equipment are operating properly. If the equipment is not operating properly, the permittee shall resolve the problem no later than 24 hours after initial discovery, or notify SWCAA by the next business day of the progress made in resolving the problem. Subsequent to resolving the problem, a second inspection shall be made. If visible emissions, odor or fallout are still observed, the permittee shall continue to make adjustments and/or repairs until such time as the affected emission unit is demonstrated to be in compliance. Reasonable precautions and good work practices shall be employed to minimize emissions for the duration of the event.

Implementation of corrective action does not relieve the permittee from the obligation of reporting permit deviations as specified in WAC 173-401-615(3).

General

M3. Complaint Monitoring WAC 173-401-615(1)

This monitoring requirement applies to Reqs 4-5.

This monitoring requirement is applicable to both EUs and IEUs.

The permittee shall record, and maintain record of, any air quality related complaints received by either the permittee or SWCAA. All complaints shall be investigated no later than 1 regular business day after the permittee has been notified. The permittee shall determine the validity of each complaint and the cause of any emissions that may have prompted the complaint, and initiate appropriate corrective action in response to the complaint. Within 24 hours of notification and investigation, permittee shall resolve the subject of the complaint, or notify SWCAA by the next working day of progress made in resolving the complaint.

NORPAC I and II**M4. Emission Testing****PSD 97-01-A4 Conditions 4-6**

This monitoring requirement applies to Reqs 13-15.

The permittee shall emission test NORPAC I and II operations for VOC and CO emissions in 2018. If the 2018 emission testing indicates a significant deviation in the emission factors (± 20 percent from the 2008–2009 emission factors), additional emission testing shall be conducted once every three years commencing in 2021. Otherwise, additional emission testing shall be conducted once every five years commencing in 2023.

Emission testing shall be performed by an independent testing firm. The emission points tested shall include, at a minimum, those tested in the 2015 emission evaluation program. All emission testing shall be conducted in accordance with the following requirements:

- (a) Each performance test shall consist of three separate runs using the applicable test method, with the overall test result to be an arithmetic average of the results of the three test runs, in accordance with 40 CFR 60.8(f).
- (b) A test plan shall be submitted for SWCAA's approval at least 30 days prior to the testing.
- (c) Emission testing shall include, but may not be limited to, the following:
 - (1) Sampling location and in-stack points as measured by EPA Method 1.
 - (2) Stack gas velocity and volumetric flow rate as measured by EPA Method 2.
 - (3) Carbon monoxide as measured by EPA Method 10.
 - (4) Volatile organic compounds as measured by EPA Methods 25, 25A, or 25B. The test protocol shall be modified as necessary to handle high moisture content. Any moisture removed as a result of such modification shall be analyzed for VOCs, which shall be accounted for in the final test results.

Any deviation from the above test methods must be agreed to by the permitting authority in the test plan. On a case-by-case basis, the permitting authority may approve the exclusion of certain emission points from a specific source testing program, based on safety, technical or other emission unit specific factors. The permittee shall demonstrate to the satisfaction of the permitting authority why some emission points should not be tested during any particular source testing program.

The objective of emission testing is to verify the reasonableness of emission factors developed in the 2008–2009 emission evaluation program. If a significant deviation in emission factors (± 20 percent) is found, SWCAA or North Pacific Paper Company, LLC may initiate a technical discussion on the need to amend the emission factors presented in PSD 97-01-A4, Tables 1 and 2 or Ecology may require amendment of the emission factors.

NORPAC I and II**M5. Emission Monitoring****PSD 97-01-A4 Conditions 1-3, 7**

This monitoring requirement applies to Reqs 13-15.

The Permittee shall record the following information for NORPAC I and II operations:

- (a) Quantity of high brightness and normal brightness pulp produced each month (BDMT);
- (b) Approximate percentage of each wood species type pulped each month;
- (c) Number of hours each month pulp was produced while the Reboiler was down;
- (d) Quantity of paper produced each month (ADMT);
- (e) Quantity of natural gas consumed in the paper machines each month (MMscf/MMBtu); and
- (f) Calculated air emissions each month.

Compliance with the daily VOC emission limit shall be assured by computing daily VOC emission rate from the NORPAC I and II units. Daily VOC emission rate shall be calculated by multiplying daily production rates by the appropriate emission factors from PSD 97-01-A4, Table 1 (*Appendix B of this permit*). Such calculations shall account for all operations at each operating condition during each day of operation.

Compliance with the annual VOC emission limit shall be assured by the summation of monthly-calculated emission rates over the calendar year. Monthly emissions shall be calculated by multiplying monthly TMP and Paper Machine production values under each operating condition by the appropriate emission factors from PSD 97-01-A4, Table 1 (*Appendix B of this permit*). Such calculations shall account for all operations at each operating condition during each calendar month.

Compliance with the annual CO emission limit shall be assured by the summation of monthly-calculated emission rates over the calendar year. Monthly emissions shall be calculated by multiplying monthly TMP and Paper Machine production values under each operating condition by the appropriate emission factors from PSD 97-01-A4, Table 2 (*Appendix B of this permit*). Such calculations shall account for all operations at each operating condition during each calendar month.

NORPAC III**M6. Emission Monitoring****Order 97AQ-I041 Condition 4**

This is a general monitoring requirement.

The permittee shall record the following information for NORPAC III operations:

- (a) Quantity of gross pulp produced each month (BDMT);
- (b) Quantity of paper produced each month (ADMT); and
- (c) Quantity of natural gas consumed in the air cap dryer system each month (MMscf/MMBtu).

Emissions from the De-inking Pulp Plant shall be calculated from recorded pulp production and applicable emission factors.

Emissions from Paper Machine #3 shall be calculated from recorded paper production and natural gas consumption and applicable emission factors.

Old Newsprint Baghouse

SWCAA 400-106(1)(d)

M7. Emission Testing and Monitoring**Order 98AQ-I046 Appendix A**

This monitoring requirement applies to Req 20.

The Old Newsprint Baghouse shall be emission tested for PM on a continuing 5-year cycle in accordance with the protocol found in Appendix A of this permit. A test plan shall be submitted for SWCAA's approval at least 10 business days prior to the testing.

The permittee shall record the following information for the Old Newsprint Baghouse:

- (a) The number of hours of baghouse operation each month;
- (b) The results of each emission test; and
- (c) Each incidence of baghouse maintenance and repair.

Emissions from the Old Newsprint Baghouse shall be calculated from recorded hours of operation, baghouse discharge rate, and the results of the most recent emission test.

Recovered Fiber Pulping Line

SWCAA 400-106(1)(d)

M8. Emission Monitoring**ADP 21-3452 Condition 11**

This monitoring requirement applies to Reqs 21, 22.

The permittee must monitor and record the following information for the Recovered Fiber Pulping Line:

- (a) Quantity of pulping line pulp production each month (ADTP);
- (b) Hours of pulping line operation each month; and
- (c) Each occurrence of maintenance and repair activities.

Emissions from the Recovered Fiber Pulping Line must be calculated from recorded pulp production and the following emission factors:

| <u>Pollutant</u> | <u>Emission Factor</u> |
|--------------------|------------------------|
| VOC | 0.0171 lb/ADTP |
| Acetaldehyde | 0.00116 lb/ADTP |
| Biphenyl | 0.00038 lb/ADTP |
| Carbon Disulfide | 0.00294 lb/ADTP |
| Chloroform | 0.00005 lb/ADTP |
| Formaldehyde | 0.00014 lb/ADTP |
| Methanol | 0.00253 lb/ADTP |
| Methylene Chloride | 0.00023 lb/ADTP |
| Phenol | 0.00031 lb/ADTP |
| Propionaldehyde | 0.00014 lb/ADTP |
| Toluene | 0.0016 lb/ADTP |

Greenhouse Gas**M9. Emission Monitoring****WAC 173-441-050**

This is a general monitoring requirement.

The permittee shall monitor greenhouse gas emissions by maintaining a record of applicable data elements specified in WAC 173-441-050(6)(a)-(h). Records shall be kept in a form suitable for expeditious inspection and review. Upon request, records required under this section must be made available to Ecology. Records may be retained offsite if the records are readily available for expeditious inspection and review. For records that are electronically generated or maintained, the equipment or software necessary to read the records shall be made available, or, if requested by Ecology, electronic records shall be converted to paper documents.

Affected monitoring systems must meet the applicable flow meter calibration and accuracy requirements of WAC 173-441-050(8). The accuracy specifications in that subsection do not apply where the use of company records (*defined in WAC 173-441-020(3)*) or the use of "best available information" is specified in an applicable subsection of WAC 173-441 to quantify fuel usage and/or other parameters.

Greenhouse gas emissions shall be calculated using the methodologies specified in relevant sections of WAC 173-441. The same calculation methodology shall be used throughout a reporting period unless a written explanation of why a change in methodology was required is provided.

M10. Compliance Certification**WAC 173-401-615(1)(b)**

This monitoring requirement applies to Reqs 6-7, 11-12, 16, 18-19

The permittee shall certify the following in each semi-annual report:

- (a) Process units the facility burned only natural gas during the reporting period;
- (b) Installed equipment did not conceal or mask any emissions which are otherwise in violation of general standards;
- (c) All wood chips used in the pulping process were used as received;
- (d) An O&M manual was maintained and followed for each emission unit in NORPAC I and II;
- (e) Equipment associated with NORPAC III was maintained and operating in a manner consistent with good air pollution control practice; and
- (f) All starch silo exhaust vents were equipped and operated with fabric filters.

VIII. RECORDKEEPING TERMS AND CONDITIONS

The permittee shall maintain files of all information, including all reports and notifications, recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Pursuant to WAC 173-401-530(2)(c), recordkeeping requirements are not applicable to IEUs unless specified below.

General Recordkeeping**WAC 173-401-615(2)**

Permittee is required to keep the following records as applicable:

- (a) Inspections and Certifications
 - (1) Date and time of the inspection or certification;
 - (2) Name and title of the person who conducted the inspection or certification;
 - (3) Identification of the unit or activity being inspected or certified;
 - (4) Operating conditions of the unit or the type of activity occurring at the time of the inspection or certification;
 - (5) Compliance status of each monitored requirement as described in Sections V and VII of this permit; and
 - (6) Description of corrective action (if any) taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (b) Complaints
 - (1) Date and time of complaint;
 - (2) Name of the complainant;
 - (3) The nature of the complaint;
 - (4) Date and time of follow-up inspection;
 - (5) The name and title of the person who conducted the follow-up inspection; and
 - (6) Description of corrective action (if any) taken in response to complaint.
- (c) Sampling and Emissions Testing
 - (1) Date sampling was performed;
 - (2) Entity that performed the sampling;
 - (3) Name and title of the person or the entity that performed the sampling or testing;
 - (4) Analytical techniques used to take the sample;
 - (5) Operating conditions existing at the time of sampling or measurement to include, as a minimum for emission point source testing:
 - (A) Heat input (million Btu/hr) or fuel consumption rate (EU-1);
 - (B) Air discharge flowrate (dry standard cubic feet);
 - (C) Exhaust temperature of emissions out the stack (EU-1);
 - (D) Unit load on an hourly basis (EU-1);
 - (6) Date analytical analyses (if any) were performed;
 - (7) Entity that performed the analyses;
 - (8) Analytical techniques or methods used;
 - (9) Results of such analyses;
 - (10) Compliance status of each monitored requirement as described in Section V and VII of this permit; and
 - (11) Description of corrective action taken in response to permit deviations and when action was initiated.
- (d) Periodic Monitoring and Emissions Records
 - (1) Date and time of parameter observation or emission calculation;
 - (2) Name of parameter observed or emission calculated;
 - (3) Observed parameter value or calculated emission value with appropriate units; and
 - (4) Periods that data was unavailable.

- (e) Excess Emissions and Upset Conditions
 - (1) Date and time of excess emission or upset condition occurred;
 - (2) Nature of the excess emission or upset condition and an identification of the affected unit, process, or activity; and
 - (3) Description of corrective action taken in response to a discovered permit deviation, excess emission, upset condition, or malfunction, as applicable.
- (f) Maintenance Activities
 - (1) Date and time of the maintenance activity;
 - (2) Name of the person/company who performed the maintenance;
 - (3) Identification of the unit or activity being maintained; and
 - (4) Description of the maintenance being conducted.

IX. REPORTING TERMS AND CONDITIONS

All required reports must be certified by a responsible official consistent with WAC 173-401-520. Where an applicable requirement requires reporting more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification. Where a reporting schedule is specified (e.g. quarterly, semi-annual, or annual), compliance with the reporting frequency is met when reports are submitted more frequently than required. Pursuant to WAC 173-401-530(2)(c), reporting requirements are not applicable to IEUs unless specified below.

Reports shall be submitted to the following addresses, unless otherwise instructed:

Control Officer
Southwest Clean Air Agency
11815 NE 99 Street, Suite 1294
Vancouver, WA 98682

Clean Air Act Compliance Manager
U.S. EPA Region 10, Mail Stop: OCE-101
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

WAC 173-401-615(3)(b)
SWCAA 400-107

R1. Deviations from Permit Conditions

PSD 97-01-A4 Condition 8

The permittee shall report deviations from permit conditions to SWCAA no later than 30 days after the end of the month during which the deviation is discovered. Deviations that represent a potential threat to human health or safety shall be reported as soon as possible but no later than twelve hours after the deviation is discovered.

Excess emissions shall be reported as soon as possible. In accordance with SWCAA 400-107(1), excess emissions that the permittee wishes to be considered unavoidable must be reported no later than 48 hours after discovery.

All deviation reports shall be submitted in writing (e.g. e-mail, facsimile or letter). Each report shall include the following information:

- (a) Identification of the emission unit(s) involved;
- (b) Duration of the event including the beginning and end times;

- (c) Description of the event, including:
 - (1) Whether or not the deviation was due to an upset condition, and
 - (2) Probable cause of the deviations;
- (d) Estimate of the quantity of excess emissions for exceedances of non-opacity emission limits;
- (e) Description of corrective action taken in response to the event (if any); and
- (f) Preventive measures taken or planned to minimize future recurrence.

WAC 173-401-615(3)

R2. Complaint Reports

ADP 21-3452 Condition 12

The permittee shall report all air pollution related complaints to SWCAA within 3 business days of receipt. Complaint reports shall include the following information:

- (a) Date and time of the complaint;
- (b) Name of the complainant;
- (c) Nature of the complaint; and
- (d) Description of action taken in response to complaint (if any).

R3. Monthly Reports

PSD 97-01-A4 Condition 7.4

The permittee shall submit a monthly emissions report to SWCAA no later than 30 days after the end of each calendar month. Each monthly report must be certified by a responsible official consistent with WAC 173-401-520, and shall contain, at a minimum, the following information:

- (a) Total CO and VOC emissions from NORPAC I and II operations for the month; and
- (b) Cumulative CO and VOC emissions from NORPAC I and II operations for the preceding 12-month period.

WAC 173-401-615(3)

R4. Semi-Annual Reports

ADP 21-3452 Condition 17

The permittee shall submit a semi-annual report to SWCAA by September 15th and March 15th for the six-month periods January through June and July through December respectively. Each semi-annual report must be certified by a responsible official consistent with WAC 173-401-520, and shall contain, at a minimum, the following information:

- (a) A summary of all deviations from permit requirements that occurred during the reporting period. If no deviations occurred, then a statement to that effect shall be submitted;
- (b) Compliance certification in accordance with monitoring requirement M9 of this permit;
- (c) Records of all required monitoring and inspections as described in monitoring requirements M1 thru M3 of this permit;
- (d) Results of all EPA Method 9 or SWCAA Method 9 monitoring conducted during the reporting period. A copy of the relevant opacity certification(s) shall be submitted with the report;
- (e) Quantity of high brightness and normal brightness pulp produced for each month (BDMT);
- (f) Number of hours each month pulp was produced while the Reboiler was down;
- (g) Quantity of paper produced by NORPAC I and II for each month (ADMT);
- (h) Quantity of natural gas consumed in Paper Machines #1 and #2 for each month (MMscf/MMBtu);
- (i) Quantity of de-ink pulp produced for each month (BDMT);
- (j) Quantity of paper produced by NORPAC III for each month (ADMT);
- (k) Quantity of natural gas consumed in Paper Machine #3 for each month (MMscf/MMBtu);
- (l) Number of hours of Old Newsprint Baghouse operation for each month;
- (m) Quantity of pulp produced by the Recovered Fiber Pulping Line for each month (ADTP);
- (n) Number of hours of Recovered Fiber Pulping Line operation for each month; and

- (o) Summary of facilitywide air pollutant emissions for the reporting period, and total emissions for the preceding 12-month period.

SWCAA 400-105(1)

R5. Emission Inventory Reports

ADP 21-3452 Condition 17

The permittee shall submit an inventory of annual emissions for each calendar year to SWCAA by March 15th of the following year in accordance with SWCAA 400-105, unless an alternate date is approved by SWCAA. The inventory shall include stack and fugitive emissions of NO_x, SO₂, CO, VOC, PM, PM₁₀, PM_{2.5}, hazardous air pollutants, and toxic air pollutants as defined in WAC 173-460 (*effective 8/21/98*). Each inventory report must be certified by a responsible official consistent with WAC 173-401-520.

R6. Greenhouse Gas Emission Reports

WAC 173-441-050, -060, -070

The permittee shall prepare and submit an annual report of greenhouse gas (GHG) emissions to Ecology and SWCAA by March 31st of the following calendar year. Each annual report shall contain the information specified in WAC 173-441-050(3). The permittee shall submit a revised annual report within 45 days of discovering that a previously submitted annual report contains one or more substantive errors.

The report and certificate or representation must be submitted in accordance with the requirements of WAC 173-441-050 and 173-441-060 and in a format specified by Ecology. Each annual report and any other submission under Chapter 173-441 WAC shall be certified, signed, and submitted by the designated representative or any alternate designated representative.

Each submission under Chapter 173-441 WAC shall include the following certification statement signed by the designated representative or any alternate designated representative:

"I am authorized to make this submission on behalf of the owners and operators of the facility or supplier, as applicable, for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

R7. Annual Compliance Certification

WAC 173-401-630(5)

The permittee shall submit to SWCAA and EPA a certification of compliance with all terms and conditions of this permit in accordance with WAC 173-401-630(5)(d). Each compliance certification must be certified by a responsible official consistent with WAC 173-401-520.

The permittee shall submit the following information by March 15th for the previous calendar year:

- (a) Identification of each term or condition of the permit that is the basis of the certification;
- (b) Statement of compliance status;
- (c) Whether compliance was continuous or intermittent;
- (d) Method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615;
- (e) Such other facts as SWCAA may require to determine the compliance status of the source; and
- (f) Such additional requirements as may be specified pursuant to Sections 114(a)(3) and 504(b) of the FCAA.

SWCAA 400-106(1)(g)

R8. Emission Test Reports

Order 98AQ-I046, Appendix A

The permittee shall report the results of required emission testing to SWCAA within 45 days of test completion. Emission test results shall be corrected to units that correspond to applicable emission limits and/or standards.

X. NON-APPLICABLE TERMS AND CONDITIONS

The following lists all federal, state, and/or local requirements that might reasonably apply to the permittee but are deemed nonapplicable after review by SWCAA. In accordance with WAC 173-401-640, the permittee is provided a permit shield for not complying with the requirements listed below where they have been identified to be non-applicable to specific emission units.

Standards of Performance for Volatile Organic Liquid

Storage Vessels for Which Construction, Reconstruction,

40 CFR 60, Subpart Kb

N1. or Modification Commenced After July 23, 1984

SWCAA 400-115

Subpart Kb establishes performance standards for volatile organic liquid storage vessels with a capacity greater than or equal to 75 cubic meters that are constructed, reconstructed, or modified on or after September 8, 1994. None of the tanks at this facility with a capacity greater than or equal to 75 cubic meters are used to store volatile organic liquids so this regulation is not applicable.

National Emission Standards for Hazardous Air Pollutants

40 CFR 63, Subpart Q

N2. for Industrial Process Cooling Towers

SWCAA 400-075

Subpart Q establishes performance standards for all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals on or after September 8, 1994. This facility does not use chromium-based water treatment chemicals so this regulation is not applicable.

National Emission Standards for Hazardous

Air Pollutants for Major Sources: Industrial,

40 CFR 63, Subpart DDDDD

N3. Commercial, and Institutional Boilers and Process Heaters

SWCAA 400-075

Subpart DDDDD establishes performance standards for all new, reconstructed, and existing industrial, commercial, and institutional boilers and process heaters located at a major source of HAP. The paper machines at NORPAC utilize natural gas direct-fired air caps for drying paper. These air cap dryers do not meet the definition of "process heaters" so this regulation is not applicable.

National Emission Standards for Hazardous Air Pollutants: 40 CFR 63, Subpart GGGGG
N4. Site Remediation SWCAA 400-075

Subpart GGGGGG establishes emissions limitations and work practice standards site remediation activities located at a major source of HAP. There are no remediation activities subject to the rule at this facility, so this regulation is not applicable.

N5. Compliance Assurance Monitoring 40 CFR 64

40 CFR 64 establishes criteria that define what monitoring should be conducted by a source owner or operator to provide a reasonable assurance there is compliance with emission limits and standards in order to certify compliance under the Title V operating permit program. The equipment listed below has been reviewed for CAM applicability.

Facility Baghouses. The Longview complex operates several baghouses and particulate filters that provide PM control. The following baghouses are needed to meet established particulate concentration-based emission limits:

- Soap silo baghouse
- Starch silo baghouse
- Old Newsprint baghouse

These baghouse systems meet the definition of “control devices” and are installed for compliance with an applicable standard so potential pre-control device emissions of each regulated air pollutant are calculated to determine if the emissions are equal to or greater than the amount required for the unit to be classified as a major source. Potential uncontrolled emissions are less than major source thresholds for all of the baghouses, so CAM is not required.

The following table provides potential pre-control device emissions for the soap and starch silo baghouses. Pre-control emissions are approximated using potential controlled PM10 emissions estimates and assumed baghouse control efficiency.

Potential Pre-Control Emissions of PM₁₀ From Silo Baghouses^a

| Emission Unit | Potential Controlled PM₁₀ Emissions^b (tpy) | Control Efficiency^c (%) | Potential Uncontrolled PM₁₀ Emissions (tpy) |
|------------------------|---|---|---|
| Soap Silo baghouse | 0.02 | 99.9 % | 20.0 |
| Wet End Starch Silo | 0.01 | 99.9% | 10.0 |
| Size Press Starch Silo | 0.01 | 99.9% | 10.0 |

^a Please note that PM₁₀ is used for applicability given that it is the “regulated air pollutant” as provided in 40 CFR 64.2(3) and addressed in the October 16, 1995 EPA memorandum that established PM₁₀ as the regulated air pollutant for purposes of determining “which sources or particulate matter are subject to minimum Title V requirements and fee calculations.”

^b Controlled emissions are determined using Table 5-1 (Base Operating Scenario) of the original Title V permit application.

^c Control efficiencies representative of upper limit for fabric filter PM control efficiency from the U.S. EPA’s CAM workshop control device technology slides (10/20/2004).

The following table provides potential pre-control device emissions for the Old Newsprint Baghouse. Pre-control device emissions are approximated using maximum baghouse inlet flow rates and relevant grain-loading emission factors, as well as the appropriate particle size distribution factor provided by the U.S. EPA for woodworking waste collection operations (52.9 % of particulate matter has an aerodynamic particle diameter of less than 10.0 μm)¹. The following equation is used to calculate pre-control potential PM10 emissions:

Potential Pre-Control Emissions of PM₁₀ From ONP Baghouse

| Emission Unit | Flow Rate^a (acfm) | Uncontrolled Emission Factor (gr/dscf) | Potential Uncontrolled PM₁₀ Emissions (tpy) |
|----------------------|---|---|---|
| ONP Baghouse | 45,700 | 0.02 ^b | 17.7 |

^a Value represents the maximum flow rates at the inlet of the baghouses as provided by Weyerhaeuser Longview. In order to be conservative, flow rates left in acfm (rather than conversion to dscfm).

^b Emission factor is based on the SWAPCA Order of Approval for the equipment.

TMP Pulping Heat Recovery Process. The heat recovery process associated with the TMP pulping operation acts as a control device that condenses VOCs and scrubs particulate matter from the exhaust streams of the refiners. However, the primary purpose of this process is not for air pollution control. Rather the heat recovery system is in operation to improve process efficiency by recycling steam and heat, and thus satisfies the definition of “inherent process equipment.” As such, the unit does not meet the definition of a “control device” under CAM and fails to satisfy the second criterion for CAM applicability. Therefore, the unit is not subject to CAM.

N6. Mandatory Greenhouse Gas Reporting (Federal)

40 CFR 98

40 CFR 98 establishes mandatory reporting requirements for greenhouse gas (GHG) emissions from selected stationary source categories in the United States. Pursuant to 40 CFR 98.3, facilities subject to this regulation must submit GHG emissions reports to the Administrator, as specified in paragraphs (a) through (g) of that section, for calendar year 2010 and each subsequent calendar year. This regulation was proposed on April 10, 2009 (74FR16609) and finalized on September 22, 2009. In the preamble of the final promulgation, EPA responded to a question regarding whether the reporting requirements constitute an applicable requirement for the purposes of Title V. The response indicates that they are not.

As currently written, the definition of "applicable requirement" in 40 CFR 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208. <http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

General Standards for Maximum Emissions

N7. Fugitive Emissions

SWCAA 400-040(3)(b)

This regulation requires material handling, construction, demolition, or any other operation that emits fugitive emissions and has been identified as a significant contributor to a nonattainment area to use reasonable and available control methods to control emissions of air contaminants for which the area is

¹ U.S. EPA AP-42 Appendix B-1 “Part I-Particle Size Distribution Data and Sized Emission Factors for Selected Sources – October 1986” Section 10.5.

designated nonattainment. This facility does not have any operations identified as a significant contributor to a nonattainment area, so this regulation is not applicable.

General Standards for Maximum Emissions

N8. Fugitive Dust Sources SWCAA 400-040(8)(b)

This regulation requires existing stationary sources of fugitive dust that has been identified as a significant contributor to a PM₁₀ or PM_{2.5} nonattainment area to use Reasonably Available Control Technology (RACT) to control emissions. This facility does not have any operations identified as a significant contributor to a nonattainment area, so this regulation is not applicable.

Emission Standards and Controls for

N9. Sources Emitting Volatile Organic Compounds SWCAA 490

This regulation establishes technically feasible and reasonably attainable emission standards for volatile organic compound (VOC) emissions from sources located in, or operating within, designated ozone nonattainment areas and areas covered by a maintenance plan within the jurisdiction of SWCAA. This facility is not located in a designated ozone nonattainment area or a maintenance plan area, so this regulation is not applicable.

N10. Source Registration Program SWCAA 400-100

SWCAA 400-100 implements SWCAA's source registration program. Pursuant to SWCAA 400-100(1)(b) sources subject to the Air Operating Permit program (WAC 173-401) are exempt from the registration program. Therefore, the registration program is not applicable to this facility.

N11. Requirements for Sources in a Maintenance Plan Area SWCAA 400-111

The permittee is not located in a maintenance plan area for any criteria pollutant; therefore, this regulation is not applicable.

N12. Requirements for New Sources in Nonattainment Areas SWCAA 400-112

The permittee is not located in a nonattainment area for any criteria pollutant; therefore, this regulation is not applicable.

N13. Bubble Rules SWCAA 400-120

The permittee has not requested an emission bubble for any regulated pollutant. Therefore, this regulation is not applicable.

N14. Emission Reduction Credits SWCAA 400-130, 400-131, 400-136

The cited rule sections govern the creation, maintenance, and use of emission reduction credits within the Agency's jurisdiction. The permittee has not requested to create or use any emission reduction credits (ERCs). Therefore, this regulation is not applicable.

APPENDIX A
Old Newsprint Baghouse – Emission Testing Requirements

1. Introduction:

- a. A minimum of three test runs at normal operating conditions shall be performed.
- b. SWCAA personnel shall be informed at least two days prior to testing so that they may be present during testing.
- c. Testing shall include, but not necessarily be limited to the constituents identified in Section 2 below as a minimum.

2. Testing Requirements:

- | | |
|---|---|
| a. Constituents to be measured: | Test Methods or Equivalent: |
| 1. Volumetric flow rate, gas velocity and temperature | EPA Methods 1 & 2 |
| 2. Moisture content of stack gas | EPA Method 4 |
| 3. Particulate Matter (PM & PM ₁₀) | EPA Method 5 (front half) or EPA Method 17 or Equivalent Method |
| 4. Opacity | EPA Method 9 |
- b. Process Points to Be Tested:
 1. Outlet of the baghouse exhaust stack for all constituents

3. Source Operation:

- a. A complete record of production related parameters including process startups, shutdowns, and adjustments shall be kept during emissions testing to correlate operations with emissions and shall be recorded in the test results final report.
- b. Source operations during the emissions test must be representative of normal intended operating conditions.

4. Reporting:

- a. A final emission test report shall be prepared and submitted to SWCAA within 45 calendar days of test completion.
- b. The test report shall include a summary of emissions, test conditions, operational status, ambient conditions, test equipment calibration information, copies of actual data sheets, discussion of any operations or testing problems or conditions that would influence test data or result in the data not being representative of intended operating conditions.

**APPENDIX B
NORPAC Emission Factors**

TABLE 1 - NORPAC I & II VOC EMISSION FACTORS, DAILY AND ANNUAL EMISSION RATES

| Source | Estimated Maximum Production Rate (daily) | Estimated Maximum Production Rate (yearly) | VOC Emission Factor | VOC Emissions (lb/day) | VOC Emissions (tons/year) |
|--|---|--|----------------------|------------------------|---------------------------|
| TMP #1 Process Vents Reboiler Online | Pulp production, 1080 (BDMT/day) | Pulp production, 374,490 (BDMT/year) | 0.340 (lb C/BDMT) | 367 | 63.7 |
| TMP #1 Process Vents Reboiler Down | Pulp production, 0 (BDMT/day) | Pulp production, 0 (BDMT/year) | 0.319 (lb C/BDMT) | 0 | 0.0 |
| TMP #2 Process Vents Reboiler Online | Pulp production, 1080 (BDMT/day) | Pulp production, 374,490 (BDMT/year) | 0.340 (lb C/BDMT) | 367 | 63.7 |
| TMP #2 Process Vents Reboiler Down | Pulp production, 0 (BDMT/day) | Pulp production, 0 (BDMT/year) | 0.319 (lb C/BDMT) | 0 | 0.0 |
| TMP Pressure Relief Valves B&C Open | Pulp production, 1080 (BDMT/day) | Pulp production, 149,796 (BDMT/year) | 0.124 (lb C/BDMT) | 268 | 9.3 |
| PM 1 | Gross Product, 1,000 (ADMT/day) | Gross Product, 346,750 (ADMT/year) | 0.457 (lb C/ADMT) | 457 | 79.2 |
| PM 2 | Gross Product, 1,200 (ADMT/day) | Gross Product, 416,100 (ADMT/year) | 0.457 (lb C/ADMT) | 548 | 95.1 |
| Total NORPAC I & II VOC Emissions | | | | 2,007 | 311.0 |

TABLE 2 - NORPAC I & II CO EMISSION FACTORS AND ANNUAL EMISSION RATES

| Source | Estimated Maximum Production Rate (yearly) | CO Emission Factor | CO Emissions (tons/year) |
|--|--|----------------------------------|--------------------------|
| TMP 1 | Pulp production, 374,490 (BDMT/year) | 0.805 (lb/BDMT) | 150.7 |
| TMP 2 | Pulp production, 374,490 (BDMT/year) | 0.805 (lb/BDMT) | 150.7 |
| PM 1 | 432 (MMcuft/year) | 15.2 (lb/ MMcuft Natural Gas) | 3.3 |
| PM 2 | 385 (MMcuft/year) | 15.2 (lb/ MMcuft Natural Gas) | 2.9 |
| Total NORPAC I & II CO Emissions (Tons/yr) | | | 307.6 |