

AIR EMISSION PERMIT NO. 00900011- 001

IS ISSUED TO

International Paper

International Paper - Sartell
100 East Sartell Street
Sartell, Stearns County, MN 56377

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	April 1995; Revised July 2002

This permit authorizes the permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Part 70

Issue Date: June 11, 2003

Expiration: June 11, 2008

All Title I Conditions do not expire.

Michael (Mike) J. Tibbetts
Major Facilities Section Manager
Majors and Remediation Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

MJT/GK:lmg

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

International Paper, Sartell is a thermo-mechanical pulp (TMP) and paper mill. The mill currently manufactures a variety of coated and uncoated paper products. Operations at the mill include wood storage and processing, thermo-mechanical pulp mill with pulp brightening equipment, paper mill, finishing and shipping facilities, a wastewater treatment system, and a power plant.

Thermo-mechanical pulping includes steam and mechanical refining to produce the pulp. On-site boilers provide steam for the TMP process. The pulp is brightened using water and chemicals before being stored or transferred to the mill's three paper machines. The paper is finished or trimmed and cut to size, prior to shipment to customers.

Emissions from the facility include particulates from coal, lime, and ash handling and/or burning; and SO₂, NO_x, CO and HAPs from the coal and natural gas fired boilers.

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
PENDING NESHAPS	hdr
Comply with "Industrial, Commercial and Institutional Boiler" category standards as it applies, pending promulgation.	40 CFR 63, subp. DDDDD
By the date specified in 40 CFR 63.52(e), submit to the MPCA Part 2 MACT Hammer notifications meeting the requirements of 40 CFR Section 63.53(b).	40 CFR Section 63.52(e)
PROMULGATED NESHAP	hdr
Comply with the "Paper and Other Webs Coating" category standards in 40 CFR 63.3370 as it applies, by the compliance date of December 5, 2005 for the "affected source". Complete performance testing required in 40 CFR 63.3360 within 180 days of the compliance date. On or before December 5, 2004, submit to the EPA and the MPCA an initial notification for the "affected source" per 40 CFR 63.3400(b)(1). At the time of permit issuance, the Subpart JJJJ "affected source" includes TMP Refining (EU 027) and TMP Screening and Cleaning (EU 028).	40 CFR 63, subp. JJJJ
PULP AND PAPER PRODUCTION NESHAP	hdr
The provisions of 40 CFR 63.440 apply to the owner and operator of processes that produce pulp, paper, or paperboard; that are located at a plant site that is a major source. For mechanical pulping processes using wood, the affected source is the total of all HAP emission points in the bleaching system. Because the facility does not have a chlorine bleaching system, the bleaching system is exempt from the requirements of 40 CFR 63.445, but the general provisions of 40 CFR Part 63, subpart A do apply as per 40 CFR 63.440(g).	40 CFR 63, subp. S
OPERATIONAL REQUIREMENTS	hdr
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Air Pollution Control Equipment: The permittee shall at all times properly operate and maintain the facilities and systems of treatment and control and the appurtenances related to them which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
FUGITIVE EMISSIONS CONTROL	hdr
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150

TABLE A: LIMITS AND OTHER REQUIREMENTS

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Facility Name: International Paper - Sartell

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Fugitive Emissions Control Plan: The Permittee shall submit a fugitive emissions control plan within 60 days of the date of permit issuance for review by the Commissioner. The plan shall identify all fugitive emission sources, primary and contingent control measures, and recordkeeping. The control measures included in the plan must include the requirements of Minn. R. 7011.1105. The Permittee shall follow the actions and recordkeeping specified in the control plan. The plan may be amended by the Permittee. All changes to the plan shall be recorded on-site and available for MPCA review.	Minn. R. 7011.0150; Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and recordkeeping specified in the control plan. The plan may be amended by the permittee if the changes are recorded onsite and the plan is available for MPCA review at any time. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, Minn. R. 7011.1105 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner.	Minn. R. 7011.0150; Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Calibrate all required monitoring equipment annually or at the frequency recommended by the manufacturer (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

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Facility Name: International Paper - Sartell

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Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovering, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
MISCELLANEOUS REQUIREMENTS	hdr
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: GP 001 Industrial Process Equipment**Associated Items:** EU 009 B & W Boiler Ash Handling System

EU 010 B & W Boiler Ash Silo

EU 011 Rail Lime Receiving

EU 012 Lime Silo

EU 020 Starch Silos

EU 026 Chip Cyclones

What to do	Why to do it
LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
FABRIC FILTERS	hdr
Monitoring Equipment: The Permittee shall maintain the necessary monitoring equipment for measuring and recording pressure drop on all pressurized fabric filters. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7007.0800, subp. 4
Monitor and record the pressure drop for the baghouses on emission units EU009, EU020 and EU026 at least once every 24 hours when the emitting unit is in operation.	Minn. R. 7007.0800, subp. 2 and 14
Visible Emissions: For the passive fabric filters on EU 010, EU 011, and EU 012 conduct a visible emissions check at least once per month when the corresponding emission unit is being loaded or unloaded.	Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified in the O & M plan.	Minn. R. 7011.0715
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the recommended range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: GP 002 Coal Handling Units**Associated Items:** CE 001 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 005 Coal transfer

EU 007 Coal Crusher

EU 008 B&W Coal Bunker

What to do	Why to do it
Opacity: less than or equal to 20.0 percent opacity . The Permittee shall monitor pressure drop readings across the baghouse and record pressure drop data at least once each week when the equipment is in operation.	40 CFR 60.252(c); Minn. R. 7011.1150
During freezing temperatures, the Permittee shall not be required to apply water or dust suppressants.	Minn. R. 7011.1120
The Permittee shall not conduct any nonessential coal handling operations that are not shielded from the wind or enclosed in a building when steady wind speeds exceed 30 miles per hour as determined at the nearest official station of the United States Weather Bureau or by wind speed instruments on or adjacent to the site.	Minn. R. 7011.1125
The Permittee shall not use surface hardening agents, wetting or chemical agents, foam agents, and oils that may cause ground water or surface water contamination in violation of any applicable water pollution law.	Minn. R. 7011.1140

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 001 Wood Processing Operations

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. (This is met because the potential to emit from this unit is 0.15 lbs/hr or 0.0022 grains/dry standard cubic meter)	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 006 B & W Boiler**Associated Items:** CE 005 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones

CE 006 Venturi Scrubber

What to do	Why to do it
GENERAL CONDITIONS	hdr
Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	40 CFR Part 60, Subpart D; Minn. R. 7011.0555
The General Provisions 40 CFR Part 60 Subpart A, 60.1 to 60.19 apply to EU006	40 CFR Part 60 Subpart A
OPERATIONAL REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.10 lbs/million Btu heat input	40 CFR Part 60.42(a)(1)
Sulfur Dioxide: less than or equal to 1.2 lbs/million Btu heat input	40 CFR Part 60.43(a)(2)
Nitrogen Oxides: less than or equal to 0.70 lbs/million Btu heat input	40 CFR Part 60.44(a)(3)
Opacity: less than or equal to 20.0 percent opacity except for one six-minute period per hour of not more than 27 percent opacity.	40 CFR Part 60.42(a)(2)
The opacity standards set forth in 40 CFR, Part 60.11(c) shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.	40 CFR Part 60.11(c)
Mercury: less than or equal to 7.1 pounds of mercury per 24-hour period.	40 CFR 61.52(b)
The Permittee is authorized to burn as fuel in EU006 subbituminous coal, bituminous coal, natural gas, wood residue, on-site generated sludge, on-site generated petroleum derived waste oil and petroleum distillate solvents, and tire derived fuel (TDF). The firing of TDF is limited to a maximum of 8% of the total heat input from TDF, wood waste, and coal combined.	Minn. R. 7007.0800, subp. 2, and MPCA Letter dated November 21, 1990
When burning TDF, the Permittee shall record and maintain records of the amount of each fuel combusted each day. Calculate, record and maintain records of the percent of TDF compared to the total heat input from TDF, wood waste, and coal.	
On-site generated petroleum derived waste oil and petroleum distillate solvents must meet the following specifications: Minimum gross heating value: 125,000 Btu/gal Minimum flash point: 120 Degrees F Maximum ash: 1.0 % by weight Maximum lead: 0.4 % by weight Maximum sulfur: 1.8 % by weight Maximum PCB: 50 ppm by weight Maximum elemental halogens, excluding inorganic halogens: 0.5 % by weight pH: 4.0 - 10.0	Minn. R. 7007.0800, subp. 2
PERFORMANCE TESTING	hdr
Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The Permittee shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.	40 CFR Part 60.8(c)
MONITORING REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide.	40 CFR Part 60.45(a)
As an alternative to operating a COMS, the Permittee shall monitor and record scrubber pressure drop and scrubber liquid flow rate. Maintain and calibrate the equipment according to manufacturer's recommendations and instructions and as described in 40 CFR 60.143(b).	40 CFR Part 60.13(i)(1)
Conduct daily fuel sampling and analysis to determine compliance with SO2 limit, beginning within 2 operating days whenever the SO2 monitor is out of service or out of calibration. Collect separate coal and wood waste (wood, bark, sludge) samples in accordance with an approved ASTM method. Calculate SO2 emissions using estimated % removal based on available performance indicators. Submit emissions calculations based on fuel sampling in the quarterly report.	Minn. R. 7007.0800, subp.4

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Conduct a sampling and analysis program to demonstrate that petroleum derived waste oil and petroleum distillate solvents to be burned as fuel in EU006 meet the specifications listed above. For quantities of petroleum derived waste oil and petroleum distillate solvents that total less than 10,000 gallons per calendar quarter, a composite sample may be taken throughout the year and analyzed at the end of the calendar year. Total usage in gallons burned shall be reported on the quarterly report.	Minn. R. 7007.0800, subp.4
RECORDKEEPING	hdr
The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Part 60.7(b)
Compliance Demonstration: The Permittee shall observe and record once per operating day the multiclone pressure drop, scrubber pressure drop, and scrubber liquid flow rate. Operate and maintain control devices as per Minn. R. 7011.0070 to 7011.0080.	40 CFR Part 60.42(a)(1) and (2)
MERCURY TRIGGER LEVEL	hdr
Mercury: less than or equal to 0.5 ppm average sludge concentration using a 12 month rolling average. This is a state-only requirement and is not enforceable by the EPA Administrator, nor subject to the citizen suit provisions of section 304 of the Clean Air Act, 42 U.S.C. section 7604.	Minn. R. 7007.0800, subp. 2
Performance Test: due 60 days after end of each 48 months following Performance Test for mercury, the Permittee shall test for mercury in the sludge. The performance test for mercury is to determine the mercury concentration in the wastewater treatment sludge that is to be burned.	Minn. R. 7017.2020, subp. 1
Performance Test Notifications and Submittals; Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-Test Meeting: due 7 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 day after each Performance Test. The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2
If the mercury trigger level is exceeded, the permittee shall retest within 30-days of receipt of results to check for false/positive results. If exceedance of the trigger level is confirmed in the retest, the permittee shall submit and begin implementing a mercury reduction plan within 60 days of the confirmation of the exceedance. The plan shall include the reasons for increased mercury loading and the pollution prevention and other relevant mercury reduction activities to minimize the effects of the above. This is a state-only requirement and is not enforceable by the EPA Administrator, nor subject to the citizen suit provisions of section 304 of the Clean Air Act, 42 U.S.C. section 7604.	Minn. R. 7007.0800, subp. 2
MULTIPLE CYCLONE (CE 005)	hdr
Pressure Drop: greater than or equal to 3.0 inches of water column using 3-hour Rolling Average , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp.4
VENTURI SCRUBBER (CE 006)	hdr
Water flow rate: greater than or equal to 2200 gallons/minute using 3-hour Average , unless a new value is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp. 4
Pressure Drop: greater than or equal to 13 inches of water column using 3-hour Rolling Average , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp. 4
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 009 B & W Boiler Ash Handling System**Associated Items:** CE 008 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 026 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

GP 001 Industrial Process Equipment

What to do	Why to do it
The Permittee is authorized to install pneumatic ash unloading system and a dedicated baghouse to EU 009 the B&W Boiler Ash Handling System. The construction authorization expires 18 months after permit issuance. The Permittee must keep a record of the dates of installation and start-up on site. The Permittee may apply for an extension of the construction authorization deadline by following the Administrative Amendment provisions in Minn. R. 7007.1400.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

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Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 015 Wickes Boiler**Associated Items:** CE 015 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers

What to do	Why to do it
LIMITS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20.0 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Sulfur Dioxide: less than or equal to 4.0 lbs/million Btu heat input when burning solid fuels.	Minn. R. 7011.0510, subp. 1
OPERATIONAL REQUIREMENTS	hdr
When burning fuels other than natural gas, observe and record once per operating day the pressure drop on the cyclone CE015. Operate and maintain control devices as per Minn. R. 7011.0070 to 0080.	Minn. R. 7011.0510
When burning fuels other than natural gas, calculate SO ₂ emissions on a 30-day rolling average using estimated % removal based on available performance indicators and fuel sulfur analysis provided by the fuel supplier. Submit emissions calculations based on fuel sampling in the quarterly report.	Minn. R. 7011.0510
The Permittee is authorized to burn natural gas in EU015, or other fuels authorized by the MPCA. The Permittee is authorized to burn coal in EU015 after conducting a performance test demonstrating compliance with applicable permit limits. Coal firing shall be limited to the rate fired in the performance test. The Permittee shall provide a thirty-day written notice to the MPCA prior to conducting a performance test.	Minn. R. 7007.0800, subp. 2
MULTIPLE CYCLONE (CE 015)	hdr
Monitoring Equipment: The Permittee shall maintain the necessary monitoring equipment for measuring and recording pressure drop on the cyclone. The monitoring equipment must be installed, in use, and properly maintained when the cyclone is in operation.	Minn. R. 7007.0800, subp. 4
Monitor and record the pressure drop for the cyclone at least once every 24 hours when the cyclone is in operation.	Minn. R. 7007.0800, subp. 2 and 14
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading, and whether or not the pressure drop was within the range specified in the O & M plan.	Minn. R. 7011.0715
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the operating range; or - the cyclone is found during the inspections to need repair. Corrective actions shall return the pressure drop to within the recommended range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the cyclone. The Permittee shall keep a record of the type and date of any corrective action taken for the cyclone.	Minn. R. 7007.0800, subp. 4, 5, and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 016 North Power Plant Ash Handling System**Associated Items:** CE 016 Dust Suppression by Water Spray

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
Water spray shall be used to control particulate emissions whenever the ash handling system is in operation.	Minn. R. 7011.0715

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 017 North Power Plant Ash Silo**Associated Items:** CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0710, subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0710, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 018 Bros Boiler**Associated Items:** CE 013 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers

CE 014 Venturi Scrubber

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20.0 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Sulfur Dioxide: less than or equal to 4.0 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
The permittee is authorized to burn as fuel in EU018 subbituminous and bituminous coal, and other fuels authorized by the MPCA.	Minn. R. 7007.0800, subp. 2
MONITORING REQUIREMENTS	hdr
The Permittee shall observe and record once per operating day, the multiclone pressure drop, scrubber pressure drop, and scrubber liquid flow rates.	Minn. R. 7007.0800, subp. 4
Calculate SO2 emissions on a 30-day rolling average using estimated percent removal based on available performance indicators and fuel sulfur analysis provided by the coal supplier. Submit emissions calculations based on fuel sampling in the quarterly report.	Minn. R. 7011.0510
MULTIPLE CYCLONE (CE 013)	hdr
Observe and record once per operating day the multiclone pressure drop.	Minn. R. 7007.0800, subp.4
VENTURI SCRUBBER (CE 014)	hdr
Water flow rate: greater than or equal to 400 gallons/minute using 3-hour Rolling Average unless a new value is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7011.0510, subp. 1
Pressure Drop: greater than or equal to 6.5 inches of water column using 3-hour Rolling Average unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7011.0510, subp. 1
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 019 Package Boiler

What to do	Why to do it
The Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.	40 CFR 60.48c(a)
The Permittee shall record and maintain records of the amount of fuel combusted each day.	40 CFR 60.48c(g)
The Permittee is authorized to burn only natural gas in EU019 during outages of any boiler (EU006, EU015, EU018) including the time necessary to take the boilers off-line and bring them back into service.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 021 SCA Paper Machines**Associated Items:** CE 025 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
The Permittee shall administer good operating and maintenance practices to minimize particulate matter emissions from the paper machine trim system.	Minn. R. 7011.0715, Subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 024 Paper Machine 3

What to do	Why to do it
Production: less than or equal to 800 tons/day using 12-month Rolling Average (machine finished tons/day). Record the paper produced daily. Calculate and record the monthly average and the 12-month rolling average by the 10th day of the month for the previous month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption: Engineering calculations were provided in support of Amendment No. 2 to Permit No. 1004A-84-OT-1 which show that emissions from the boilers will not increase as a result of the No. 3 Paper Machine modification due to the steam savings projects undertaken at the same time. To demonstrate that these steam savings projects are operating at the efficiencies presented in the application the Permittee shall:</p> <p>i. Record the dryer steam use continuously (which consists of the main dryers, thermocompressor, overly dryers). Annually calculate the steam used by the No. 3 Paper Machine Dryers. The steam calculations shall be completed within one month after the completion of each 12-month period.</p> <p>Continued below:</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption, Continued:</p> <p>ii. Within 30 days after the completion of the annual steam consumption calculations for the No. 3 Paper Machine Dryers, submit a report to the MPCA that compares the annual dryer steam consumption and the annual heat recovered at the TMP Heat Exchanger to the calculations presented in the PSD Avoidance application. If the calculated annual No. 3 Paper Machine Dryer steam usage is greater than (1.98 x 10 to the 6th pounds per day x number of operating days per year for the No. 3 Paper Machine) pounds per year, as a part of the report the permittee must: determine if there is excess heat recovered during the previous 12 months at the TMP heat exchanger to account for this.</p> <p>Continued below:</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption, Continued:</p> <p>Excess heat recovered at the TMP heat exchanger would be any heat recovered that is greater than (203 MMBtu per day x number of operating days per year for the No. 3 Paper Machine) MMBtu per year. If there is not excess heat recovered at the TMP heat exchanger to account for the dryer usage, the Permittee shall submit an explanation within 15 days from the submittal of the Annual Energy Audit.</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas from the IR Dryer unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20.0 percent opacity from the IR Dryer except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0610, subp. 1(A)(2)
The Permittee is authorized to burn only natural gas in the IR Dryer of EU024.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 027 TMP Refining**Associated Items:** CE 024 Regenerative Thermal Oxidizer

What to do	Why to do it
LIMITS	hdr
TMP Heat Exchanger Energy Recovery: The heat recovered must be greater than (203 MMBtu per day x the number of operating days per year for the No. 3 Paper Machine) MMBtu per year based on a 12-month rolling sum calculated monthly. The Permittee shall monitor the water flow rate and the water temperature rise across the heat exchanger daily while the TMP area is in operation. Once each day during operation, calculate the heat transferred from the TMP high grade heat recovery stacks to the water in units of MMBtu per day.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
The Permittee is authorized to burn only natural gas in CE 024.	Minn. R. 7007.0800, subp. 2
REGENERATIVE THERMAL OXIDIZER (CE 024)	hdr
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Volatile Organic Compounds: greater than or equal to 85 percent control efficiency	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21; Minn. R. 7007.0800, subp. 2 and 14
Maintain an outlet emission rate for Volatile Organic Compounds: less than or equal to 0.10 lbs/ton of product (dry basis) using 12-month Rolling Average	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall operate and maintain the thermal oxidizer any time that any process equipment controlled by the thermal oxidizer is in operation except during breakdowns, malfunctions, repairs, and periodic maintenance on the RTO.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
Temperature: greater than or equal to 1555 degrees F using 3-hour Rolling Average at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the three-hour rolling average temperature drops below the minimum temperature limit, the VOC emissions during that time shall be considered uncontrolled until the average temperature limit is once again achieved. This shall be reported as a deviation.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. The recording device shall also calculate the three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
RECORDKEEPING	hdr
Based on the results of the most recent performance test, calculate and record the monthly average and 12-month rolling average and the emission rate by the 10th day of the month for the previous month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings and calculated three hour rolling average temperatures for the combustion chamber.	Title I Condition: Monitoring for Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

MONITORING	hdr
Daily Monitoring: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
PERFORMANCE TESTING	hdr
Performance Test: due before 05/17/2005 for VOC emissions and destruction efficiency. Test plan dated 7/24/00 proposes 60-month testing frequency.	Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 028 TMP Screening and Cleaning

What to do	Why to do it
Production: less than or equal to 468 tons/day (Air Dried Tons of Pulp Per Day [ADTP/Day]) from both thermomechanical pulping (TMP) lines averaged over a calendar month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
The Permittee shall keep daily records of pulp production in air dried tons of pulp from the combination of both TMP lines. By the 10th day of each calendar month, the Permittee shall calculate and record the average daily TMP production from both lines combined for the previous calendar month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 032 Welding Generator

What to do	Why to do it
Opacity: less than or equal to 20.0 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

Subject Item: EU 034 Diesel Pump Engine

What to do	Why to do it
The Permittee is authorized to install a diesel engine for a pump for the wastewater treatment plant lift station and for use as a back-up generator. The construction authorization expires 18 months after permit issuance. The Permittee must keep a record of the dates of installation and start-up on site. The Permittee may apply for an extension of the construction authorization deadline by following the Administrative Amendment provisions in Minn. R. 7007.1400.	Minn. R. 7007.0800, subp. 2
Opacity: less than or equal to 20.0 percent opacity	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300, subp. 2
Fuel Type: No. 2 distillate fuel only, by design.	Minn. R. 7005.0100, subp. 35a
Recordkeeping: The Permittee shall maintain records of the hours of operation of the engine and keep them on-site.	Minn. R. 7007.0800, subp. 4 & 5

TABLE B: SUBMITTALS

06/11/03

Facility Name: International Paper - Sartell
Permit Number: 00900011 - 001

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Protocol	due 1,096 days after Permit Issuance for PM10 and SO2. This protocol will describe the proposed modeling methodology and input data, in accordance with MPCA modeling guidance for Title V air dispersion modeling analyses. The protocol will be based on projected operating conditions under the next permit term. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Computer Dispersion Modeling Results	due 1,462 days after Permit Issuance for PM10 and SO2. To be submitted after the MPCA has reviewed and approved the modeling protocol. The submittal should adhere to MPCA modeling guidance for Title V air dispersion modeling analyses. This is a state-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility

TABLE B: RECURRENT SUBMITTALS

06/11/03

Facility Name: International Paper - Sartell

Permit Number: 00900011 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 00900011-001

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Telephone Number	Facility Address SIC Code: 2621
International Paper 400 Atlantic Street Stamford, CT 06921	100 East Sartell Street Sartell, Minnesota Stearns County 320-240-7182

1.2. Description of the facility:

International Paper operates a thermo-mechanical pulp (TMP) and paper mill in Sartell, Minnesota. The mill site includes 66 acres adjacent to the Mississippi River. The mill converts hardwood and softwood logs into wood pulp and paper through a variety of process operations.

Logs are received at the mill from rail or truck delivery systems, sorted and stored and transferred to the subsequent operations. Logs are first debarked and then processed through a chipping and screening operation. The chips are stored and/or directly transferred to the TMP operation. The TMP process uses steam and mechanical processing to produce pulp. Steam from the TMP process is provided by one of three on-site boilers operated in the Utilities area. The boilers are capable of burning a variety of fuels including natural gas, wood waste, coal and/or sludge, and specification waste oil.

The pulp produced in the TMP process is washed and brightened using water and chemicals. The brightened pulp is stored and transferred to one of three paper machines. The paper machines produce a variety of paper grades using the pulp on-site or a blend of kraft or other imported materials. The mill also contains a finishing area where paper is trimmed and cut to size prior to shipment to off-site customers. Emissions from the facility include particulates from coal, lime, and ash handling and/or burning; and SO₂, NO_x, CO and HAPs from the coal and natural gas fired boilers.

1.3 Description of any changes allowed with this permit issuance:

International paper is authorized to add a pneumatic unloading option to EU 009, the B&W Ash Handling System; and a diesel engine for a pump for the wastewater treatment system lift station.

- 1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit:

Permit Number and Issuance Date	Action Authorized
Amendment No. 1 to Permit No. 1004A-84-OT-1; 9/4/97	Modifications to the TMP Lines
Amendment No. 2 to Permit No. 1004A-84-OT-1; 6/9/99	Upgrades to the No. 3 Paper Machine
Amendment No. 3 to Permit No. 1004A-84-OT-1; 4/10/00	Authorized trial burn of oat hulls in the B&W Boiler
Amendment No. 4 to Permit No. 1004A-84-OT-1	Addition and operation of temporary package boiler during annual B&W boiler outage

- 1.5. Facility Emissions:

Table 1. Total Facility Limited Potential to Emit Summary:

EU #	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
001	Wood Processing	0.67	0.67	-	-	-	31.7	-	-	-
005	Coal Transfer	10.74	10.7	-	-	-	-	-	-	-
006	B&W Boiler	50.4	10.1	695	699	1091	23.6	0.003	87	215
007	Coal Crusher	4.38	4.38	-	-	-	-	-	-	-
008	B&W Coal Bunker	4.82	4.82	-	-	-	-	-	-	-
009	B&W Ash System	22.1	22.1	-	-	-	-	-	-	-
010	B&W Ash Silo	11.5	11.5	-	-	-	-	-	-	-
011	Rail Lime Receive	20.8	20.8	-	-	-	-	-	-	-
012	Lime Silo	5.5	5.5	-	-	-	-	-	-	-
015	Wickes Boiler	355	156	828	208	118	3.3	.01	28	33
016	North Power Plant Ash Handling	5.5	5.5	-	-	-	-	-	-	-
017	North Power Plant Ash Silo	0.54	0.54	-	-	-	-	-	-	-

EU #	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
018	Bros Boiler	68.8	13.8	511	184	104	1.0	.01	25	28
019	Package Boiler	4.3	4.3	0.3	31	23.4	2.34	2.0E-	3.2E-	0.8
020	Starch Silos	33.1	33.1	-	-	-	-	-	-	-
021	SCA Paper Machines	83.6	83.6	-	-	-	72.2	-	3.1	5.5
024	#3 Paper Machine	0.1	0.1	.01	1.8	1.5	173	9.0E-	8.4	28.8
026	Chip Cyclones	106	106	-	-	-	-	-	-	-
027	TMP Refining	58.2	58.2	.004	0.7	0.6	7.2	1.0E-	2.8	6.2
028	TMP Screening	-	-	-	-	-	33.3	-	2.3	4.9
032	Welding Generator	0.4	0.4	1.84	5.8	231	11.4	-	-	-
034	Diesel Engine	2.67	2.67	2.49	37.6	8.1	3.05	-	-	-
	TOTAL	849	555	2038	1168	1578	362	0.023	87	322

	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	849	555	2038	1168	1578	362	0.023	87	322
Total Facility Actual Emissions	149	110	654	617	386	266	.0033	12	37.8

Table 2. Facility (TF) and Permit Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	PM, SO2, NO _x , CO, VOC		
NAAR			
Part 70 Permit Program	PM, SO2, NO _x , CO, VOC, HAPs		

2. Regulatory and/or Statutory Basis

2.1 Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

Regulatory Overview of Facility

EU, GRP, or SV #	Applicable Regulations	Comments:
GP001; EU001; EU016; EU021	Minn. R. 7007.0715	Standards of Performance for Post-1969 Industrial Process Equipment
GP002	Minn. R. 7011.1110	Standards of Performance For Existing Out-state Coal Handling Facilities. The baghouses are not required to meet the limits, so no pressure drop ranges are required in the permit.
EU006	40 CFR Part 60, Subpart D 40 CFR 61.52	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971. The provisions of this subpart are applicable to those stationary sources which incinerate or dry wastewater treatment plant sludge
EU015; EU018	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment
EU017	Minn. R. 7007.0710	Standards of Performance for Pre-1969 Industrial Process Equipment
EU019	40 CFR 60.48c	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
EU024; EU027; EU028	40 CFR 52.21	Prevention of Significant Deterioration. Production limits
EU024	Minn. R. 7011.0610	Standards of Performance for New Indirect Heating Equipment
EU032	Minn. R. 7011.2300	Standards of Performance For Stationary Internal Combustion Engines

2.2 Insignificant Activities

The Permittee listed several current insignificant activities in the permit application and supplemental submittals. The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities, and likely future ones, that might be located at this site.

Insignificant Activities

Insignificant Activity	Currently on site? (Y/N)	General Applicable Emission limit	Discussion
Space heaters fueled by kerosene, natural gas or propane	Y	PM, variable depending on airflow Opacity \leq 20% with exceptions (Minn. R. 7011.0610)	For these units based on the fuels used and published emissions factors, it is highly unlikely that they could violate the applicable requirement. These units are vented inside a building, so testing is not feasible.
Fuel use in furnaces or boilers with a capacity of less than 500,000 Btu/hr.	N	PM \leq 0.4 lb/MMBtu Opacity \leq 20 % (Minn. R. 7011.0610)	For these units based on the fuels used and EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Infrared electric ovens	N	Opacity \leq 20% (Minn. R. 7011.0110)	While no emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into the building, so monitoring or testing is not feasible.
Emissions from laboratory operations, as defined in Minn. R. 7007.1300, subp. 3(G)	N	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	These are very small, intermittent, bench-top operations that typically do not even have any emissions. It is highly unlikely that they could violate the applicable requirement.
Brazing, soldering or welding equipment	Y	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	Y	Opacity \leq 20% (Minn. R.	While no emissions estimation method exists for these units, based on general knowledge of how they operate, it is

Insignificant Activity	Currentl y on site? (Y/N)	General Applicable Emission limit	Discussion
		7011.0110)	highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into the building, so monitoring or testing is not feasible.
Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners	Y	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0610 + Minn. R. 7011.0715)	For these units, there are some factors available for the burners, but very little information regarding the cleaning operation itself. However, based on general knowledge of how they operate, it is highly unlikely that they could violate the applicable requirement or that testing would be feasible.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities	Y	PM, variable depending on airflow or process weight rate Opacity \leq 20% (Minn. R. 7011.0715)	While spray equipment will have the potential to emit particulate matter, these particular activities are those not associated with production, so they would be infrequent and usually occur outdoors. Testing or monitoring is not feasible.

3. Technical Information

Emissions Calculations are attached to the permit and in hard copy in the AQD files.

MPCA staff indicated to International Paper that the mercury limit in 40 CFR 61.52 of 7.1 pounds per day was not an acceptable limit given the States goals to reduce mercury emissions. Also, the measured actual emissions are so much lower than the federal limit that it would not be a risk for International Paper to accept a much lower limit or a trigger level. MPCA has added a trigger level to the permit to prevent mercury emissions from increasing. If the trigger level is exceeded, the permittee must submit and begin implementing a mercury reduction plan.

NESHAPs: Units at International Paper, Sartell are subject to one pending and two promulgated NESHAP. These NESHAPs are outlined below.

Comply with the pending NESHAP, 40 CFR pt. 63, subp. DDDDD "Industrial Boilers" category standards, as it applies, after promulgation as a final rule. International Paper is subject to the Industrial Boiler MACT Standards and they are not willing to accept synthetic minor limits. By the date specified in 40 CFR 63.52(e), International Paper must submit to the MPCA the Part 2 MACT Hammer notifications meeting the requirements of 40 CFR Section 63.53(b).

The Sartell Mill is an affected facility under 40 CFR 63 Subpart S; the Pulp and Paper Production (non-chemical) NESHAP (compliance 4/16/01). However, the Sartell mill uses no chlorine or chlorinated compounds for bleaching and is exempt from the standards in 40 CFR 63.445, but the general provisions of 40 CFR Part 63, subpart A do apply as per 40 CFR 63.440(g). The mill is in compliance with all provisions of Subpart S.

The Paper and Other Web Coating NESHAP, Subpart JJJJ was promulgated on December 5, 2002 and the compliance date is December 5, 2005. Comply with the "Paper and Other Web Coating" category standards, 40 CFR pt. 63, subp. JJJJ, as it applies, by the compliance date of December 5, 2005. Complete performance testing required in 40 CFR 63.3360 within 180 days of the compliance date. On or before December 5, 2004, provide information on which compliance demonstration option has been chosen for the "affected source" per 40 CFR 63.3400(b)(1). The Subpart JJJJ "affected source" includes TMP Refining (EU 027) and TMP Screening and Cleaning (EU 028).

Public Notice Comments: No comments were received during the public notice comment period. International Paper did send a comment letter after the comment period had ended. Some of the comments dealt with issues which we had discussed in the past and some of the comments were clarifications of periodic monitoring parameters which International Paper felt were not correct in the draft permit. MPCA agreed with most of the comments and made the changes in the permit. The letter has been attached to the TSD.

Permit Shield: International Paper asked that MPCA place several permit shield requests into the Title V permit. The Title V permit is a compilation of the requirements that do apply to the facility. MPCA does not place all of the conditions that do not apply, in a permit. The permit shield is for those requirements that do apply to a facility. The shield says that if you comply with the requirements in your permit that are written to ensure compliance with a specific rule, then you are in compliance with the rule. If the requirement does not apply, then it is not in the permit. If we shielded from everything that did not apply to a facility we would have to include the entire Code of Federal Regulations in every permit. Also, there does not seem to be a need to place a shield in the permit for any of the requests as it seems obvious that they do not apply. Take for instance the first example, a shield from subpart Db. If the unit was constructed prior to June 19, 1984 and there have been no modifications to the unit, then the subpart does not apply as per the applicability section of the subpart unless the unit has been modified since that date. If it has not been modified, then there is no need for a shield. If it has been somehow modified since that date, then we would not provide a shield in the permit.

International Paper Sartell requested that the following shields be placed in the permit. After consultation with Attorney General staff, these requests have been placed in the TSD with some MPCA comments.

- Shield from 40 CFR 60 Subpart Db; 40 CFR 61 Subpart E, except 61.52(b), 61.54(e); Minnesota Rules 7011.1201-1285; Minnesota Rules 7011, except 7011.0555 for No. 3 Power Boiler. (none of these requirements are used in the current permit for these units)
- Shield from 40 CFR 60 & 61 for Wickes Boiler & Bros Boiler (These requirements are not cited in the current permit for the Wickes and Bros boilers)
- Shield from 40 CFR 60.42c-60.47c, 60.48c (except 60.48c(a)(1) and 60.48c(g)); 40 CFR 60, Subpart Dc; Minnesota Rule 7011.0555 to 7011.0570 for Package Boiler. (The citations for the Package Boiler in the current permit are 40 CFR 60.48c(a) and 60.48c(g))
- Shield from Minnesota Rule 7011.1105; 40 CFR 60 Subpart Y, except 60.252(c) for Coal Transfer, Coal Crusher, and B&W Coal Bunker. (The above citations are not used for the stated units in the current permit except for 40 CFR 60.252(c))
- Shield from Minnesota Rule 7011.0715 for TMP Screening and Cleaning. (Minn. R. 7011.0715 is not used in the current permit for TMP Screening and Cleaning)

4. Conclusion

Based on the information provided by International Paper, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 00900011-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Greg Kvaal, David Crowell

Attachment: Public Notice Comment Letter