

DRAFT/PROPOSED

AIR EMISSION PERMIT NO. 03500002- 005
Total Facility Oper. Permit - Reissuance

IS ISSUED TO

Wausau Paper Mills LLC

WAUSAU PAPER MILLS LLC
1801 Mill Avenue Northeast
Brainerd, Crow Wing County, MN 56401

The emission units, control equipment and emission stacks at the stationary source authorized in this permit reissuance are as described in the Permit Applications Table.

This permit reissuance supersedes Air Emission Permit No. 03500002-004 and authorizes the Permittee to operate and construct 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 are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the State Implementation Plan (SIP) under 40 CFR § 52.1220 and as such are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: Federal Permit; Part 70/Major for NSR ; True Minor for NSR

Operating Permit Issue Date: <issue date>

Expiration Date: <expiration date > – All Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for John Linc Stine
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

| Permit Type | Application Date | Permit Action |
|---|-------------------------|----------------------|
| Total Facility Operating Permit -Reissuance | 06/11/2008 | 005 |
| Notification | 03/12/2009 | 005 |
| Administrative Amendment | 01/19/2010 | 005 |
| Minor Amendment | 05/05/2010 | 005 |
| Minor Amendment | 01/30/2012 | 005 |

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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. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, 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:

Wausau Paper Mills, LLC is a non-integrated (i.e. no pulp is produced on-site) paper mill in Brainerd, Minnesota. The Facility purchases bleached kraft pulp and recycled pulp to produce fine un-coated printing paper.

The significant emission units include a natural gas fired boiler (EU001), a coal fired boiler (EU002), two natural gas and coal fired boilers (EU003 and EU004), and two paper machines (EU014 and EU015). When operating on natural gas, the emissions from EU003 and EU004 are vented through separate exhaust stacks. However, when burning coal, the emissions from EU002, EU003 and EU004 enter a common flue and pass through a dry electrostatic precipitator (ESP) before exhausting through the common coal combustion stack (SV005). A paper coater was dismantled and removed from the facility during a temporary shutdown in 2002. In addition, used oil and on-site generated petroleum-derived used oil/sorbent/filter media and kerosene soaked sorbents may be burned in the coal-fired boilers. The boilers are sources of criteria pollutants as well as hazardous air pollutants (HAPs). The paper machines are not significant sources of criteria pollutants except for volatile organic compounds (VOCs); they also emit some HAPs.

Minor amendments submitted in May 2010 and January 2012 were to rebuild paper machine #7 (EU015) to allow the Facility to make additional grades of paper and to upgrade an associated repulper. Emissions increases of criteria pollutant associated both projects were tallied and compared to the major modification thresholds. Based on the combined emissions totals a major modification under New Source Review (NSR) is not triggered.

Previously, Wausau Paper Mills, LLC went by the name Wausau Paper Printing & Writing, LLC before a restructuring which became effective January 2010. From January 2007 until January 2010 the Facility went by the name Wausau Paper of Minnesota after it was purchased from Missota Paper Company in 2002. Missota Paper Company purchased the mill from Potlatch Corporation, who operated the mill through May 2002. Missota started to operate the mill in March 2003, following a temporary shutdown.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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 |
|---|---|
| SOURCE-SPECIFIC REQUIREMENTS | hdr |
| Permit Appendices: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in Appendix C: Insignificant Activities and Applicable Requirements. | Minn. R. 7007.0800, subp. 2 |
| Modeling parameters in Appendix B: Modeled Parameters are included for reference only as described elsewhere in Table A. | |
| 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 with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 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. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150; Minn. R. 7009.0020 |
| The Permittee shall comply, and upon written request demonstrate compliance, with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. | 40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2, and 4; Minn. R. 7009.0010-7009.0080 |
| MODELING REQUIREMENTS | hdr |
| The parameters used in SO ₂ modeling for permit 03500002-001 are listed in Appendix B of this permit. The parameters describe the operation of the facility at maximum permitted capacity. The purpose of listing the parameters in the appendix is to provide a benchmark for future changes. | 40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L) & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |
| Modeling Triggers: For any changes that affect any modeled parameter or emission rate, or adds new emission points, the Remodeling Submittal requirement is triggered. This includes changes that do not require a permit amendment as well as changes that require any type of permit amendment. | |
| SO ₂ Remodeling Submittal: The Permittee must submit to the Commissioner for approval changes meeting the above criteria and must wait for a written approval before making such changes. For minor amendments, written approval of the modeling may be given before permit issuance; however, this approval applies only to the modeling and not to any other changes. The information submitted must include, for stack and vent sources, source emission rate, location, height, diameters, exit velocity, exit temperature, discharge direction, use of rain caps or rain hats, and, if applicable, locations and dimensions of nearby buildings. For non-stack/vent sources, this includes the source emission rate, location, size and shape, release height, and, if applicable, any emission rate scalars, and the initial lateral dimensions and initial vertical dimensions and adjacent building heights. | Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |
| SO ₂ Remodeling Submittal, continued: The plume dispersion characteristics due to the revisions of the information must be equivalent to or better than the dispersion characteristics modeled in 2007. The Permittee shall demonstrate this equivalency in the proposal. If the information does not demonstrate equivalent or better dispersion characteristics, or if a conclusion cannot readily be made about the dispersion, the Permittee must submit full remodeling. | Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080, continued |
| The parameters used in NO _x modeling for permit number 03500002-001 are listed in Appendix B of this permit. The parameters describe the operation of the facility at maximum permitted capacity. The purpose of listing the parameters in the appendix is to provide a benchmark for future changes. | Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |
| The parameters used in Total Particulate Matter modeling for permit 03500002-001 are listed in Appendix B of this permit. The parameters describe the operation of the facility at maximum permitted capacity. The purpose of listing the parameters in the appendix is to provide a benchmark for future changes. | Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2** 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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| Modeling at Reissuance: The Permittee shall submit an assessment with the reissuance application (due as stated elsewhere in this permit) that addresses any changes made during the permit term that did not require a permit amendment but that affected any modeled parameter or emission rate (including adding sources beyond those documented in Appendix B) and were not assessed in a later modeling submittal. The information in this submittal shall be the same as listed in the requirement entitled "Remodeling Submittal". | Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000 Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |
| DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NSR | hdr |
| <p>These requirements apply if a reasonable possibility (RP) as defined in 40 CFR Section 52.21(r)(6)(vi) exists that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test (either by itself or as part of the hybrid test at Section 52.21(a)(2)(iv)(f)) and found to not be part of a major modification, may result in a significant emissions increase (SEI). If the ATPA test is not used for the project, or if there is no RP that the proposed project could result in a SEI, these requirements do not apply to that project. The Permittee is only subject to the Preconstruction Documentation requirement for a project where a RP occurs only within the meaning of Section 52.21(r)(6)(vi)(b).</p> <p>Even though a particular modification is not subject to New Source Review (NSR), or where there isn't a RP that a proposed project could result in a SEI, a permit amendment, recordkeeping, or notification may still be required by Minn. R. 7007.1150 - 7007.1500.</p> | Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2 |
| <p>Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following:</p> <ol style="list-style-type: none"> 1. Project description 2. Identification of any emission unit (EU) whose emissions of an NSR pollutant could be affected 3. Pre-change potential emissions of any affected existing EU, and the projected post-change potential emissions of any affected existing or new EU. 4. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the EU could have accommodated during the baseline period, an explanation of why the amounts were excluded, and any creditable contemporaneous increases and decreases that were considered in the determination. <p>The Permittee shall maintain records of this documentation.</p> | Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.1200, subp. 4; Minn. R. 7007.0800, subps. 4 & 5 |
| The Permittee shall monitor the actual emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using the ATPA test, and the potential emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using potential emissions in the hybrid test. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if the hybrid test was used in the analysis) emissions of the regulated pollutant, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit of any unit associated with the project. | Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5 |
| <p>The Permittee must submit a report to the Agency if the annual summed (actual, plus potential if used in hybrid test) emissions differ from the preconstruction projection and exceed the baseline actual emissions by a significant amount as listed at 40 CFR Section 52.21(b)(23). Such report shall be submitted to the Agency within 60 days after the end of the year in which the exceedances occur. The report shall contain:</p> <ol style="list-style-type: none"> a. The name and ID number of the facility, and the name and telephone number of the facility contact person b. The annual emissions (actual, plus potential if any part of the project was analyzed using the hybrid test) for each pollutant for which the preconstruction projection and significant emissions increase are exceeded. c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection. | Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5 |
| OPERATIONAL REQUIREMENTS | hdr |
| The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA. | 40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-3 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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| 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 |
| Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated. | Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J) |
| 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 control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices 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 practices, and the records kept to demonstrate plan implementation. | Minn. R. 7007.0800, subps. 14 and 16(J) |
| 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 |
| 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 |
| 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 |
| 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) |
| The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16. | Minn. R. 7007.0800, subp. 16 |
| PERFORMANCE TESTING | 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 |
| Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A 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 The Notification, Test Plan, and Test Report may be submitted in an alternative format as allowed by Minn. R. 7017.2018. | Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2 |
| Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change. | Minn. R. 7017.2025, subp. 3 |
| MONITORING REQUIREMENTS | hdr |
| Monitoring Equipment Calibration: The Permittee shall calibrate all required monitoring equipment at least once every 12 months (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, B, and/or C, 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) |
| RECORDKEEPING | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

| | |
|---|---|
| Recordkeeping: Retain all records at the stationary source, unless otherwise specified within this permit, 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) |
| 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) |
| If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format. | Minn. R. 7007.1200, subp. 4 |
| 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 |
| 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 discovery, 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 |
| Fugitive Emissions Control Plan: The Permittee shall submit to the Commissioner and implement a fugitive emissions control plan within <60> days of the date of permit issuance. The plan shall identify all fugitive emission sources, primary and contingent control measures, and record keeping. The Permittee shall follow the actions and record keeping specified in the control plan. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive emission control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors. | Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2 |
| 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 - 7007.1500 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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| 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). Performance testing deadlines from the General Provisions of 40 CFR pt. 60 and pt. 63 are examples of deadlines for which the MPCA does not have authority to grant extensions and therefore do not meet the requirements of Minn. R. 7007.1400, subp. 1(H). | Minn. R. 7007.1400, subp. 1(H) |
| Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance, to be submitted on a form approved by the Commissioner. | Minn. R. 7019.3000 - 7019.3100 |
| Emission Fees: due 60 days after receipt of an MPCA bill. | Minn. R. 7002.0005 - 7002.0095 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: GP 001 Existing Boilers

Associated Items: CE 001 Electrostatic Precipitator - High Efficiency
 CE 007 Single Cyclone
 CE 008 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones
 CE 009 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones
 EU 002 Boiler 2
 EU 003 Boiler 3
 EU 004 Boiler 4
 SV 005 ESP Exhaust Stack

| What to do | Why to do it |
|--|-------------------------------------|
| LIMITS AND REQUIREMENTS | hdr |
| The Permittee shall comply with the applicable provisions based on 40 CFR Section 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters by the compliance date. | 40 CFR 63, subp. DDDDD |
| Total Particulate Matter: less than or equal to 0.60 lbs/million Btu heat input . (This limit applies individually to each boiler listed above under Associated Items.) The PTE for each emission unit, using AP-42 emission factors and 95% control efficiency, is 0.12 lb/MMBtu. | Minn. R. 7011.0510, subp. 1 |
| Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. (This limit applies individually to each boiler listed above under Associated Items.) | Minn. R. 7011.0510, subp. 2 |
| Sulfur Dioxide: less than or equal to 4.0 lbs/million Btu heat input when coal is being burned. (This limit applies individually to each boiler listed above under Associated Items.) | Minn. R. 7011.0510, subp. 1 |
| Fuels Allowed: The Permittee shall only combust coal or natural gas in EU 003 or EU 004 (Boiler #3 or #4) and only coal in EU 002 (Boiler #2). In addition, on-site generated petroleum derived used oil/sorbents/filter media and kerosene-soaked sorbents may be burned in the boilers. The used oil shall only be on-specification used oil. The used oil and kerosene-soaked sorbents must be generated on site. | Minn. R. 7007.0800, subp. 2 |
| Sulfur Content of Fuel: less than or equal to 2.5 percent by weight for coal. | Minn. R. 7007.0800, subp. 2 |
| Fuel Usage: less than or equal to 8000 gallons/year using 12-month Rolling Sum total for all boilers combined, of used oil. | Minn. R. 7007.0800, subp. 2 |
| Fuel Usage: less than or equal to 13750 gallons/year using 12-month Rolling Sum total for all boilers combined of oil- or kerosene-soaked sorbent/filter media per year. | Minn. R. 7007.0800, subp. 2 |
| CONTROL EQUIPMENT EMISSION AND OPERATIONAL LIMITS | hdr |
| The Permittee shall operate and maintain the electrostatic precipitator (CE001) at all times that any of the process equipment controlled by the ESP (EU002, EU003, and EU004) are burning coal, used oil, or kerosene-soaked sorbents. The Permittee shall document periods of non-operation of the control equipment. | Minn. R. 7007.0800, subp. 2 and 14 |
| The Permittee shall operate and maintain the control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 95 percent control efficiency | Minn. R. 7007.0800, subp. 2 and 14 |
| The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron: greater than or equal to 95 percent control efficiency | Minn. R. 7007.0800, subp. 2 and 14 |
| The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron: greater than or equal to 95 percent control efficiency | Minn. R. 7007.0800, subps. 2 and 14 |
| Operation and Maintenance of ESP: The Permittee shall operate and maintain the ESP 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 review by MPCA staff. | Minn. R. 7007.0800, subp. 14 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-7 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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|--|--|
| <p>Secondary Voltage: greater than or equal to 155 volts using 3-hour Block Average unless a new minimum secondary voltage is required to be set pursuant to Minn. R. 7017.2025, subp. 3.</p> <p>This limit will be reset based on the permit conditions that follow.</p> | Minn. R. 7007.0800, subps. 2 and 14; Minn. R. 7017.2025, subp. 3 |
| <p>A new total power input is required to be set pursuant to Minn. R. 7017.2025, subp. 3. The new total power input is required to be set; it will be based on the average total power input recorded during the most recent MPCA approved performance test where compliance for Total Particulate Matter emissions was demonstrated. If the three-hour rolling average minimum total power input drops below the minimum limit, this shall be reported as a deviation.</p> | Minn. R. 7007.0800, subps. 2 and 14; Minn. R. 7017.2025, subp. 3 |
| REPORTING/SUBMITTALS | hdr |
| <p>If the monitoring submitted by the owner or operator requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of this part, the owner or operator shall include an implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring. The implementation plan and schedule shall provide for use of the monitoring as expeditiously as practicable after approval of the monitoring in the part 70 permit pursuant to 40 CFR Section 64.6, but in no case shall the schedule for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit.</p> | 40 CFR Section 64.4(e) |
| CONTROL EQUIPMENT MONITORING AND RECORDKEEPING | hdr |
| <p>Monitoring Equipment: The necessary monitoring equipment must be installed, in use, and properly maintained, including maintaining the necessary parts for routine repairs of the monitoring equipment, whenever operation of the monitored control equipment is required.</p> | 40 CFR Section 64.7(b); Minn. R. 7017.0200 |
| <p>Daily ESP Monitoring: The Permittee shall physically check the total power input recording device at least once each operating day to verify that it is working and recording properly.</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| <p>Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording total power input as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored ESP is in operation within 180 days after permit issuance.</p> | Minn. R. 7007.0800, subp. 4(D) |
| <p>Continuous Monitoring: The Permittee shall continuously, or at a minimum once every 15 minutes, monitor and record the total power input of the ESP once the necessary monitoring equipment is installed.</p> | 40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017.0200 |
| <p>Periodic Inspections: At least once per calendar quarter, or more frequently if required by the manufacturer, the Permittee shall inspect the control equipment components that are subject to wear or plugging, for example: bearings, belts, hoses, fans, nozzles, orifices, and ducts. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.</p> | 40 CFR Section 64.3; Minn. R. 7010.0200 |
| <p>Annual Inspections: At least once per calendar year, or more frequently if required by the manufacturer, the Permittee shall inspect the control equipment components not covered by the quarterly inspections. This includes, but is not limited to, components that are not subject to wear or plugging including structural components, housings, and hoods. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.</p> | 40 CFR Section 64.3; Minn. R. 7017.0200 |
| <p>Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:</p> <ul style="list-style-type: none"> - the secondary voltage, averaged over any 3-hour period, is less than 155 volts; or - the total power input, average over any 3-hour period, is outside the range recorded during the most recent MPCA approved performance test where compliance for Total Particulate Matter emissions was demonstrated. - the ESP or any of its components are found during the inspections to need repair. <p>Corrective actions shall return operation to within the permitted 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 ESP. The Permittee shall keep a record of the type and date of any corrective action taken for the ESP.</p> | 40 CFR Section 64.7(d); Minn. R. 7017.0200 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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|---|---|
| Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limit or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing opacity which is considered an excursion, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring changes. | 40 CFR Section 64.7(e); Minn. R. 7017.0200 |
| As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents. | 40 CFR Section 64.9(a)(2); Minn. R. 7017.0200 |
| The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. | 40 CFR Section 64.9(b); Minn. R. 7017.0200 |
| The Permittee shall operate and maintain the ESP 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 |
| The Permittee shall maintain a continuous hard copy readout or computer disk file of the total power input readings for the ESP. Installation of the necessary monitoring and recording equipment is due within 90 days of permit issuance. | Minn. R. 7007.0800, subp. 4 and 5 |
| PERFORMANCE TESTING | hdr |
| Performance Test: due before end of each 60 months starting 02/03/2012, to measure Opacity. The interval between performance tests shall be no greater than 60 months. Testing is to be performed on SV005, stack from ESP. The next performance test is due before 02/03/2017. | Minn. R. 7017.2020, subp. 1 |
| Performance Test: due before end of each 60 months starting 02/03/2012, to measure Total Particulate Matter. The interval between performance tests shall be no greater than 60 months. Testing is to be performed on SV005, stack from ESP. The next performance test is due before 02/03/2017. | Minn. R. 7017.2020, subp. 1 |
| Initial Performance Test: due before end of each calendar 60 months starting 02/03/2012 to measure PM < 10 micron emissions. Testing is to be performed on SV005, stack from ESP. | Minn. R. 7017.2020, subp. 1 |
| Initial Performance Test: due before end of each calendar 60 months starting 02/03/2012 to measure PM < 2.5 micron emissions. Testing is to be performed on SV005, stack from ESP. | Minn. R. 7017.2020, subp. 1 |
| RECORDKEEPING | hdr |
| Coal Fuel Records: The Permittee shall obtain and maintain a certification from the fuel supplier for each coal delivery. The certification shall specify the sulfur content of the coal, in percent by weight. This information shall be maintained on site. | Minn. R. 7007.0800, subp. 5 |
| Recordkeeping. The total amounts of used oil and absorbent material added to the boiler fuel stream shall be calculated and recorded daily. | Minn. R. 7007.0800, subp. 4 and 5 |
| Monthly Recordkeeping - Fuel Usage. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total usage of used oil and of oil/kerosene-soaked sorbent/filter media usage for the previous calendar month using daily usage records. 2) The 12 month rolling sum fuel usage for the previous 12 month period by summing the monthly fuel usage data for the previous 12 months. | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: GP 002 Paper Machines**Associated Items:** EU 014 #8 Paper Machine

EU 015 #7 Paper Machine

| 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 limit applies individually to each emission unit listed in this group (GP002). These types of machines by their nature do not generate particulate emissions and therefore will not emit particulate matter in any significant amount. | Minn. R. 7011.0710, subp. 1(A) |
| Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. This limit applies individually to each emission unit listed in this group (GP002). | Minn. R. 7011.0710, subp. 1(B) |
| Periodic Monitoring: the Permittee shall conduct proper maintenance of the paper machines so as to prevent excessive amounts of particulate matter from being emitted from the associated stack/vents. | Minn. R. 7007.0800, subp. 4 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: GP 003 Fire Water Pumps**Associated Items:** EU 018 Fire Water Pump 1

EU 019 Fire Water Pump 2

| What to do | Why to do it |
|---|--|
| LIMITS | hdr |
| Opacity: less than or equal to 20.0 percent opacity once operating temperatures have been attained. This limit applies individually to each emission unit listed in this group (GP003). | Minn. R. 7011.2300, subp. 1 |
| Sulfur Dioxide: less than or equal to 0.50 lbs/million Btu heat input . This limit applies individually to each emission unit listed in this group (GP003). | Minn. R. 7011.2300, subp. 2 |
| PTE based on equipment capacity and allowed fuels is 0.29 lb/MMBtu. | |
| Sulfur Content of Fuel: less than or equal to 0.40 percent by weight This limit applies individually to each emission unit listed in this group (GP003). | Minn. R. 7007.0800, subp. 2 |
| OPERATIONAL REQUIREMENTS | hdr |
| This emission units in this group are subject separately to the requirements of 40 CFR Part 63 Subpart ZZZZ. The source shall comply with the applicable emission limitations and operating limitations no later than May 3, 2013. | 40 CFR Section 63.6595(a)(1); Minn. R. 7011.8150 |
| Fuel Supplier Certification: obtain and maintain a fuel supplier certification for each shipment of diesel fuel, certifying that the sulfur content does not exceed 0.40% by weight. | Minn. R. 7007.0800, subsps. 4 and 5 |
| Change oil and filter every 500 hours of operation or annually, whichever comes first. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| Inspect air cleaner every 1000 hours of operation or annually, whichever comes first. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| At all times the Permittee shall operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. | 40 CFR Section 63.6605(a) and (b); Minn. R. 7011.8150 |
| Operate and maintain the engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. | 40 CFR Section 63.6625(e)(2); Minn. R. 7011.8150 |
| Install a non-resettable hour meter if one is not already installed by May 3, 2013. | 40 CFR Section 63.6625(f); Minn. R. 7011.8150 |
| The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. | 40 CFR Section 63.6625(h); Minn. R. 7011.8150 |
| The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency specified for changing the oil. The analysis program must at a minimum analyze the following 3 parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is great than 0.5. | 40 CFR Section 63.6625(i); Minn. R. 7011.8150 |

(continued below)

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-11 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

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| (continued from above) If none of the condemning limits are exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. | 40 CFR Section 63.6625(i); Minn. R. 7011.8150 |
| The Permittee shall operate the emergency generator according to the requirements (i)-(iii). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in (i)-(iii), is prohibited. If the Permittee does not operate the engine according to the requirements in (i)-(iii), the engine will not be considered an emergency engine and will need to meet all requirements for non-emergency engines; (i) There is no time limit on the use of the emergency engine in emergency situations. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| (ii) The Permittee may operate the engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| (iii) The Permittee may operate the engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income by supplying power to the electric grid or otherwise supplying power as part of a financial arrangement with another entity; except that the Permittee may operate the engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| (iii), continued from above The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| The Permittee shall comply with the General Provisions in 40 CFR Section 63.1 through 63.15, as applicable. | 40 CFR Section 63.6665 and Table 8 to Subpart ZZZZ of Part 63; 40 CFR Section 63.1 - 63.15; Minn. R. 7011.8150 |
| RECORDKEEPING | hdr |
| The Permittee shall keep records of the maintenance conducted on the engine in order to demonstrate that the Permittee operated and maintained the engine and after-treatment control device (if any) according to the maintenance plan. | 40 CFR Section 63.6655(e)(2); Minn. R. 7011.8150 |
| The Permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, the Permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. | 40 CFR Section 63.6655(f)(1); Minn. R. 7011.8150 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

| | |
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| <p>(a) The Permittee shall keep records in a form suitable and readily available for expeditious review according to 40 CFR Section 63.10(b)(1).</p> <p>(b) As specified in 40 CFR Section 63.10(b)(1), the Permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.</p> <p>(c) The Permittee shall keep each record readily accessible in hard copy or electronic format for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR Section 63.10(b)(1).</p> | <p>40 CFR Section 63.6660; 40 CFR Section 63.10(b)(1); Minn. R. 7011.8150</p> |
|--|---|

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-13**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: EU 001 Boiler 1**Associated Items:** SV 001 Boiler #1 Exhaust

| What to do | Why to do it |
|---|--|
| LIMITS | hdr |
| Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . The PTE of this emission unit is 0.0076 lb/MMBtu. | Minn. R. 7011.0515, subp. 1 |
| Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. | Minn. R. 7011.0515, subp. 2 |
| Fuel Usage: less than or equal to 760 million cubic feet/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. | Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000 |
| RECORDKEEPING | hdr |
| Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain the total quantity of natural gas burned in Boiler #1. This shall be based on a flowmeter. | Title I Condition: To avoid classification as major modification under 40 CFR 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800. subp. 4 and 5 |
| Monthly Recordkeeping -- Natural Gas Usage By the 15th day of each month, the Permittee shall calculate and record the following: 1) The total usage of natural gas in Boiler #1 for the previous calendar month using the daily usage records. 2) The 12 month rolling sum natural gas usage for the previous 12 month period by summing the natural gas usage data for the previous 12 months. | Minn. R. 7007.0800, subp. 4 and 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: EU 007 Trim Cyclone**Associated Items:** CE 010 Single Cyclone

SV 013 Trim Cyclone Stack

| What to do | Why to do it |
|--|---|
| LIMITS | hdr |
| Total Particulate Matter: less than or equal to 0.30 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 percent except for one six-minute period per hour of not more than 60 percent opacity. | Minn. R. 7011.0715, subp. 1(B) |
| CONTROL EQUIPMENT EMISSION AND OPERATIONAL LIMITS | hdr |
| The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.9 percent | Minn. R. 7007.0800, subps. 2 and 14 |
| The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 10 micron: greater than or equal to 99.9 percent | Minn. R. 7007.0800, subps. 2 and 14 |
| The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for PM < 2.5 micron: greater than or equal to 99.9 percent | Minn. R. 7007.0800, subps. 2 and 14 |
| Visible Emissions: The Permittee shall check the fabric filter stack (SV 013) for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation. | Minn. R. 7007.0800, subps. 4 and 5 |
| CONTROL EQUIPMENT MONITORING AND RECORDKEEPING | hdr |
| Recordkeeping of Visible Emissions. The Permittee shall record the time and date of each visible emission inspection and whether or not any visible emissions were observed. | Minn. R. 7007.0800, subps. 4 and 5 |
| The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipment. | Minn. R. 7007.0800, subps. 2 and 14 |
| Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall eliminate visible emissions, 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, subps. 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, subps. 4, 5 and 14 |
| The Permittee shall operate and maintain the fabric filter 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 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-15 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: EU 016 Telephone/Pager Backup Generator**Associated Items:** SV 009 Telephone/Pager Generator Stack

| What to do | Why to do it |
|---|--|
| LIMITS | hdr |
| 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 0.50 lbs/million Btu heat input . PTE based on equipment capacity and allowed fuels is 0.29 lb/MMBtu. | Minn. R. 7011.2300, subp. 2 |
| Fuel type: propane only. | Minn. R. 7005.0100, subp. 35a |
| OPERATIONAL REQUIREMENTS | hdr |
| This emission units in this group are subject separately to the requirements of 40 CFR Part 63 Subpart ZZZZ. The source shall comply with the applicable emission limitations and operating limitations no later than May 3, 2013. | 40 CFR Section 63.6595(a)(1); Minn. R. 7011.8150 |
| Change oil and filter every 500 hours of operation or annually, whichever comes first. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| Inspect spark plugs every 1000 hours of operation or annually, whichever comes first, and replace as necessary. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. | 40 CFR Section 63.6602 and Table 2C to Subpart ZZZZ of Part 63; Minn. R. 7011.8150 |
| At all times the Permittee shall operate and maintain the engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. | 40 CFR Section 63.6605(a) and (b); Minn. R. 7011.8150 |
| Operate and maintain the engine and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. | 40 CFR Section 63.6625(e)(2); Minn. R. 7011.8150 |
| Install a non-resettable hour meter if one is not already installed by October 19, 2013. | 40 CFR Section 63.6625(f); Minn. R. 7011.8150 |
| The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. | 40 CFR Section 63.6625(h); Minn. R. 7011.8150 |
| The Permittee shall operate the emergency generator according to the requirements (i)-(iii). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in (i)-(iii), is prohibited. If the Permittee does not operate the engine according to the requirements in (i)-(iii), the engine will not be considered an emergency engine and will need to meet all requirements for non-emergency engines; (i) There is no time limit on the use of the emergency engine in emergency situations. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| (ii) The Permittee may operate the engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16**

06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

| | |
|---|--|
| (iii) The Permittee may operate the engine up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income by supplying power to the electric grid or otherwise supplying power as part of a financial arrangement with another entity; except that the Permittee may operate the engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| (iii), continued from above The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this paragraph, as long as the power provided by the financial arrangement is limited to emergency power. | 40 CFR Section 63.6640(f)(1); Minn. R. 7011.8150 |
| The Permittee shall comply with the General Provisions in 40 CFR Section 63.1 through 63.15, as applicable. | 40 CFR Section 63.6665 and Table 8 to Subpart ZZZZ of Part 63; 40 CFR Section 63.1 - 63.15; Minn. R. 7011.8150 |
| RECORDKEEPING | hdr |
| The Permittee shall keep records of the maintenance conducted on the engine in order to demonstrate that the Permittee operated and maintained the engine and after-treatment control device (if any) according to the maintenance plan. | 40 CFR Section 63.6655(e)(2); Minn. R. 7011.8150 |
| The Permittee shall keep records of the hours of operation of the engine that are recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for demand response operation, the Permittee shall keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. | 40 CFR Section 63.6655(f)(1); Minn. R. 7011.8150 |
| (a) The Permittee shall maintain records in a form suitable and readily available for expeditious review according to 40 CFR Section 63.10(b)(1). (b) As specified in 40 CFR Section 63.10(b)(1), the Permittee keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. (c) The Permittee shall keep each record readily accessible in hard copy or electronic format for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR Section 63.10(b)(1). | 40 CFR Section 63.6660; 40 CFR Section 63.10(b)(1); Minn. R. 7011.8150 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-17 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

Subject Item: EU 017 Hydroplant Backup Generator**Associated Items:** SV 010 Hydroplant Generator Stack

| What to do | Why to do it |
|---|---|
| NONROAD ENGINES | hdr |
| <p>The Permittee shall keep records for each nonroad engine that will include:</p> <ol style="list-style-type: none">1) Date that the nonroad engine is brought onsite.2) Date that the nonroad engine is taken offsite and/or moved to a different location.3) Identification number.4) Rated capacity of the nonroad engine.5) The model year and date of manufacture (as defined by the applicable nonroad engine rule).6) Which nonroad provision that the nonroad engine is certified under.7) Function of the nonroad engine. <p>While on site, each engine shall be labeled in such way that it can be determined that it is a nonroad engine and not one of the permitted engines covered by this air permit.</p> | Minn. R. 7007.0800, subp. 4 and 5 |
| <p>The Permittee shall not have nonroad engines in one location for more than 12 consecutive months. Any engine, or engines, that replaces an engine at a location and that is intended to perform the same or similar function as the engine it replaced will be included in calculating the consecutive time period.</p> <p>A location is any single site at a building, structure, facility, or installation.</p> | 40 CFR Section 1068.30, "Nonroad engines", (2)(iii) |
| <p>For a nonroad engine that is excluded from any requirements of 40 CFR Part 1068 because it is a stationary engine, the Permittee may not move it or install it in any mobile equipment, except as allowed by the provisions of 40 CFR Part 1068. The Permittee may not circumvent or attempt to circumvent the residence-time requirements of paragraph (2)(iii) of the nonroad engine definition in 40 CFR Section 1068.30.</p> | 40 CFR Section 1068.101(b)(3) |

TABLE B: SUBMITTALS

B-1 06/25/12

Facility Name: Wausau Paper Mills LLC
Permit Number: 03500002 - 005

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

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

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

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.

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

Send any application for a permit or permit amendment to:

Fiscal Services
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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.

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

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

B-2 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

| What to send | When to send | Portion of Facility Affected |
|---------------------------------------|---|------------------------------|
| Application for Permit Reissuance | due 180 days before expiration of Existing Permit | Total Facility |
| Compliance Plan | <p>due 180 days after Permit Issuance. This is the Compliance Assurance Monitoring Plan.</p> <p>If the existing data from unit-specific compliance or performance testing specified in paragraph (c) of 40 CFR Section 64.4 are not available the Permittee:</p> <ul style="list-style-type: none"> - shall submit a test plan and schedule for obtaining such data in accordance with paragraph (e) or 40 CFR Section 64.4; or - may submit indicator ranges that rely on engineering assessments and other data, provided that the owner or operator demonstrates that factors specific to the type of monitoring, control device, or pollutant-specific emissions unit make compliance or performance testing unnecessary to establish indicator ranges at levels that satisfy the criteria in 40 CFR Section 64.3(a). | GP001 |
| Computer Dispersion Modeling Protocol | due 90 days after Permit Issuance for PM < 10 micron. This protocol will describe the proposed modeling methodology and input data, in accordance with 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 |
| Computer Dispersion Modeling Results | due 180 days after Computer Dispersion Modeling Protocol approval. 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 |
| Notification | due 15 days after Equipment Installation of monitoring and recording equipment for total power input of ESP (CE001). The Permittee shall submit the notification to the MPCA. | GP001 |
| Testing Frequency Plan | due 60 days after Initial Performance Test for PM < 10 micron emissions. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the MPCA. | GP001 |
| Testing Frequency Plan | due 60 days after Initial Performance Test for PM < 2.5 micron emissions. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on 12-month, 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the MPCA. | GP001 |

TABLE B: RECURRENT SUBMITTALS**B-3** 06/25/12

Facility Name: Wausau Paper Mills LLC

Permit Number: 03500002 - 005

| 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). The Permittee shall submit this 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 |

APPENDIX B
Modeled Parameters
Facility Name: Wausau Paper Mills LLC
Permit Number: 03500002-005

Modeled Parameters

The table below lists the parameters that were modeled in 2007. The parameters listed in the Appendix reflect the worst-case operating condition for the standard listed.

| Stack Modeled Parameters – Point Sources | | | | | | | | | | | |
|--|-------------------------|------------------------|------------------|------------------|--------------------|-------------------------|---------------------|--------------------|------------------------|-------------------------------------|-------------------------------------|
| Emission Stack/Vent ID SV | Emission Source ID | Description | X Coordinate (m) | Y Coordinate (m) | Release Height (m) | Exhaust Temperature (K) | Exit Velocity (m/s) | Stack Diameter (m) | PM Emission Rate (g/s) | SO ₂ Emission Rate (g/s) | NO ₂ Emission Rate (g/s) |
| SV001 | EU001 | Boiler 1 – Natural Gas | 409,124.30 | 5,136,700.70 | 17.60 | 519.00 | 10.30 | 1.32 | 9.10E-02 | 7.20E-03 | 1.20E+00 |
| SV005 | EU002, EU003, and EU004 | GP001 Boilers - Coal | 409,150.70 | 5,136,651.10 | 24.40 | 466.00 | 18.60 | 2.19 | 4.05E+00 | 6.36E+01 | 1.40E+01 |

| Stack Modeled Parameters – Area Sources | | | | | | | | | | | | | |
|---|--------------------|--------------------------|------------------|------------------|----------------|--------------------|--|---|---|----------------------|----------------------|------------------------------------|---------------------------|
| Emission Stack/Vent ID SV | Emission Source ID | Description | X Coordinate (m) | Y Coordinate (m) | Base Elevation | Release Height (m) | PM Emission Rate (g/s-m ²) | SO ₂ Emission Rate (g/s-m ²) | NO ₂ Emission Rate (g/s-m ²) | Length of X Side (m) | Length of Y Side (m) | Orientation Angle from North (deg) | Initial Vertical Dim. (m) |
| NA | INSIGSO | Insignificant Activities | 409,147.50 | 5,136,531.10 | 368.00 | 0.00 | 1.47E-06 | 0.00E+0 | 6.90E-07 | 162.20 | 226.70 | -11.60 | 0.00 |

APPENDIX C
Insignificant Activities and Applicable Requirements
Facility Name: Wausau Paper Mills LLC
Permit Number: 03500002-005

Insignificant Activities and Applicable Requirements

The table below lists the insignificant activities that are currently at the facility and their associated general applicable requirements.

| Minn. R. 7007.1300, subpart | Rule Description of the Activity | Applicable Requirement |
|-----------------------------|---|---|
| 3(G) | Emissions from a laboratory, as defined in the subpart. <i>Technical Services Lab Hoods.</i> | Minn. R. 7011.0710/0715 |
| 3(H)(3) | Brazing, soldering or welding equipment; <i>Welding shop and an exhaust hood.</i> | Minn. R. 7011.0710/0715 |
| 3(I) | Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of carbon monoxide; 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone; and 3. 1,000 tons/year of CO ₂ e <i>Will Cut Size Sheeters. Emissions are exhausted into the building 100% of the time and will not require air filtering systems to control indoor air emissions.</i> <i>Waste Treatment Plant Space Heating Boiler. Boiler has a maximum heat input capacity of 0.50 MMBtu/hr.</i> <i>Coal Handling/Coal Pile. Wausau Paper has 2 coal piles, one is disturbed daily and the other is disturbed 3 times a week. PM and PM₁₀ emissions are below 1 tpy.</i> | Minn. R. 7011.0715 Minn. R. 7011.0715 and Minn. R. 7011.0610 Minn. R. 7011.0150 |

Insignificant Activities Required to Be Listed for Part 70 sources

| Minn. R. 7007.1300, subpart | Rule Description of the Activity | Applicable Requirement |
|-----------------------------|---|------------------------|
| | Individual emissions units at a stationary source, each of which has: A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide; | |

APPENDIX C
Insignificant Activities and Applicable Requirements
Facility Name: Wausau Paper Mills LLC
Permit Number: 03500002-005

| Minn. R. 7007.1300, subpart | Rule Description of the Activity | Applicable Requirement |
|-----------------------------------|--|-------------------------|
| 4(B) | <p>B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs;</p> <p>C. For hazardous air pollutants, emissions units with:</p> <p>(1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or</p> <p>(2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart; AND</p> <p>D. Potential emissions up to 10,000 tons per year or actual emissions up to 1,000 tons per year of CO₂e.</p> | |
| | <p><i>Waste Treatment Facility. ENSR 1995 Application showed maximum uncontrolled emissions of 0.412 tpy of VOCs based on WATER7 software.</i></p> | Minn. R. 7011.0710/0715 |
| | <p><i>Ash Handling. ENSR 1995 Application shows actual and PTE to be less than 1 tpy.</i></p> | Minn. R. 7011.0105 |
| | <p><i>Color Kitchen Dry Raw Materials Handling. The baghouses are integral to the process; they recover valuable raw material and deposit the raw materials in the user bins. They are necessary in order to pneumatically convey the raw materials.</i></p> | Minn. R. 7011.0710/0715 |
| | <p><i>Color Kitchen Vacuum. The baghouses are integral to the process; they recover valuable raw material and deposit the raw materials in the user bins. They are necessary in order to pneumatically convey the raw materials.</i></p> <p><i>Roll Grinder. Emissions are filtered through an air cleaning system and exhaust into the building 100 percent of the time. PM and PM10 actual emissions are below 1 tpy.</i></p> | Minn. R. 7011.0710/0715 |

APPENDIX C
Insignificant Activities and Applicable Requirements
Facility Name: Wausau Paper Mills LLC
Permit Number: 03500002-005

Conditionally Insignificant Activities

| | Rule Description of the Activity | Applicable Requirement |
|-------------------------------|--|-------------------------------|
| Minn. R. 7008.4110 | Emissions from equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM ₁₀) inside a building, provided that emissions from the equipment are: a). filtered through an air cleaning system; and b). vented inside of the building 100% of the time. <i>Machine Shop Grinding. Emissions are filtered through an air cleaning system and exhausted into the building 100% of the time.</i> | Minn. R. 7011.0710/0715 |