

**AIR EMISSION PERMIT NO. 07100002-008**

**IS ISSUED TO**

Boise White Paper LLC

**BOISE WHITE PAPER LLC - INTERNATIONAL FALLS**

400 2nd Street

International Falls, Koochiching County, MN 56649

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):

<b>Permit Type</b>	<b>Application Date</b>	<b>Permit Action</b>	<b>Issuance Date</b>
Total Facility Operating Permit	04/14/1995	001	09/09/1999
Major Amendment	03/31/1999	003	10/02/2000
Minor Amendment	08/08/2001	004	08/10/2001
Major Amendment	05/2001 & 02/2002	005	11/07/2002
Major Amendment	09/24/2002 & 03/05/2004	006	11/15/2004
Administrative Amendment	10/14/2004	006	11/15/2004
Administrative Amendment	04/18/2005	007	10/13/2005
Major Amendment	05/04/2005	007	10/13/2005
MPCA initiated reopening	02/02/2005	007	10/13/2005
Minor Amendment	08/28/2007	008	See Below

This permit supersedes permit number 07100002-007 and authorizes the Permittee to operate and modify 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.

**Permit Type:** Federal; Pt 70/

Incorporates Existing NSR Conditions

**Final Permit Issuance Date:** 9/9/99

**Expiration:** 9/9/04\*

**Minor Amendment**

**Authorization to Construct Date:** September 4, 2007

**Issuance Date:** May 5, 2008

Title I Conditions do not expire.

\* The Permittee can continue to operate this facility after the expiration date of this permit per the provision under Minn. R. 7007.0450, subp. 3 (Boise's Pt. 70 reissuance app received 3/11/2004).

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Jeff J. Smith, Manager  
Air Quality Permits Section  
Industrial Division

for Brad Moore  
Commissioner  
Minnesota Pollution Control Agency

TDD (for hearing and speech impaired only): 651-282-5332

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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. The permit shield language is not intended to allow you to deviate from permit conditions without obtaining the required prior approvals.

**FACILITY DESCRIPTION:**

Boise Paper LLC operates an integrated Kraft pulp and paper mill in International Falls. The mill manufactures a variety of coated and uncoated fine paper products. The facility consists of a woodyard, chip processing center, pulp mill, bleach plant, chemical recovery system, power plant, wastewater treatment facility, industrial landfill, paper mill, finishing and sheeting, warehouse, and shipping facilities. In 1989/1990 Boise underwent an expansion that included the installation of a new paper machine, a new bleach plant, a new lime kiln, modification of the chemical recovery furnace, and other upgrades.

**PERMIT DESCRIPTION AND HISTORY:**

A Part 70 permit (07100002-001) was issued to Boise in September, 1999. The Part 70 operating permit was a consolidation of existing conditions from the 1989 Prevention of Significant Deterioration Program (PSD) permit and subsequent amendments. The Part 70 permit also authorized a modification that resulted in a significant net emissions increase subject to New Source Review for Boiler No. 2. The modification was for an overfire air project, which is a waste reduction measure that will allow Boise to burn more sludge and bark in the boiler rather than landfilling the sludge and bark.

Boise received a major amendment (07100002-003) in October 2000 for Boise's proposed Efficiency Improvement Project. The project was considered a modification that resulted in a significant net emissions increase under PSD. The purpose of the project was to allow Boise to increase pulp production and generation of black liquor solids so that the facility is less dependent on market pulp. To achieve the higher pulp production and black liquor processing rates, Boise proposed to make several physical modifications.

The Efficiency Improvement Project was evaluated along with the Boiler No. 2 project in an Environmental Assessment Worksheet (EAW) and application for PSD amendment. The project required preparation of a mandatory EAW, because the modifications resulted in increased potential emissions of greater than 100 tons per year for at least a single air pollutant. Applications for modifications subject to PSD require major amendments to the permit. Both the Efficiency Improvement Project and the Boiler No. 2 project were subject to the requirement to obtain a major amendment prior to construction on their own, due to the increase in potential-to-emit.

A minor permit amendment (07100002-004) was issued in August 2001, for installation of a sludge dryer. The dryer allowed Boise to dry the secondary sludge, from the on-site wastewater treatment plant. The sludge is burned in the boiler, rather than being disposed of in the facility's industrial landfill.

A major permit amendment (07100002-005) was issued in November 2002. This permit amendment combined two permit amendment applications. The first permit amendment application was for an increase in Particulate Matter less than 10 um in size limit for the smelt dissolving tank and the lime kiln. Boise submitted a second permit application (January 2002), to increase the Sulfur Dioxide (SO<sub>2</sub>) limit on the brownstock washer and for installation of the No. 3 rotary debarker.

A major permit amendment (07100002-006) was issued in November 2004. This permit amendment included the following: changed carbon monoxide (CO) emission limit for the boilers and incorporated use of a CO continuous emissions monitoring; adjusted CO and SO<sub>2</sub> limits on No. 2 boiler, CO and nitrogen oxides emission rates on recovery furnace, and established Clean Unit Designations; incorporated National Emission Standards for Hazardous Air Pollutant (NESHAP) Subpart MM—NESHAPs for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills; incorporated changes necessary due to performance tests; and incorporated ownership change from Boise Cascade to Boise Paper LLC.

A major permit amendment (07100002-007) was issued in October 2005. The reason for the permit action was a request from Boise White Paper to remove the requirements for the Moonlight Rock Landfill flare from the permit. The landfill is not contiguous with the facility, and neither the landfill or the flare is owned or operated by Boise Paper. The landfill and flare were owned by Boise Cascade. Portions of Boise Cascade (excluding the landfill and flare) were purchased by Boise Paper, LLC. Boise Cascade, now known as OfficeMax, still owns the landfill and flare.

#### **MINOR AMENDMENT DESCRIPTION:**

This permit action (07100002-008) is a minor amendment to the existing Part 70 operating permit. The reason for this permit action is to install an emergency diesel generator (EU 908). Also included in this minor amendment is a NESHAP notification related to an off-machine coater (EU 909) that will incorporate Subpart JJJJ into the permit. Emission Units 303, 305 and 307 were removed from GP340. The boiler plate language of the permit has been updated since the last amendment (-007).

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls  
 Permit Number: 07100002 - 008

**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
FACILITY LIMITS	hdr
Black Liquor Solids (virgin bone dried basis) Production: less than or equal to 41000 tons/month using 12-month Rolling Average	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Recordkeeping: Monthly record and monthly calculation of 12-month rolling average of the black liquor solids production, by the 15th of the following month.	Title I Condition: Recordkeeping for Title I Condition; Minn. R. 7007.0800, subp. 5
Reporting: Annually by January 30th, a report of the previous 12 monthly 12-month rolling average calculations of the black liquor solids production.	Minn. R. 7007.0800, subp. 6
FACILITY 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, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Parameters Used in Modeling: If the Permittee intends to change any of the stack parameters used in the most recently MPCA-approved modeling, the Permittee must submit the revised parameters to the Commissioner and receive written approval before making any changes. The revised parameter information submittal must include but is not limited to: the locations, heights and diameters of the stacks, locations and dimensions of nearby buildings, the velocity and temperatures of the gases emitted, and the emission rates. The plume dispersion characteristics due to the revisions of the information must equal or exceed the dispersion characteristics modeled for this permit, and the Permittee shall demonstrate this 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 remodel.	Title I Condition: 40 CFR Section 52.21(k); Minn. R. 7007.3000; Minn. R. 7009.0020 (criteria pollutants); Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)
Parameters Used in Modeling (continued): If the Permittee proposes to emit any pollutant in addition to those listed in the Boise Cascade Air Toxics Review, dated January 1999, or proposes to increase the emission rate of any pollutant, the Permittee shall first use the ATR as a template for re-evaluating the risk due to the change in emissions. If the proposed change may adversely affect the calculated risk, e.g. the change is an increase in one of the pollutants determined to be a risk driver, (i.e. a pollutant contributing to 95% of the acute, subchronic, or chronic hazard index or 95% of the excess cancer risk), then the Permittee shall submit a report to the MPCA of the proposed change and demonstrate that the recalculated risk for all pollutants emitted from the facility does not exceed the acceptable risk criteria used in the ATR. The Permittee must receive written approval from the MPCA before making any changes.	Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)
Parameters Used in Modeling (continued): For changes that do not involve an increase in an emission rate or that do not seem likely to increase the calculated risk, the Permittee shall keep records of such changes. A report shall be submitted with the annual certification which describes these changes. This report shall include an explanation of why it was determined that notification to the agency was not necessary.  This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)
Parameters Used in Modeling (continued): For changes involving increases in emission rates and that require a minor permit amendment, the proposal must be submitted as soon as practicable, but no less than 60 days before making the change to any parameter.  For changes involving increases in emission rates and that require a permit amendment other than a minor amendment, the proposal must be submitted prior to or with the permit amendment application.  This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)
Plans and Specifications: This is the Ambient TRS Plan. The Ambient TRS Plan has been submitted. This is a state only requirement and is not federally enforceable or enforceable by citizens under the Act.	Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>Ambient TRS Plan: The Ambient TRS Plan shall describe the steps to be taken to ensure that the ambient air TRS target is not exceeded. The Ambient TRS Plan has been submitted. The Plan shall include a description of the location of the TRS monitor and the quality assurance requirements for the monitor and its data. Also to be included are steps that the Permittee will follow if the ambient air TRS target, if the exceedance is attributable to Boise Cascade. This will include the investigative steps and the timelines for reporting the corrective actions that the Permittee will take to meet the ambient air TRS target. Upon approval by the Commissioner, the Plan shall be an enforceable part of the permit. This is a state only requirement and is not federally enforceable or enforceable by citizens under the Act.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Cease Operation: The Permittee may cease operation of the ambient TRS monitor as described in the Ambient TRS Plan. Prior to ceasing operation, the MPCA shall issue a public notice to inform the public that the ambient monitoring will cease. The Permittee shall not cease operation until after the public notice period. The Permittee shall continue to abide by the Ambient TRS Plan, except for those provisions related to operation and maintenance of the TRS monitor, after the monitor has been shut off. This is a state only requirement and is not federally enforceable or enforceable by citizens under the Act.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Operation and Maintenance Plan: The O&amp;M Plan has been submitted.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Operation and Maintenance Plan: The O&amp;M Plan shall include information for the following control equipment: CE220, CE240, CE320, CE322, CE323, CE340, CE341, CE430, and CE431. The Plan has been submitted; a description of what the Plan should include is given below. The Commissioner may require reasonable additions or changes to the O&amp;M Plan prior to granting approval. The Plan may be amended with the Commissioner's written approval. Upon approval, the Plan shall be an enforceable part of the permit and the Permittee shall comply with all parts of the Plan.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>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 &amp; 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.</p>	<p>Minn. R. 7007.0800, subs. 14 and 16(J)</p>
<p>NCG Venting: The Permittee shall control NCGs through thermal oxidation in either the Lime Kiln (primary device), Power Boiler #2 (secondary device) or Power Boiler #1 (tertiary device). When none of these control devices is available, the Permittee may vent NCGs directly to atmosphere. Upon venting NCGs in an uncontrolled manner, the Permittee shall initiate investigation of the cause and take necessary action to re-establish control. If control cannot be re-established within 30 minutes, the Permittee shall initiate shutdown of the NCG-emitting sources in a controlled manner. The NCG-emitting sources, except for the evaporators, shall be shut down within 10 minutes and the remaining sources (the evaporators) shall be shutdown within one hour. The Permittee shall not re-start any of the NCG emitting sources until one of the control systems is operational.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Fugitive Emissions Control Plan: The Permittee has submitted a fugitive emissions control plan for review and approval by the Commissioner. A revision to the plan, dated 2/14/02, was also submitted and approved. The Plan is considered an enforceable part of the permit. The plan shall identify all fugitive emission sources, including paved and unpaved roads, primary and contingent control measures, and record keeping. The Permittee shall follow the actions and record keeping 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 emission control plan, then the permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors.</p>	<p>Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2</p>
<p>Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and record keeping 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.</p>	<p>Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2</p>
<p>List of Insignificant Activities Required to be Listed: Appendix C includes activities and sources at the facility that have been determined to be insignificant activities under Minn. R. 7007.1300. This list does not include every insignificant activity and is subject to change.</p> <p>The Permittee shall maintain proper maintenance of the sources listed in Appendix C, as well as all silos, baghouses, and cyclones, so as to prevent excessive amounts of particulate matter from being emitted from the associated stacks/vents.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.1300</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NEW SOURCE REVIEW</p>	<p>hdr</p>
<p>These requirements apply where there is a reasonable possibility that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test and found to not be part of a major modification, may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project.</p> <p>Even though a particular modification is not subject to New Source Review, a permit amendment, recordkeeping, or notification may still be required under Minn. R. 7007.1150 - 7007.1500.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000</p>
<p>Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following information:</p> <ol style="list-style-type: none"> <li>1. A description of the project</li> <li>2. Identification of the emission unit(s) whose emissions of an NSR pollutant could be affected</li> <li>3. 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 potential emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the unit(s) 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.</li> </ol> <p>The Permittee shall maintain records of this documentation.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>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. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if 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.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>The Permittee must submit a report to the Agency if the annual summed (actual plus potential, if applicable) 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"> <li>a. The name and ID number of the facility, and the name and telephone number of the facility contact person</li> <li>b. The annual emissions (actual plus potential, if any part of the project was analyzed using potential emissions) for each pollutant for which the preconstruction projection and significant emissions increase are exceeded.</li> <li>c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection.</li> </ol>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 &amp; 5</p>
<p>MACT REQUIREMENTS - SUBPART S</p>	<p>hdr</p>
<p>MACT Requirements: This facility is subject to all pertinent requirements of the MACT, 40 CFR pt. 63, subp. S (National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry). This permit contains many of the applicable requirements from 40 CFR part 63, Subparts A and S. Some of the requirements may be paraphrased in this permit. If there is a conflict between a permit term and the regulation, the regulation shall take precedence.</p>	<p>40 CFR pt. 63, subp. S</p>
<p>Compliance Dates for Enclosures and Closed-Vent Systems: Compliance for the requirements in 40 CFR 63.450 and described below (i.e. the standards for enclosures and closed-vent systems) shall be achieved by the date for the applicable system. The compliance date for the NCG system, pulping condensates and bleach plant is April 16, 2001; the compliance date for the brownstock washer system is April 17, 2006.</p>	<p>40 CFR Section 63.440</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>Standards for Enclosures and Closed-vent Systems:                  Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by procedures specified in 40 CFR Section 63.457(e). Each enclosure or hood opening closed during the initial performance test specified in 40 CFR Section 63.457(a) shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.</p> <p>Each component of the closed-vent system used to comply with 40 CFR Section 63.443(c) and 63.445(b) that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 ppm by volume above background, as measured by the procedures in 40 CFR Section 63.457(d).</p>	<p>40 CFR Section 63.450(b)</p>
<p>Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations in 40 CFR Section 63.443 or 63.445 shall comply with either of the following requirements:</p> <ol style="list-style-type: none"> <li>1) On each bypass line, the owner or operator shall install, calibrate, maintain and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line; or</li> <li>2) For bypass line valves that are not computer controlled, the owner or operator shall maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal.</li> </ol>	<p>40 CFR Section 63.450(b) CONTINUED</p>
<p>Monitoring Requirements for Enclosure and Closed-vent Systems:</p> <ol style="list-style-type: none"> <li>1) For each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR Section 63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.</li> <li>2) Each closed-vent system required by 40 CFR Section 63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures and connections to covers for visible evidence of defects.</li> <li>3) For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR Section 63.450(c) measured initially and annually by the procedures in 40 CFR Section 63.457(d).</li> <li>4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Section 63.457(e).</li> </ol>	<p>40 CFR Section 63.453(k)</p>
<ol style="list-style-type: none"> <li>5) The valve or closure mechanism specified in 40 CFR Section 63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.</li> <li>6) If an inspection required by paragraphs 1 through 5 of this section identified visible defects in ductwork, piping or enclosure or connections to covers required by 40 CFR Section 63.450, or if an instrument reading of 500 ppm by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:                         <ol style="list-style-type: none"> <li>(i) A first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified.</li> <li>(ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.</li> </ol> </li> </ol>	<p>40 CFR Section 63.453(k) CONTINUED</p>
<p>Site-Specific Inspection Plan: The Permittee shall prepare and maintain a site-specific inspection plan for each applicable enclosure opening, closed-vent system, and closed collection system. The Plan shall include a drawing or schematic of the components of applicable affected equipment. The Permittee shall record the information described in 40 CFR Section 63.454(b) for each inspection.</p>	<p>40 CFR Section 63.454(b)</p>
<p><b>MACT REQUIREMENTS - GENERAL PROVISIONS</b></p>	<p>hdr</p>
<p>At all times the Permittee shall operate and maintain the emission unit subject to the MACT standard and its associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.</p>	<p>40 CFR Section 63.6(e)(1)(i)</p>
<p>Malfunions: Malfunions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.</p>	<p>40 CFR Section 63.6(e)(1)(ii)</p>



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>The Permittee shall prepare and implement a Startup, Shutdown, and Malfunction Plan (SSMP) for each of the emission units subject to Maximum Control Technology Standards by the applicable compliance date. The SSMP is a federally enforceable part of the permit and shall be prepared in accordance with 40 CFR Section 63.6(e)(3) and shall include requirements specified in 40 CFR Section 63.6(e)(3). The SSMP must be located at the plant site and must be kept updated. When the SSMP is updated, the Permittee must keep all previous versions of the SSMP for a period of 5 years. The Permittee must submit the SSMP when required.</p>	<p>40 CFR Section 63.6(e)(3)(i); 40 CFR Section 63.6(e)(3)(v)</p>
<p>During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the source (including associated air pollution control equipment) in accordance with the procedures specified in the Startup, Shutdown, and Malfunction Plan.</p>	<p>40 CFR Section 63.6(e)(3)(ii); 40 CFR Section 63.6(e)(3)(iii)</p>
<p>The Permittee shall maintain files of all information required by this part recorded in a form suitable and readily available for expeditious inspection and review. The information maintained in the files shall, at a minimum, contain the information described in 40 CFR Section 63.10(b)(2). The files should be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Of data required to be retained for five years, only the most recent two years of information must be kept on site.</p>	<p>40 CFR Section 63.10(b)(1)</p>
<p>Startup, shutdown, and malfunction reports shall be submitted only if there is an occurrence of startup, shutdown, and malfunction during the reporting period and shall be delivered or postmarked by the 30th day following the end of each calendar half year.</p>	<p>40 CFR Section 63.10(d)(5)(i)</p>
<p>If the Permittee deviates from the startup, shutdown, and malfunction plan (SSMP) during a startup, shutdown, or malfunction, the Permittee shall record the actions taken for that event and report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event. The report must contain name, title, and signature of a responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.</p>	<p>40 CFR Section 63.6(e)(3)(iv); 40 CFR Section 63.10(d)(5)(ii)</p>
<p>Prior to construction or reconstruction of an "affected source" under the promulgated MACT standards, the Permittee must apply for and obtain an air emission permit.</p>	<p>40 CFR Section 63.5(b)(3)</p>
<p><b>GENERAL TOTAL FACILITY REQUIREMENTS</b></p>	<p>hdr</p>
<p>Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)</p>
<p>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.</p>	<p>Minn. R. 7019.1000, subp. 3</p>
<p>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.</p>	
<p>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.</p>	<p>Minn. R. 7019.1000, subp. 2</p>
<p>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.</p>	
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

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
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
General Performance Test (PT) Requirements:  Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.  PT Notifications (written): due 30 days before each Performance Test PT Plan: due 30 days before each Performance Test PT Pre-test Meeting: due 7 days before each Performance Test PT Report: due 45 days after each Performance Test PT Report - Microfiche or CD-ROM: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2035, subp. 1-2
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. Operating rate limits will be based on a 12 hour block average basis provided that all emission results were less than or equal to 80% of the applicable limits. Otherwise, an averaging period of 6 hours applies.	Minn. R. 7017.2025
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
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
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
Emissions Inventory Report: due April 1 of each calendar year following permit issuance. 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
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
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)
Record keeping: 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)
Record keeping: 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 strip-chart 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)
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)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-7

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

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 federally enforceable.	Minn. R. 7030.0010 - 7030.0080
COMS and CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, zero and span adjustments, and periods when the monitored source is not in operation, all COMS and CEMS shall be in continuous operation.	Minn. R. 7007.0800, subp. 4; Minn. R. 7007.0800, subp. 2
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Risk Management Plan: The Permittee was required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR pt. 68. The Permittee resubmitted its RMP and EPA indicated it was complete on 6/0/04, EPA Facility ID# 1000 0002 3271. The rule requires each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, to design and implement an accidental release prevention program. A full update and resubmission of the RMP is required at least once every 5 years. The 5-year anniversary date is reset whenever the facility fully updates and resubmits their RMP. Submit RMPs to the Risk Management Plan Reporting Center, P.O. Box 1515, Lanham-Seabrook, Maryland 20703-1515. RMP information may be obtained at <a href="http://www.epa.gov/swercepp">http://www.epa.gov/swercepp</a> or by calling 1-800-424-9346.	40 CFR Section 68

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls  
 Permit Number: 07100002 - 008

**Subject Item: GP 340 NCG Incineration and Venting**

- Associated Items:** CE 342 Other
- EU 110 Turpentine Decanter #1
  - EU 115 Turpentine Decanter #2
  - EU 120 Turpentine Condenser dig. 1-4
  - EU 125 Turpentine Condenser dig. 5-7
  - EU 130 Pre-evaporator Hotwell
  - EU 135 Stripper Feed Tank
  - EU 140 Blow Heat Secondary Condenser
  - EU 309 Evaporator Hotwell

What to do	Why to do it
MACT REQUIREMENTS	hdr
HAP Control: Gases from the LVHC system shall be combusted in the lime kiln, or boiler #2 or #1 as backup.	40 CFR Section 63.443(a)(1)(i); 40 CFR Section 63.443(d)(4)
Enclosures and Venting: All equipment listed in this group shall be enclosed and vented into a closed-vent system meeting the requirements specified in 40 CFR Section 63.450 and as described in the total facility section.	40 CFR Section 63.443(c)
OTHER REQUIREMENTS	hdr
TRS Control: Gases from the NCG sources (batch digester system (blow heat recovery), relief condensers and decant system, foul condensate stripper feed tank, and the multiple-effect evaporator) shall be combusted in the lime kiln which shall be equipped with a scrubber. The TRS limit from the lime kiln shall be 8 ppmvd corrected to 10% oxygen. The heavy black liquor tanks are not subject to the venting conditions associated with the other NCG sources.	40 CFR Section 60.283(a)(1)(i); Minn. R. 7011.2450
TRS Control - Backup and Emergency: During shutdowns and malfunctions of the lime kiln, non-condensable gases from the NCG sources (batch digester system, relief condensers and decant system, foul condensate stripper feed tank, and the multiple-effect evaporator system) shall be routed to Boiler #2 (EU430) for oxidation. During emergency situations when neither the lime kiln or Boiler #2 are available, the NCG shall be oxidized in Boiler #1 (EU420). NCG oxidation in Boilers #1 and #2, in aggregate, shall be limited to allow emissions of SO2 to no more than 115 tons per year from Boilers #1 and #2 together, on a 12-month rolling sum basis. The heavy black liquor tanks are not subject to the venting conditions associated with the other NCG sources.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
NCG Venting: NCG venting (venting directly to the atmosphere, rather than being oxidized in the lime kiln or Boilers #1 or #2) shall be limited to not more than 30 hours per year on a 12-month rolling sum basis. NCG venting shall also follow procedure described under the Total Facility subject item.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Recordkeeping: Monthly record of hours during which NCG's are oxidized in Boiler #1 or #2 and of venting hours and monthly calculation of SO2 emissions from Boiler #1 and #2 and of 12-month rolling sums, by the 15th of the following month.  Boiler #1 SO2 emissions shall be calculated using emission factors and operating data, including hours of NCG oxidation. Boiler #2 SO2 emissions shall be calculated using SO2 CEMS data and boiler operating data, including hours of NCG oxidation.	Title I Condition: Recordkeeping associated with Title I Condition; Minn. R. 7007.0800, subp. 5
Reporting: Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of NCG oxidized in Boiler #1 and #2 and of NCG venting.	Minn. R. 7007.0800, subp. 6

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls  
 Permit Number: 07100002 - 008

**Subject Item: GP 420 Boilers & Recovery furnace - NOx cap**

- Associated Items:** EU 320 Recovery Furnace  
 EU 322 Smelt Dissolving Tank  
 EU 340 Lime Kiln  
 EU 420 Boiler #1  
 EU 430 Boiler #2  
 EU 440 Boiler #3  
 EU 450 Boiler #8  
 EU 460 Boiler #9

What to do	Why to do it
Nitrogen Oxides: less than or equal to 3.67 tons/day from combustion sources (Boilers #1, #2, #3, #8, #9 and Recovery Furnace).	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Calculate: Calculate NOx emissions daily from combustion sources. The NOx emissions from EU320, EU420, EU430, EU440, EU450, and EU460 (recovery furnace, boilers #1, #2, #3, #8, and #9) shall be summed together and compared to the NOx limit for the combustion sources (3.67 tons/day). The NOx emissions from each emission unit are to be determined from the CEMS for that emission unit. Any exceedances shall be reported with the CEMS EERs.	Title I Condition: Calculations associated with Title I Condition; Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 4.18 tons/day , calculated on a semi-annual basis. This limit is the total NOx cap for the facility, and includes the combustion sources (boilers #1, #2, #3, #8, #9, and the recovery furnace) as well as the lime kiln and smelt dissolving tank.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Calculate: NOx emissions from the smelt dissolving tank (EU 322) and the lime kiln (EU 340) shall be calculated by multiplying the emission factor determined from performance tests and the applicable production rate. The NOx emissions shall be added to the emissions determined from the CEMS and shall then be compared to the total NOx emission limit for GP 420. The total NOx emissions shall be calculated on a semi-annual basis. Any exceedances shall be reported with the CEMS EERs.	Title I Condition: Calculations associated with Title I Condition; Minn. R. 7007.3000

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-10

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** GP 421 Kraft Pulping Process Condensates**Associated Items:** EU 145 Foul Condensate Stripper

EU 179 14% Black Liquor Tank

EU 301 18% Liquor Tank

What to do	Why to do it
Condensate Treatment: Regulated condensates shall be hardpiped to the UNOX closed biological treatment system. The UNOX treatment system shall be operated in a manner that provides at least 92% bio-treatment of HAPs to meet the requirements of 40 CFR Section 63.446(e)(3).	40 CFR Section 63.446
Condensate Closed Collection System: Regulated condensates shall be collected and conveyed in a closed collection system that is designed and operated to meet the requirements of 40 CFR Section 63.446(c) and 40 CFR Section 63.962(a)(2).	40 CFR Section 63.446; 40 CFR Section 63.962(a)(2)
Condensate Monitoring Requirements: The Permittee shall install, calibrate, certify, operate, and maintain, according to 40 CFR Section 63.453, equipment to demonstrate sufficient condensate collection and treatment in order to satisfy the requirements of 40 CFR Section 63.446(c)(2) and 40 CFR Section 63.446(e)(3). Mixed Liquor Volatile Suspended Solids (MLVSS) shall be monitored to demonstrate continuous compliance with the minimum bio-treatment requirement. A condensate collection and treatment performance test shall be conducted as required in requirement below.	40 CFR Section 63.453
Performance Test: due before 12/31/2004. This shall be the condensate collection and treatment performance test. This test was completed on 11/15/2004.	40 CFR Section 63.453

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-11

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** GP 422 Paper Machines**Associated Items:** EU 505 No. 2 Paper Machine

EU 520 No. 3 Paper Machine

EU 540 No. 1 Paper Machine

<b>What to do</b>	<b>Why to do it</b>
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 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Periodic Monitoring: the Permittee shall perform 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**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** GP 423 HVLC NCG Incineration and Venting

**Associated Items:** CE 320 Electrostatic Precipitator - High Efficiency

EU 173 Brown Stock Washing

EU 175 Foam System (Foam Tank, Foam Chest)

EU 303 55% Black Liquor Solids Tank

EU 305 62% Black Liquor Solids Tank

EU 307 72% Black Liquor Solids Tank

EU 320 Recovery Furnace

EU 323 Precipitator Salt Cake Mix Tank

EU 324 Hopper Flush Tank

EU 905 HL Swing Tank

What to do	Why to do it
Emission units EU 303, EU 305, EU 307, EU 323, EU 324, and EU 905 are to be voluntarily controlled with this group, but are not subject to Subpart M.	hdr
Compliance Date for MACT Requirements: Compliance with the requirements from the MACT standard for the HVLC system shall be achieved no later than April 15, 2006.	40 CFR Section 63.443; 40 CFR Section 63.447



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** SV 173 Brown Stock Washer

**Associated Items:** EU 173 Brown Stock Washing

EU 174 Brown Stock Decker

What to do	Why to do it
EMISSION LIMITS	hdr
Sulfur Dioxide: less than or equal to 0.02 lbs/ton air dried tons unbleached pulp.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.20 lbs/ton air dried tons unbleached pulp, measured as carbon excluding methane.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Sulfur - Total Reduced: less than or equal to 0.12 lbs/ton air dried tons unbleached pulp, measured as H2S.	Title I Condition: 40 CFR Section 52.21(j); (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
TRS Control: The brown stock washing system is exempt from the TRS requirements in 40 CFR pt.60, subp. BB since it was demonstrated that incinerating the exhaust gases from the brown stock washing system is economically infeasible. This was done in the permitting for the 1989 New Source Review permit.	40 CFR Section 60.283(a)(1)(iv); Minn. R. 7011.2450
Compliance Date for MACT Requirements: Compliance with the requirements from the MACT standard for the brown stock washer system shall be achieved by April 17, 2006.	40 CFR 63.440(d)
Pulping System Emissions Control: The emissions from the pulping system shall meet the requirements specified in 40 CFR Section 63.443(a)(1)(ii) through (iv), or as specified in Section 63.447 Clean Condensate Alternative.	40 CFR Section 63.446
Monitoring Requirements: The Permittee shall install, calibrate, certify, operate, and maintain according to manufacturer's specifications, a continuous monitoring system (CMS) according to 40 CFR Section 63.453.	40 CFR Section 63.453
Enclosures and Venting: All equipment listed in this group shall be enclosed and vented into a closed-vent system meeting the requirements specified in 40 CFR Section 63.450 and as described in the total facility section.	40 CFR Section 63.443(c)
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 36 months starting 09/09/1999 to measure Volatile Organic Compound and Total Reduced Sulfur emissions. The tests shall be conducted at an interval not to exceed 36 months between test dates. These tests are not required if the Brownstock Washer system has been incorporated into the closed collection system as required by the MACT standards. The Brownstock Washer (EU 173) system has been collected since April 2006. The performance test for the Brownstock Decker (EU 174) was conducted 6/6/06.	Title I Condition: Testing associated with Title I emission limit; Minn. R. 7017.2020, subp. 1
Performance Test: due before 07/01/2007 to measure Sulfur Dioxide emissions. This test is not required if the Brownstock Washer system has been incorporated into the closed collection system as required by the MACT standards. The Brownstock Washer (EU 173) system has been collected since April 2006. The performance test for the Brownstock Decker (EU 174) was conducted 6/6/06.	Title I Condition: Testing associated with Title I emission limit; Minn. R. 7017.2020, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: SV 220 ClO2 Generator**

- Associated Items:** EU 220 ClO2 Generator  
 EU 221 Dump Tank  
 EU 222 ClO2 Storage Tank A  
 EU 223 ClO2 Storage Tank B  
 EU 224 Sewer Vent (L8)  
 EU 225 ClO2 Tower Seal Tank  
 EU 226 Saltcake Mix Tank  
 EU 227 Barometric Condenser  
 EU 228 Saltcake Filter  
 EU 229 Saltcake Hydroclone  
 EU 230 Anti-Siphon Vent

What to do	Why to do it
EMISSION LIMITS	hdr
Chlorine: less than or equal to 0.17 lbs/hour . This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Limit established due to risk assessment performed as part of PSD permitting for 1989 permit)
Chlorine Dioxide: less than or equal to 2.2 lbs/hour . This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Limit established due to risk assessment performed as part of PSD permitting for 1989 permit)
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Control Equipment Monitoring: Observe and record, once per operating shift, the pressure drop of the gas stream for CE220.	Minn. R. 7007.0800, subp. 14
Control Equipment Monitoring: Continuously monitor the scrubbing liquid supply flow rate for CE220.	Minn. R. 7007.0800, subp. 14
Pressure Drop: greater than or equal to 3.2 inches of water column or as determined during the most recent performance test (this is pressure drop of the gas stream).	Minn. R. 7007.0800, subp. 14
Liquid Flow Rate: greater than or equal to 93 gallons/minute or as determined during the most recent performance test (this is scrubbing liquid supply flow rate).	Minn. R. 7007.0800, subp. 14
Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility O&M Plan and perform the necessary corrective action(s) as soon as possible to get the parameters back into the correct range. The Permittee shall keep a record of the type and date of all corrective actions taken.	Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 5
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 08/08/2000 to measure Chlorine and Chlorine Dioxide emissions. This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. The next test is due August 8, 2005, then every 60 months thereafter.	Minn. R. 7017.2020, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: SV 240 Bleach plant**

- Associated Items:** EU 240 D/C Tower  
 EU 241 D Tower  
 EU 242 D/C Blend Chest  
 EU 243 D-Mixer Sample Pot.  
 EU 244 D/C Filt. Tank  
 EU 245 D Filt. Tank  
 EU 246 Eo Filt. Tank  
 EU 247 Acid Sewer Vent  
 EU 248 Chlorine Blowdown Tank

What to do	Why to do it
EMISSION LIMITS	hdr
HAPs - Total: less than or equal to 10 parts per million or less than or equal to 0.02 lb per ton of oven-dried pulp or reduce the Total Chlorinated HAP mass entering the control device by 99% or more by weight. In this limit, Total HAPs refers to Total Chlorinated HAPs (not including chloroform).	40 CFR Section 63.445(c)
Chlorine: less than or equal to 0.41 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Limit established due to risk assessment performed as part of PSD permitting for 1989 permit)
Chlorine Dioxide: less than or equal to 1.2 lbs/hour . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7007.0800, subp. 2 (Limit established due to risk assessment performed as part of PSD permitting for 1989 permit)
OPERATIONAL LIMITS	hdr
The Permittee shall comply with paragraph (d)(1) or (d)(2) of 40 CFR Section 63.445 (summarized below) to reduce chloroform air emissions to the atmosphere.  (1) Comply with the applicable effluent limitation guidelines and standards specified in 40 CFR part 430;  (2) Use no hypochlorite or chlorine for bleaching in the bleaching system or line.	40 CFR Section 63.445(d)
Enclosures and Venting: Equipment listed at this stack, and which are associated with equipment where bleaching chemicals are added, shall be enclosed and vented into a closed-vent system meeting the requirements specified in 40 CFR Section 63.450 and as described in the total facility section.	40 CFR Section 63.443(c)
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
CMS for Scrubber: The Permittee shall install, calibrate, certify, operate, and maintain a continuous monitory system (CMS) to measure the following parameters for the gas scrubber: (1) The pH or the oxidation/reduction potential of the gas scrubber effluent; (2) The scrubber fan operating condition; and (3) The gas scrubber liquid influent flow rate.  An option to the CMS requirement above, is to install, calibrate, certify, operate, and maintain a CMS to measure the chlorine outlet concentration of each gas scrubber used to comply with the bleaching system outlet concentration requirement specified in 40 CFR Section 63.445(c)(2).	40 CFR Section 63.453(a), (c), (d)
Scrubber Parameter Values: To establish or reestablish the value for each operating parameter required to be monitored under 40 CFR Section 63.453, the Permittee shall use the procedures described in 40 CFR Section 63.453(n).	40 CFR Section 63.453(n)
Control Equipment Operation: The Permittee shall operate the gas scrubber in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under paragraphs (a) through (n) of 40 CFR Section 63.453, as established by performance test, and as described in 40 CFR Section 63.453(o). Operation of the control device below minimum operating parameter values or above maximum operating parameter values established under 40 CFR pt. 63, subp. S shall constitute a violation of the applicable emission standard of 40 CFR pt. 63, subp. S and shall be reported as a period of excess emissions.	40 CFR Section 63.453(o)
Control Equipment Monitoring: Observe and record, once per operating shift, the pressure drop of the gas stream for CE240.	Minn. R. 7007.0800, subp. 14

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-16

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

Control Equipment Monitoring: Continuously monitor the scrubbing liquid supply flow rate for CE240.	Minn. R. 7007.0800, subp. 14
Pressure Drop: greater than or equal to 3.6 inches of water column or as determined during the most recent performance test (this is pressure drop of the gas stream).	Minn. R. 7007.0800, subp. 14
Liquid Flow Rate: greater than or equal to 121 gallons/minute or as determined during the most recent performance test (this is scrubbing liquid supply flow rate).	Minn. R. 7007.0800, subp. 14
Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility O&M Plan and perform the necessary corrective action(s) as soon as possible to get the parameters back into the correct range. The Permittee shall keep a record of the type and date of all corrective actions taken.	Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 5
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 08/08/2000 to measure Chlorine and Chlorine Dioxide emissions. This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. The next test is due August 8, 2005, then every 60 months thereafter.	40 CFR Section 63.457(a); Minn. R. 7017.2020, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** SV 322 Smelt Dissolving Tank

**Associated Items:** EU 322 Smelt Dissolving Tank

EU 323 Precipitator Salt Cake Mix Tank

EU 324 Hopper Flush Tank

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 5.7 lbs/hour . (This limit is based on an emission rate limit of 0.12 lb/ton BLS (dry) and thus is more stringent than the NSPS limit (40 CFR Section 60.282(a)(2)) and MACT limit (40 CFR Section 63.862(a)(1)(i)(B)) of 0.2 lb/ton BLS for a smelt dissolving tank).	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 5.7 lbs/hour	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7007.0800, subp. 2
Nitrogen Oxides: less than or equal to 0.033 lbs/ton of black liquor solids produced.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Sulfur Dioxide: less than or equal to 4.3 lbs/hour (this is equivalent to 0.090 lb/ton BLS).	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.090 lbs/ton BLS (black liquor solids), measured as C excluding methane. (this is equivalent to 4.3 lb/hr)	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Sulfur - Total Reduced: less than or equal to 0.033 lbs/ton (lb/ton of BLS (black liquor solids)), measured as H2S. The BACT limit is the same as the NSPS limit.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); 40 CFR Section 60.283(a)(4); Minn. R. 7007.3000; Minn. R. 7011.2450
OPERATIONAL LIMITS	hdr
<p>Process Throughput: less than or equal to 1589.3 tons/day of black liquor solids, calculated on a twelve-hour block average, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, based on the most recent MPCA approved performance test where compliance was demonstrated.</p> <p>The twelve-hour block average shall be calculated by dividing the total weight by the total operating time in each twelve-hour block. Down time of 15 or more minutes is not to be included as operating time.</p> <p>The Production limit located at the facility level also applies at all times.</p>	Minn. R. 7017.2025, subp. 3
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment. The monitoring device is to be certified by the manufacturer to be accurate to within a gage pressure of +/- 2 inches water gage pressure. The monitoring device shall be operational upon startup of the control equipment. MACT Subp. MM requires monitoring of the scrubbing liquid flow rate to be certified within +/- percent of the design rate. Alternative monitoring parameters may be used with prior approval from the EPA Administrator.	40 CFR Section 60.284(b)(2)(i); 40 CFR Section 63.864(e); Minn. R. 7011.2450
Install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the scrubbing liquid supply pressure to the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within +/- 15 percent of design scrubbing liquid supply pressure. The pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device shall be operational upon startup of the control equipment.	40 CFR Section 60.284(b)(2)(ii); 40 CFR Section 63.864(e); Minn. R. 7011.2450
Record once per shift, measurements obtained from the monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment and from the monitoring device for the continuous measurement of the scrubbing liquid supply pressure to the control equipment.	40 CFR Section 60.284(c)(4); Minn. R. 7011.2450
<p>Pressure Drop: greater than or equal to 10 inches of water column using 3-hour Block Average or as determined during the most recent performance test.</p> <p>Three-hour block average is the average scrubber pressure drop in each three-hour block. Downtime of 15 or more minutes is not to be included as operating time.</p>	Minn. R. 7017.2025, subp. 3

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>Liquid Flow Rate: greater than or equal to 81 gallons/minute using 3-hour Block Average or as determined during the most recent performance test.</p> <p>To determine the three-hour block average, divide the total gallons by the total operating time in each three-hour block. Downtime of 15 or more minutes is not to be included as operating time.</p>	<p>Minn. R. 7017.2025, subp. 3</p>
<p>Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility O&amp;M Plan and perform the necessary corrective action(s) as soon as possible to get the parameters back into the correct range. The Permittee shall keep a record of the type and date of all corrective actions taken.</p>	<p>40 CFR Sections 63.864(k) and 63.867(c); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 5</p>
<p><b>TESTING REQUIREMENTS</b></p>	<p>hdr</p>
<p>Initial Performance Test: due before 09/09/2004 to measure Particulate Matter (Method 5 front-half) emissions. This is the initial compliance test for the MACT Subpart MM standard. Tests shall be conducted in accordance with the requirements of 40 CFR Section 63.7 and 63.865. This initial performance test has been completed.</p>	<p>40 CFR Section 63.7(a)(2); 40 CFR Section 63.865(b)(1)</p>
<p>Performance Test: due before end of each 36 months starting 10/27/2004 to measure Particulate Matter &lt; 10 micron and Total Reduced Sulfur (TRS) emissions. The next test is due October 27, 2006, then every 36 months thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before end of each 36 months starting 08/08/2000 to measure Total Particulate Matter, Opacity, Volatile Organic Compound and Nitrogen Oxides emissions. The Nitrogen Oxides test data will also be used to determine an emission factor which shall be used in calculating the total NOx emissions for comparison to the total NOx cap (GP 420). The next test is due November 4, 2006, then every 36 months (3 years) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before end of each 60 months starting 11/04/2006 to measure Sulfur Dioxide emissions. The next test is due November 4, 2006, then every 60 months (5 years) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>
<p><b>RECORD KEEPING</b></p>	<p>hdr</p>
<p>NOx Emissions Calculation: The NOx emissions shall be calculated on a semi-annual basis. The NOx emission factor, obtained from performance test, shall be multiplied by the production rate of the black liquid solids production. The NOx emissions shall be calculated and converted to a tons/day basis for determining the total NOx emissions from the facility and comparison to the NOx cap (GP 420).</p>	<p>Minn. R. 7007.0800, subp. 6</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-19

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: SV 903 Combined SV220 and SV240 (ClO2 Generator & Bleach Plant)**

<b>What to do</b>	<b>Why to do it</b>
Additional stack to combine SV 220 (ClO2 generator) and SV 240 (Bleach plant) has been installed to match stack parameters as modeled for Air Toxics Review. The stack must be maintained. This is a state only requirement and is not federally enforceable or enforceable by citizens under the Act.	Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 320 Recovery Furnace**

**Associated Items:** CE 320 Electrostatic Precipitator - High Efficiency

GP 420 Boilers & Recovery furnace - NOx cap

GP 423 HVLC NCG Incineration and Venting

MR 320 Recovery Furnace

MR 321 Recovery Furnace

MR 322 Recovery Furnace

MR 323 Recovery Furnace

MR 324 Recovery Furnace

MR 325 Recovery Furnace

SV 320

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 30.7 lbs/hour . This is more stringent than the NSPS subp. BB and MACT MM limits of 0.044 gr/dscf @ 8% O2, which also apply.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); 40 CFR Section 63.864(c)(2)(i); 40 CFR Section 60.282(a)(i); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 22.9 lbs/hour	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average . This is more stringent than 35% opacity limit of NSPS subp. BB and MACT subp. MM, which also applies.	40 CFR Section 63.864(c)(2)(i); 40 CFR Section 60.282(a)(ii); Minn. R. 7007.0800, subp. 2
Sulfur Dioxide: less than or equal to 200 tons/year using 12-month Rolling Sum , calculated using emission factor derived from performance test and using monthly production throughput.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); 40 CFR Section 63.864(c)(2)(i); Minn. R. 7007.3000
Sulfur Dioxide: less than or equal to 106.2 lbs/hour using 3-hour Average	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 102 lbs/hour using 30-day Rolling Average . This is equivalent to 80 ppm on a dry basis, corrected to 8% oxygen.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 500 lbs/hour using 24-hour Rolling Average . This is equivalent to 600 ppm on a dry basis, corrected to 8% oxygen.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 31.3 lbs/hour using 3-hour Average measured as C, excluding methane. (this is based on emission rate of 0.6 lb/salt cake free, bone dry tons of black liquor solids).	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Sulfur - Total Reduced: less than or equal to 5 parts per million on a dry basis, corrected to 8% oxygen, using a 12-hour average. The BACT limit is the same as the NSPS limit.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); 40 CFR Section 60.283(a)(2); Minn. R. 7007.3000; Minn. R. 7011.2450
OPERATIONAL LIMITS	hdr
Fuel burned: limited to natural gas. HVLC NCGs and black liquor solids (BLS) (virgin bone dried basis) are also oxidized in the recovery furnace.	Title I Condition: 40 CFR Section 52.21
<p>Process Throughput: less than or equal to 1450 tons/day of virgin black liquor solids (virgin bone dried basis), calculated on a twelve-hour block average, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, based on the most recent MPCA approved performance test where compliance was demonstrated.</p> <p>The twelve-hour block average shall be calculated by dividing the total weight by the total operating time in each twelve-hour block. Down time of 15 or more minutes is not to be included as operating time.</p> <p>The Production limit located at the facility level also applies at all times.</p>	Minn. R. 7017.2025, subp. 3
Recordkeeping: records of the black liquor solids firing rates in units of tons/day shall be maintained.	40 CFR Section 63.867(c)(1)
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
ESP Monitoring: The COMS for this emission unit shall be used to assess proper operation of this ESP.	40 CFR Section 63.865(c)(1); Minn. R. 7007.0800, subp. 2



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

TESTING REQUIREMENTS	hdr
Initial Performance Test: due before 09/09/2004 (180 days after March 13, 2004) to measure PM emissions (using EPA Method 5, front-half only) for MACT Subp. MM. Tests shall be conducted in accordance with the requirements of 40 CFR Section 63.7 and 63.865. This test was completed October 2003.	40 CFR Section 63.865(b)(1); Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 36 months starting 08/08/2000 to measure Total Particulate Matter, Particulate Matter < 10 microns, and Sulfur Dioxide emissions. The next test is due November 4, 2006, then every 36 months (3 years) thereafter. The SO2 performance test will also be used to determine emission factor to be used in calculation of SO2 emissions for comparison to 200 tons/year limit.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2000 to measure Volatile Organic Compound emissions. The next test is due November 4, 2008, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limit; Minn. R. 7017.2020, subp. 1
COMS REQUIREMENTS	hdr
Emissions Monitoring: The Permittee shall use a COMS to measure Opacity emissions from EU320.	Title I Condition: Monitoring associated with Title I emission limits; Minn. R. 7017.1006; 40 CFR Section 63.865(c)(1)
COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the calibration drift (CD) exceeds twice the specification of PS-1 of 40 CFR 60, Appendix B.	Minn. R. 7017.1211, subp. 2; 40 CFR 60.13(d)(2); 40 CFR Section 63.865(c)(1)
COMS Calibration Error Audit: due before end of each calendar quarter starting 03/14/2004. Filter values used shall be compliant with Minn. R. 7017.1210, subp. 3.	Minn. R. 7017.1210, subp. 3; 40 CFR Section 63.865(c)(1)
Recordkeeping: The owner or operator must retain records of all COMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR Section 63.865(c)(1)
QA Plan Required: Develop and implement a written quality assurance plan which covers each COMS. The plan shall be on site and available for inspection. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1.	Minn. R. 7017.1210; 40 CFR Section 63.865(c)(1)
COMS Monitoring Data: The Permittee shall reduce the COMS data to six-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the six-minute averaging period.	Minn. R. 7017.1200, subp. 1, 2, & 3; 40 CFR Section 63.865(c)(1)
COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all COMS shall be in continuous operation. A COMS must not be bypassed except in emergencies where failure to bypass the COMS would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1; 40 CFR Section 63.865(c)(1)
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording, Nitrogen Oxide emissions, Carbon Monoxide emissions, Total Reduced Sulfur emissions, and either Oxygen or Carbon Dioxide.	Title I Condition: Monitoring associated with Title I emission limit; 40 CFR Section 60.45(a); Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	Minn. R. 7017.1170, subp. 3
CEMS Cylinder Gas Audit (CGA): due before end of each calendar year starting 09/09/1999 for TRS. If a RATA is performed during the calendar year, a CGA is not required.	Minn. R. 7017.1170, subp. 1(A) and (B)
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting 09/09/1999 TRS	Minn. R. 7017.1170, subp. 1(A) and (B)
CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 09/09/1999. Conduct cylinder gas audit (CGA) at least 3 months apart but not greater than 8 months apart. If a RATA is performed during the calendar half-year a CGA is not required. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 09/09/1999. If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months from the date of the last test. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7017.1170, subp. 5
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-22

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 340 Lime Kiln

**Associated Items:** CE 340 Centrifugal Collector - Medium Efficiency

CE 341 Wet Scrubber-High Efficiency w/o Lime

GP 420 Boilers & Recovery furnace - NOx cap

MR 327 O2 monitor

MR 340 Lime Kiln

MR 341 Lime Kiln

MR 903 TRS Monitor

SV 340

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 10.6 lbs/hour	Title I Condition: 40 CFR Section 52.21 (netting and modeling); Minn. R. 7007.3000
Total Particulate Matter: less than or equal to 0.064 grains/dry standard cubic foot @10% oxygen. This is more stringent than the NSPS subp. BB of 0.067 gr/dscf @10% oxygen, which also applies.	40 CFR Section 63.862(a)(i)(C); Minn. R. 7011.7700(B)
Particulate Matter < 10 micron: less than or equal to 10.6 lbs/hour	Title I Condition: 40 CFR Section 52.21 (netting and modeling); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7011.0610, subp. 1(A)(2)
Sulfur Dioxide: less than or equal to 13.5 lbs/hour	Title I Condition: 40 CFR Section 52.21 (netting and modeling); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 34.9 lbs/hour using 3-hour Average	Title I Condition: 40 CFR Section 52.21 (BACT limit and modeling); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 23.7 lbs/hour	Title I Condition: 40 CFR Section 52.21 (BACT limit and modeling); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 11.4 lbs/hour , measured as C excluding methane.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Sulfur - Total Reduced: less than or equal to 8 parts per million using 12-hour Average (calculated on a dry basis and corrected to 10% oxygen). The BACT limit is the same as the NSPS limit.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); 40 CFR Section 60.283(a)(5); Minn. R. 7007.3000; Minn. R. 7011.2450
OPERATIONAL LIMITS	hdr
Fuel Usage: Limited to natural gas. Non-condensable gas (NCG) is also oxidized in the lime kiln.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Production: less than or equal to 207.9 tons/day of lime, calculated on a twelve-hour block average, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, based on the most recent MPCA approved performance test where compliance was demonstrated.  The twelve-hour block average shall be calculated by dividing the total weight by the total operating time in each twelve-hour block. Down time of 15 or more minutes is not to be included as operating time.	Minn. R. 7017.2025, subp. 3
Recordkeeping: records of the CaO production rate in units of tons/day shall be maintained.	40 CFR Section 63.867(c)(2)
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
Install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment. The monitoring device is to be certified by the manufacturer to be accurate to within a gage pressure of +/- 2 inches water gage pressure. The monitoring device shall be operational upon startup of the control equipment.	40 CFR Section 63.864(e); 40 CFR Section 60.284(b)(2)(i); Minn. R. 7011.2450

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<p>Install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the scrubbing liquid supply pressure to the control equipment. The monitoring device is to be certified by the manufacturer to be accurate within +/- 15 percent of design scrubbing liquid supply pressure. The pressure sensor or tap is to be located close to the scrubber liquid discharge point. The monitoring device shall be operational upon startup of the control equipment. MACT Subp. MM requires monitoring of the scrubbing liquid flow rate to be certified within +/- percent of the design rate. Alternative monitoring parameters may be used with prior approval from the EPA Administrator.</p>	<p>40 CFR Section 63.864(e); 40 CFR Section 60.284(b)(2)(ii); Minn. R. 7011.2450</p>
<p>Install, calibrate, maintain, and operate a continuous parameter monitoring system (CPMS) that can be used to determine and record the scrubber liquid supply pressure and the scrubbing liquid flow rate at least once every successive 15-minute period using the procedures in 63.8(c), as well as the procedures in paragraphs (e)(10)(i) and (ii).</p>	<p>40 CFR Section 63.864(e)(10) &amp; (13)</p>
<p>Record once every 15 minutes as equally spaced intervals, or as an arithmetic or integrated three-hour block average, measurements obtained from the monitoring device for the continuous measurement of the pressure loss of the gas stream through the control equipment and from the monitoring device for the continuous measurement of the scrubbing liquid supply pressure to the control equipment.</p>	<p>40 CFR Section 63.864(a)(2); 40 CFR Section 60.284(c)(4); Minn. R. 7011.2450</p>
<p>Pressure at nozzle: greater than or equal to 308 psi or as determined during the most recent performance test, using a 3-hour Block Average. This pressure is the scrubber liquid supply pressure.</p>	<p>Minn. R. 7017.2025, subp. 3; EPA letter dated 12/8/04 allowing this under 40 CFR Section 63.864(j)(2) and (3) (ADI Control Number M050014)</p>
<p>Determine the average liquid supply pressure in each three-hour block. Downtime of 15 or more minutes is not to be included as averaging time.</p>	
<p>Liquid Flow Rate: greater than or equal to 425 gallons/minute using 3-hour Block Average or as determined during the most recent performance test.</p>	<p>Minn. R. 7017.2025, subp. 3; EPA letter dated 12/8/04 allowing this under 40 CFR Section 63.864(j)(2) and (3) (ADI Control Number M050014)</p>
<p>To determine the three-hour block average, divide the total gallons by total operating time in each three-hour block. Downtime of 15 or more minutes is not to be included as operating time.</p>	
<p>Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility O&amp;M Plan and the SSMP and perform the necessary corrective action(s) as soon as possible to get the parameters back into the correct range. The Permittee shall keep a record of the type and date of all corrective actions taken.</p>	<p>40 CFR Section 63.864(k); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 5</p>
<p><b>TESTING REQUIREMENTS</b></p>	<p>hdr</p>
<p>Performance Test: due before end of each year starting 08/08/2001 to measure Total Particulate Matter and Particulate Matter &lt;10 micron emissions. The next test is due October 1, 2005, then every year (12 months) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>
<p>Initial Performance Test: due before 09/09/2004 (180 days after March 13, 2004) to measure PM emissions (using EPA Method 5, front-half only) for MACT Subp. MM. Tests shall be conducted in accordance with the requirements of 40 CFR Section 63.7 and 63.865. This test was completed on 08/31/2004.</p>	<p>40 CFR Section 63.865(b)(1); Minn. R. 7017.2020, subp. 1</p>
<p>Performance Test: due before end of each 36 months starting 08/08/2000 to measure Nitrogen Oxides, Sulfur Dioxide, Volatile Organic Compounds and Carbon Monoxide emissions. The next test is due July 1, 2006, then every 36 months (3 years) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>
<p><b>CEMS REQUIREMENTS</b></p>	<p>hdr</p>
<p>The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording the Total Reduced Sulfur emissions, and either Oxygen or Carbon Dioxide.</p>	<p>Title I Condition: Monitoring associated with Title I emission limits; 40 CFR Section 60.45(a); Minn. R. 7017.1006</p>
<p>CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.</p>	<p>40 CFR 60.13(d)(1); Minn. R. 7017.1170, subp. 3</p>
<p>CEMS Cylinder Gas Audit (CGA): due before end of each calendar year starting 09/09/1999. Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required.</p>	<p>Minn. R. 7017.1170, subp. 1(A) and (B)</p>
<p>CEMS Relative Accuracy Test Audit (RATA): due before end of each 60 months starting 11/01/2005. (PER007 requires new RATA to be done by 11/1/05 and every 60 months thereafter). Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.</p>	<p>Minn. R. 7017.1170, subp. 1(A) and (B)</p>
<p>QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.</p>	<p>Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3</p>

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-25

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR 60.7(f)
RECORD KEEPING	hdr
Recordkeeping: Monthly record, by the 15th of the following month, the amount of lime produced.	Minn. R. 7007.0800, subp. 6
NOx Emissions Calculation: The NOx emissions shall be calculated on a semi-annual basis. The NOx emission factor, obtained from performance test, shall be multiplied by the production rate of the black liquid solids production (virgin bone dried basis). The NOx emissions shall be calculated and converted to a tons/day basis for determining the total NOx emissions from the facility and comparison to the NOx cap (GP 420).	Minn. R. 7007.0800, subp. 6

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 420 Boiler #1

**Associated Items:** CE 420 Other

GP 420 Boilers & Recovery furnace - NOx cap

MR 420 Boiler 1

MR 421 Boiler 1

SV 420 Boiler #1

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7011.0510, subp. 1
Particulate Matter < 10 micron: less than or equal to 0.6 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (modeling and netting); 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.	Minn. R. 7011.0510, subp. 2
Nitrogen Oxides: less than or equal to 0.2 lbs/million Btu heat input using 30-day Rolling Average	Title I Condition: 40 CFR Section 52.21(modeling); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
Fuel burned: limited to natural gas. Exhaust from the sludge dryer (EU 903) may also vent to boiler #1. Non-condensable gas (NCG) is also oxidized in boiler #1. The amount of NCG burned in boiler #1 is limited under GP 340. The amount of NCG burned in boiler #1 is limited under GP 340.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
The Permittee shall comply with all applicable portions of 40 CFR Section 63, Subpart DDDDD, by September 13, 2007.	40 CFR Section 63, Subpart DDDDD
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording Nitrogen Oxide emissions.	Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	Minn. R. 7017.1170, subp. 3
CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 09/09/1999 . Conduct cylinder gas audit (CGA) at least 3 months apart but not greater than 8 months apart. If a RATA is performed during the calendar half-year a CGA is not required. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 09/09/1999 . If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months from the date of the last test. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7017.1170, subp. 5
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2
CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 430 Boiler #2**

**Associated Items:** CE 430 Centrifugal Collector - Medium Efficiency

CE 431 Electrostatic Precipitator - High Efficiency

GP 420 Boilers & Recovery furnace - NOx cap

MR 430 Boiler 2

MR 431 Boiler 2

MR 432 Boiler 2

MR 433 Boiler 2

SV 430

SV 431

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 13.0 lbs/hour	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 11.7 lbs/hour	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7007.0800, subp. 2
Sulfur Dioxide: less than or equal to 39.5 lbs/hour 6-hour rolling average. This limit does not apply when NCG is being oxidized in the #2 boiler.	Title I Condition: 40 CFR Section 52.21 (BACT and modeling limit); Minn. R. 7007.3000
Sulfur Dioxide: less than or equal to 9.4 lbs/hour using 12-month Rolling Average . This limit does not apply when NCG is being oxidized in the #2 boiler.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 100.2 lbs/hour using 30-day Rolling Average	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 800 lbs/hour using 1-Hour Average	Title I Condition: 40 CFR Section 52.21 (BACT and modeling limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 200 lbs/hour using 12-month Rolling Average	Title I Condition: 40 CFR Section 52.21 (BACT and modeling limit); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 40.2 lbs/hour measured as C excluding methane.	Title I Condition: 40 CFR Section 52.21 (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
Fuel Burned: Fuels to be burned are limited to bark, wood refuse, wastewater treatment sludge, paper, and natural gas. Non-condensable gas (NCG) is also oxidized in boiler #2. The amount of NCG burned in boiler #2 is limited under GP 340.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Fuel Usage: less than or equal to 27010 tons/month using 12-month Rolling Average . The fuel usage limit is for combined total of bark, wood refuse, paper, and sludge and shall be expressed in units of green tons per month.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Fuel Usage: less than or equal to 5193 tons/month using 12-month Rolling Average (SLUDGE USAGE LIMIT).	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Fuel Usage: less than or equal to 36.9 tons/hour of total bark/wood refuse/sludge, calculated on a six-hour block average. This limit is in effect unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, based on the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7017.2025, subp. 3
The six-hour block average shall be calculated by dividing the total weight by the total operating time in each six-hour block. Down time of 15 or more minutes is not to be included as operating time.	
The Permittee shall comply with all applicable portions of 40 CFR Section 63, Subpart DDDDD, by September 13, 2007.	40 CFR Section 63 Subpart DDDDD
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
ESP Monitoring: The COMS for this emission unit shall be used to assess proper operation of this ESP.	Minn. R. 7007.0800, subp. 2
TESTING REQUIREMENTS	hdr

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

Performance Test: due before end of each 60 months starting 08/08/2000 to measure Total Particulate Matter, Particulate Matter <10 micron, and Volatile Organic Compounds emissions. The next test is due August 8, 2005, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
COMS REQUIREMENTS	hdr
Emissions Monitoring: The Permittee shall use a COMS to measure Opacity emissions from EU430.	Title I Condition: Monitoring associated with Title I emission limits; Minn. R. 7017.1006
COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the calibration drift (CD) exceeds twice the specification of PS-1 of 40 CFR 60, Appendix B.	Minn. R. 7017.1211, subp. 2; 40 CFR 60.13(d)(2)
COMS Calibration Error Audit: due before end of each calendar half-year starting 09/09/1999 . Conduct audits at least 3 months apart but no greater than 8 months apart. Filter values used shall be compliant with Minn. R. 7017.1210, subp. 3.	Minn. R. 7017.1210, subp. 3
Recordkeeping: The owner or operator must retain records of all COMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130
QA Plan Required: Develop and implement a written quality assurance plan which covers each COMS. The plan shall be on site and available for inspection. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1.	Minn. R. 7017.1210
COMS Monitoring Data: The Permittee shall reduce the COMS data to six-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the six-minute averaging period.	Minn. R. 7017.1200, subp. 1, 2, & 3
COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all COMS shall be in continuous operation. A COMS must not be bypassed except in emergencies where failure to bypass the COMS would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording Nitrogen Oxide, Sulfur Dioxide, and Carbon Monoxide emissions.	Title I Condition: Monitoring associated with Title I emission limits; Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	Minn. R. 7017.1170, subp. 3
CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 09/09/1999 . Conduct cylinder gas audit (CGA) at least 3 months apart but not greater than 8 months apart. If a RATA is performed during the calendar half-year a CGA is not required. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 09/09/1999 . If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months from the date of the last test. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7017.1170, subp. 5
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2
CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 440 Boiler #3**

**Associated Items:** CE 440 Other

GP 420 Boilers & Recovery furnace - NOx cap

MR 440 Boiler 3

MR 441 Boiler 3

SV 440

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7011.0510
Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	Title I Condition: 40 CFR Section 52.21 (BACT limit; modeling); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 33.6 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.0090 lbs/million Btu heat input , measured as C excluding methane (this is equivalent to 3.4 lb/hr).	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
Fuel Burned: Fuels to be burned are limited to natural gas.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Annual Capacity Factor: Record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor for natural gas each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.	Title I Condition: 40 CFR Section 52.21; 40 CFR Section 60.49b(d); Minn. R. 7007.3000
The Permittee shall comply with all applicable portions of 40 CFR Section 63, Subpart DDDDD, by September 13, 2007.	40 CFR Section 63 Subpart DDDDD
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2000 to measure Volatile Organic Compounds and Carbon Monoxide emissions. The next test is due August 8, 2005, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording the Nitrogen Oxide emissions, and either Oxygen or Carbon Dioxide.	Title I Condition: Monitoring associated with Title I emission limits; NSPS Subp. Db; 40 CFR Section 60.45(a); Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	40 CFR 60.13(d)(1); Minn. R. 7017.1170, subp. 3; 40 CFR pt. 60, App. F, section 4.1;
CEMS Cylinder Gas Audit (CGA): due before end of each calendar quarter starting 09/09/1999 but in no more than three calendar quarters per calendar year. The RATA shall be conducted during the calendar quarter in which a CGA is not performed.	40 CFR pt. 60, App. F, section 5.1.2; Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 09/09/1999 . Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	40 CFR pt. 60, App. F, section 5.1.1; Minn. R. 7017.1170, subp. 5
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-30

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR 60.7(f)
Records of Startup, Shutdown, or Malfunction: Any owner or operator subject to the provisions of this part 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 60.7(b)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 450 Boiler #8**

**Associated Items:** CE 450 Other  
 GP 420 Boilers & Recovery furnace - NOx cap  
 MR 450 Boiler 8  
 MR 451 Boiler 8  
 SV 450

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7011.0510
Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input using 3-hour Average	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 33.6 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.0090 lbs/million Btu heat input measured as C excluding methane (this is equivalent to 3.4 lb/hr).	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
Fuel Burned: Fuels to be burned are limited to natural gas.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
<p>Fuel Usage: less than or equal to 192.0 million Btu's/hour of natural gas heat input, calculated on a twelve-hour block average, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3, based on the most recent MPCA approved performance test where compliance was demonstrated.</p> <p>The twelve-hour block average shall be calculated by dividing the total weight by the total operating time in each twelve-hour block. Down time of 15 or more minutes is not to be included as operating time.</p>	Minn. R. 7017.2025, subp. 3
Annual Capacity Factor: Record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor for natural gas each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.	Title I Condition: 40 CFR Section 52.21; 40 CFR Section 60.49b(d); Minn. R. 7007.3000
The Permittee shall comply with all applicable portions of 40 CFR Section 63, Subpart DDDDD, by September 13, 2007.	40 CFR Section 63 Subpart DDDDD
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2000 to measure Volatile Organic Compounds and Carbon Monoxide emissions. The next test is due August 8, 2005, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording Nitrogen Oxide emissions.	Title I Condition: Monitoring associated with Title I emission limits; 40 CFR Section 60.45(a); Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	40 CFR 60.13(d)(1); Minn. R. 7017.1170, subp. 3
CEMS Cylinder Gas Audit (CGA): due before end of each calendar year starting 09/09/1999. Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required.	Minn. R. 7017.1170, subp. 1(A) and (B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-32

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting 09/09/1999 . Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7017.1170, subp. 1(A) and (B)
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3
CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR 60.7(f)
Records of Startup, Shutdown, or Malfunction: Any owner or operator subject to the provisions of this part 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 60.7(b)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 460 Boiler #9

**Associated Items:** CE 460 Other  
 GP 420 Boilers & Recovery furnace - NOx cap  
 MR 460 Boiler 9  
 MR 461 Boiler 9  
 SV 460

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average	Minn. R. 7011.0510
Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input using 3-hour Average	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Carbon Monoxide: less than or equal to 33.6 lbs/hour	Title I Condition: 40 CFR Section 52.21(k) (modeling); Minn. R. 7007.3000
Volatile Organic Compounds: less than or equal to 0.0090 lbs/million Btu heat input measured as C excluding methane (this is equivalent to 3.4 lb/hr).	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
Fuel Burned: Fuels to be burned are limited to natural gas.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Annual Capacity Factor: Record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor for natural gas each calendar quarter. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.	Title I Condition: 40 CFR Section 52.21; 40 CFR Section 60.49b(d); Minn. R. 7007.3000
The Permittee shall comply with all applicable portions of 40 CFR Section 63, Subpart DDDDD, by September 13, 2007.	40 CFR Section 63 Subpart DDDDD
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2000 to measure Volatile Organic Compounds and Carbon Monoxide emissions. The next test is due August 8, 2005, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
CEMS REQUIREMENTS	hdr
The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording Nitrogen Oxide emissions.	Title I Condition: Monitoring associated with Title I emission limits; 40 CFR Section 60.45(a); Minn. R. 7017.1006
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS.	40 CFR 60.13(d)(1); Minn. R. 7017.1170, subp. 3
CEMS Cylinder Gas Audit (CGA): due before end of each calendar year starting 09/09/1999 . Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required.	Minn. R. 7017.1170, subp. 1(A) and (B)
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting 09/09/1999 . Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7017.1170, subp. 1(A) and (B)
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection. The plan shall contain all of the information required by 40 CFR 60, App. F, section 3.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-34

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR 60.7(f)
Records of Startup, Shutdown, or Malfunction: Any owner or operator subject to the provisions of this part 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 60.7(b)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 530 No. 4 Paper Machine**

- Associated Items:** SV 511  
 SV 512  
 SV 513  
 SV 514  
 SV 515  
 SV 516  
 SV 517  
 SV 518  
 SV 519  
 SV 524  
 SV 525  
 SV 530  
 SV 531  
 SV 532  
 SV 533  
 SV 534  
 SV 535  
 SV 536  
 SV 537

<b>What to do</b>	<b>Why to do it</b>
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. 7011.0610, subp. 1(A)(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. 7011.0610, subp. 1(A)(2)
Fuel Burned: Fuels to be burned are limited to natural gas.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Periodic Monitoring: the Permittee shall perform proper maintenance of the paper machine 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-36

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 602 Wastewater Treatment Plant Cooling Tower****Associated Items: SV 602**

<b>What to do</b>	<b>Why to do it</b>
Wastewater Process Throughput: less than or equal to 1700E6 gallons/year using 12-month Rolling Sum	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Recordkeeping: Monthly wastewater processed rate and monthly calculation of 12-month rolling sum, by the 15th of the following month.	Title I Condition: Recordkeeping associated with Title I limit; Minn. R. 7007.0800, subp. 5
Reporting: Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of wastewater throughput.	Minn. R. 7007.0800, subp. 6



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-37

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 902 Paint Spray Booth**Associated Items:** CE 902 Paper Filter (Not Accordian) - Use if paint filter not spec

SV 902

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 percent opacity using 6-minute Average	Minn. R. 7011.0715, subp. 1(B)
Operating Hours: less than or equal to 1044 hours/year using 12-month Rolling Sum	Title I Condition: Limit taken to avoid classification as major modification under 40 CFR Section 52.21; Minn. R. 7007.3000
Spray Booth Operation: The particulate filter for the emission unit shall be securely in place whenever paint spraying occurs. The filter shall be maintained and replaced according to manufacturer's specifications.	Title I Condition: To limit emissions to avoid classification as major modification under 40 CFR Section 52.21; Minn. R. 7007.3000
Recordkeeping: Monthly record of operating hours and monthly calculation of 12-month rolling sum, by the 15th of the following month.	Title I Condition: Recordkeeping for Title I Condition; Minn. R. 7007.0800, subp. 5
Reporting: Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of spray booth operation.	Minn. R. 7007.0800, subp. 6

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 903 Sludge Dryer

**Associated Items:** CE 904 Other

CE 905 Venturi Scrubber

CE 906 Spray Tower

SV 430

SV 431

SV 904 Sludge Dryer

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 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Operation and Maintenance Plan: Within 30 days of initial startup of EU 903 (Sludge Dryer), submit an update to the O&M Plan. The update shall include the parameter ranges for the parameters identified below for CE 905 and CE 906. The plan shall also identify correction action procedures to be followed to return the control equipment to within specified range(s); corrective action procedures to be followed in the event of a malfunction, breakdown or exceedance of operating ranges; a description of inspection procedures to be followed; and records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 2
Control Equipment Monitoring: Observe and record once per operating day, the liquid flow rate and pressure drop for CE 905 and CE 906.	Minn. R. 7007.0800, subp. 14

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: EU 908 Emergency Diesel Generator**

**Associated Items:** SV 908 Diesel Generator

What to do	Why to do it
40 CFR pt. 63, subp. ZZZZ applies to this generator. In accordance with Section 63.6590(c) the generator must meet the requirements of this part by meeting the requirements of 40 CFR part 60, subp. IIII. Because the model year of the engine is 2004, there are no applicable requirements from Subp. IIII for this emission unit.	40 CFR pt. 63, subp. ZZZZ Minn. R. 7011.8150
EMISSION LIMITS	hdr
Opacity: less than or equal to 20 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 . The potential to emit from the unit is 0.051 lb/MMBtu due to equipment design and allowable fuels.	Minn. R. 7011.2300, subp. 2
OPERATIONAL REQUIREMENTS	hdr
Fuel type: No. 2 fuel oil only.	Minn. R. 7005.0100, subp. 35a
Hours of Operation: less than or equal to 500 hours per year based on a 12-month rolling sum. The U.S. EPA memorandum entitled "Calculating Potential to Emit (PTE) for Emergency Generators", dated September 6, 1995, limits operation to 500 hours per year.	Minn. R. 7007.0800, subp. 4 & 5
RECORDKEEPING REQUIREMENTS	hdr
Recordkeeping - Hours of Operation: The Permittee shall maintain documentation of hours of operation for EU 908.	Minn. R. 7007.0800, subps. 4 & 5
Reporting: Annually by January 30th the report of the previous 12 monthly 12-month rolling sum calculations on the emergency diesel generator.	Minn. R. 7007.0800, subp. 6
Fuel Supplier Documentation: The Permittee shall obtain and maintain fuel supplier documentation for each shipment of No. 2 fuel oil, documenting that the sulfur content does not exceed 0.5% by weight. Records shall be maintained for 5 years.	Minn. R. 7007.0800, subps. 4 & 5

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-40

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item:** EU 909 Off-Machine Coater

**Associated Items:** SV 907 EU 909 OMC Exhaust Vent

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
HAPs - Organic: less than or equal to 20 percent of the mass of coating solids applied for each calendar month for the web coating line (as defined in 40 CFR Section 63.3310).	40 CFR Section 63.3320(b)(3); Minn. R. 7011.7385
MONITORING AND RECORDKEEPING	hdr
The Permittee shall maintain the following records on a monthly basis: 1) Records specified in 40 CFR Section 63.10(b)(2) of all measurements need to demonstrate compliance, including: volatile matter and coating solids content data for the purpose of demonstrating compliance in accordance with the requirements of 40 CFR Section 63.3360(d) material usage, organic HAP usage, volatile matter usage, and coating solids usage and compliance demonstrations using these data in accordance with 40 CFR Section 63.3370(c).	40 CFR Section 63.3410(a); 40 CFR Section 63.10(b)(1); Minn. R. 7011.7385
COMPLIANCE DEMONSTRATION	hdr
The monthly average of all coating materials used at an existing affected source does not exceed 0.2 kg organic HAP per kg coating solids as-applied on a monthly average basis using equation 5 of Section 63.3370 as specified in the following requirements.	40 CFR Section 63.3370(a)(2)(iv); 40 CFR Section 63.3370(c)(5)(ii); Minn. R. 7011.7385
The Permittee must determine the organic HAP applied on these web coating lines using Equation 5 of Appendix D of this permit. The organic HAP emitted from an uncontrolled web coating line is equal to the organic HAP applied on that web coating line.	40 CFR Section 63.3370(c)(4); Minn. R. 7011.7385
By the end of each calendar month, the Permittee shall calculate the following for the previous calendar month: 1) The total organic HAP emitted by summing the HAP emissions calculated for all units subject to 40 CFR pt. 63, subp. JJJJ as detailed earlier in this permit; 2) The coating solids content of each coating material applied during the month following the procedure detailed earlier in this permit; and 3) The total organic HAP emission rate based on coating solids applied using Equation 5 of Appendix D of this permit.	40 CFR Section 63.3370(c)(4); Minn. R. 7011.7385
REPORTING	hdr
Content of Compliance Status Report: At a minimum, the report shall include: 1) Company name and address; 2) A statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report; 3) Date of report and beginning and ending dates of the reporting period; 4) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted; and 5) For each deviation from an emission limitation (emission limit or operating limit) that applies to you, the information listed in 40 CFR Section 63.3400(c)(2)(v)(A)-(C).	40 CFR Section 63.3400(c)(2); Minn. R. 7011.7385

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-41

05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

**Subject Item: FS 904 Intermediate Chip Booster Station (Blower with cyclone)****Associated Items:** CE 903 Single Cyclone

<b>What to do</b>	<b>Why to do it</b>
Total Particulate Matter: less than or equal to 3.0 lbs/hour	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Particulate Matter < 10 micron: less than or equal to 2.9 lbs/hour	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
Periodic Monitoring: the Permittee shall perform proper maintenance of the cyclone so as to prevent excessive amounts of particulate matter from being emitted from the associated stack/vents.	Minn. R. 7007.0800, subp. 4

**TABLE B: SUBMITTALS**

B-1 05/05/08

Facility Name: Boise White Paper LLC - Intl Falls  
Permit Number: 07100002 - 008

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.

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 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:

AQ Permit Technical Advisor  
Industrial 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

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 05/05/08

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Relative Accuracy Test Audit (RATA) Notification	due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	EU320, EU340, EU420, EU430, EU440, EU450, EU460

**TABLE B: RECURRENT SUBMITTALS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

What to send	When to send	Portion of Facility Affected
Ambient Air Monitoring Report	due 45 days after end of each calendar quarter starting 09/09/1999. This is the TRS Ambient Air Monitoring Report. This is a state only requirement and is not federally enforceable or enforceable by citizens under the Act.	Total Facility
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar quarter starting 03/14/2004.	EU320
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Cylinder Gas Audit.	EU440
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The EER must contain all of the information requested in 40 CFR 60.7(c). The EER shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU440
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU420
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions. The first EER for the CO CEMS will be due after the 2nd quarter, 2002. The first quarter in 2002 will be used as a data collection and analysis period as allowed in the June 28, 2001, stipulation agreement	EU430
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions. The report must contain the required elements specified in 40 CFR Section 63.10(c).	EU320
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The TRS CEMS EER shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU450, EU460
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1 as amended). The TRS CEMS EER shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU340



**TABLE B: RECURRENT SUBMITTALS**

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 008

Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 09/09/1999 (Submit Deviations Reporting Form DRF-1). Excess emissions for opacity are defined in 40 CFR Section 60.45(g)(1). The COMS EER shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU320, EU430
Compliance Status Report	due 30 days after end of each calendar half-year starting 12/05/2005, including the information listed for EU 909 listed in Table A.	EU909
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar half-year following COMS Calibration Error Audit.	EU430
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar half-year following Cylinder Gas Audit.	EU320, EU420, EU430
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 09/09/1999 . 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.	Total Facility
Annual Report	due 30 days after end of each calendar year starting 09/09/1999. A report of the previous 12 monthly 12-month rolling average calculations for the annual capacity factor shall be submitted.	EU440, EU450, EU460
Compliance Certification	due 31 days after end of each calendar year starting 09/09/1999 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604.	Total Facility
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar year following Cylinder Gas Audit.	EU340, EU450, EU460
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).	EU320, EU420, EU430, EU440
Compliance Status Report	due 30 days after end of each calendar 24 months starting 04/15/1999 (following initial Compliance Status Report). The Compliance Status Report will serve as the non-binding control strategy report and shall be prepared in accordance with the requirements in 40 CFR Section 63.455(b).	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar 60 months following CEMS Relative Accuracy Test Audit (RATA).	EU340, EU450, EU460

## APPENDIX C – Insignificant Activities

Facility Name: Boise White Paper LLC – International Falls

Permit Number: 07100002-008

### Insignificant Activities Not Required to be Listed

LOCATION	EMISSION UNIT	REFERENCES
Bldg. 10	Sewer Tank	7007.1300 Subp. 2.F
Outside	Diesel Tank	7007.1300 Subp. 2.E.3
Outside	Gas Tank	7007.1300 Subp. 2.E.4
Bldg. 4	Sewers	7007.1300 Subp. 2.F
Bldg. 4	Air Conditioning Units	7007.1300 Subp. 2.K(5)
Bldg. 4	Lube Oil Tank (4)	7007.1300 Subp. 2.E(2)
Woodyard	Mobile Equipment Emissions	7007.1300 Subp. 2.K(3)
Woodyard	Diesel Oil Storage Tank(s)	7007.1300 Subp. 2.E.3
Garage	Motor Vehicle Exhaust	7007.1300 Subp. 2.K(3)
Base Mill Machine Shop	Metal cutting	7007.1300 Subp. 2.D(3)
M,D & W	Forge/Foundry	7007.1300 Subp. 2.C(2)
Plant Yard	Motor Vehicle Exhaust	7007.1300 Subp. 2.B(3)
Mill	Vehicle Exhaust Inside Buildings	7007.1300 Subp. 2.K(3)
Bdlg. 40	Sewer Drain	7007.1300 Subp. 2.F

### Insignificant Activities Required to be Listed

LOCATION	EMISSION UNIT	REFERENCES
	<b>BLEACHING AREA</b>	
Bldg. 32	Alkaline Sewer	7007.1300 , Subpart 4
Bldg. 31	Bleached HW H/D Chest	7007.1300 , Subpart 4
Bldg. 31	Bleached SW H/D Chest	7007.1300 , Subpart 4
Bldg. 31	Bleached Trans. H/D Chest	7007.1300 , Subpart 4
Bldg. 31	Building Sewer	7007.1300 , Subpart 4
Bldg. 31	FF Decker Filtrate Tank	7007.1300 , Subpart 4
Bldg. 31	FF Decker Hood	7007.1300 , Subpart 4
Bldg. 31	Lab	7007.1300, Subpart 3.G
Bldg. 51	Methanol Tank	7007.1300 , Subpart 4
Bldg. 31	Pre-wash Blend Chest	7007.1300 , Subpart 4
Bldg. 31	Pre-wash Filtrate Tank	7007.1300 , Subpart 4
Bldg. 32	Sulfuric Acid Tank & Unloading	7007.1300 , Subpart 4
	<b>POWER BOILERS</b>	
Outside Bldg. 10 <sup>1</sup>	Bark Handling Cyclone	7011.0065, Subpart 1 (A)
Outside Bldg. 10	Ash Pit	7007.1300 , Subpart 4
Bldg. 10	Blow Down Tank	7007.1300 , Subpart 4
Bldg. 11B	Blow Tank Overflow	7007.1300 , Subpart 4
Bldg. 10	Condensate Collection Tank	7007.1300 , Subpart 4

<sup>1</sup> These sources are insignificant by the Control Equipment Rule

Bldg. 10	Flash Tank	7007.1300 , Subpart 4
Bldg. 10	Laboratory	7007.1300 , Subpart 3.G
Bldg. 10	Natural Gas Air Heater	7007.1300, Subpart 3.A
Bldg. 10	Sewer U-drain - Bldg 10	7007.1300 , Subpart 4
Bldg. 11B	Sewer U-drain - Bldg. 11B	7007.1300 , Subpart 4
Outside Bldg. 10	Sludge Pit	7007.1300 , Subpart 4
	<b>CHEMICAL RECOVERY AREA</b>	
Bldg. 33	4th Causticizer	7007.1300 , Subpart 4
Bldg. 33	Concentrated Acid Tank	7007.1300 , Subpart 4
Bldg. 20D	Deaerator	7007.1300 , Subpart 4
Bldg. 33	Dilute Acid Tank	7007.1300 , Subpart 4
Bldg. 34	Dregs Drop Pt. From Conveyor to Mud Pit	7007.1300 , Subpart 4
Bldg. 34	Dregs Drop Pt. From Dregs Filt. to Convey.	7007.1300 , Subpart 4
Bldg. 34	Dregs Filter Hood Exhaust	7007.1300 , Subpart 4
Bldg. 34	Dregs Precoat Filter Process	7007.1300 , Subpart 4
Bldg. 34	Dregs Surge Tank	7007.1300 , Subpart 4
Bldg. 20C	Evaporator Condensate Flash Tank	7007.1300 , Subpart 4
Bldg. 33	Flexible Liquor Storage Tank (WL, GL, or BL)	7007.1300 , Subpart 4
Bldg. 20 <sup>2</sup>	Fresh Lime Silo	7011.0065, Subpart 1 (A)
Bldg. 34	Lime Kiln Scrubber Clarifier	7007.1300 , Subpart 4
Bldg. 34	Lime Mud & Dregs Filter Vacuum Pumps	7007.1300 , Subpart 4
Bldg. 34	Lime Mud Drop Pt-Convey. to Mud Pit	7007.1300 , Subpart 4
Bldg. 34	Lime Mud Drop Pt-Lime Mud Filt to Conv.	7007.1300 , Subpart 4
Bldg. 33	Lime Mud Mix Tank	7007.1300 , Subpart 4
Bldg. 34	Lime Mud Pit	7007.1300 , Subpart 4
Bldg. 34	Lime Mud Precoat Filter Process	7007.1300 , Subpart 4
Bldg. 33	Lime Mud Storage Tank	7007.1300 , Subpart 4
Bldg. 20D	Recovery Furnace Chemical Feed System	7007.1300 , Subpart 4
Bldg. 20C	Sewer U-drain - Bldg. 20C	7007.1300 , Subpart 4
Bldg. 20C	Soap Tank	7007.1300 , Subpart 4
Bldg. 20	Spill Collection Tanks	7007.1300 , Subpart 4
Bldg. 33	Weak Wash Tank	7007.1300 , Subpart 4
Bldg. 34	White Liquor Pressure Filter	7007.1300 , Subpart 4
Bldg. 36	White Liquor Storage	7007.1300 , Subpart 4
	<b>PULPING</b>	
Bldg. 24 <sup>2</sup>	#1 Wood Chip Cyclone	7011.0065, Subpart 1 (A)
Bldg. 24 <sup>2</sup>	#2 Wood Chip Cyclone	7011.0065, Subpart 1 (A)
Bldg. 24	Digester Chip Fill Chutes	7007.1300 , Subpart 4
Bld. 22	Dump Tanks (Screening Room)	7007.1300 , Subpart 4
Chip Line <sup>2</sup>	Intermediate Chip Cyclone	7011.0065, Subpart 1 (A)
Bldg 22A	Knot Tank & Knots Handling	7007.1300 , Subpart 4
Bldg. 31	Lab	7007.1300, Subpart 3.G
Bldg. 22A	No. 2 Washer Filtrate Tank	7007.1300 , Subpart 4
Bldg. 22A	No. 3 Washer Filtrate Tank	7007.1300 , Subpart 4

<sup>2</sup> These sources are insignificant by the Control Equipment Rule

Bldg 22A	No. 4 Washer Filtrate Tank	7007.1300 , Subpart 4
Bldg. 21	Pressure Screen Accepts Tanks	7007.1300 , Subpart 4
Bldg. 21	Pressure Screen Rejects Tanks	7007.1300 , Subpart 4
Bldg. 21	Primary Pressure Screen	7007.1300 , Subpart 4
Bldg. 21	Quatinary Pressure Screen	7007.1300 , Subpart 4
Bldg 22A	Riffle Screen	7007.1300 , Subpart 4
Bldg. 21	Secondary Pressure Screen	7007.1300 , Subpart 4
Bldg. 51	Talc Slurry Tank	7007.1300 , Subpart 4
Bldg. 21	Tertiary Pressure Screen	7007.1300 , Subpart 4
Bldg. 51	Turpentine Storage Tank	7007.1300 , Subpart 4
Bldg. 21	U-Sewer Drain - Bldg. 21	7007.1300 , Subpart 4
Bldg. 22A	U-Sewer Drain - Bldg. 22A	7007.1300 , Subpart 4
Bldg. 24	U-Sewer Drain - Bldg. 24	7007.1300 , Subpart 4
Bldg. 50	U-Sewer Drain - Bldg. 50	7007.1300 , Subpart 4
Bldg. 51	U-Sewer Drain - Bldg. 51	7007.1300 , Subpart 4
Bldg. 24	Unit Heater #1	7007.1300, Subpart 3.A
Bldg. 24	Unit Heater #2	7007.1300, Subpart 3.A
	<b>WASTEWATER COLLECTION &amp; TREATMENT</b>	
Treat. Plant	#2 Lift Station	7007.1300 , Subpart 4
Treat. Plant	#2 Lift Station Surge Tank	7007.1300 , Subpart 4
Treat. Plant	#3 Lift Station Defoamer Tank	7007.1300 , Subpart 4
Treat. Plant	#8 Lift Station Defoamer Tank	7007.1300 , Subpart 4
Treat. Plant	Ammonia Tank for Filter Plant	7007.1300 , Subpart 4
Treat. Plant	Belt Presses	7007.1300 , Subpart 4
Filter Plant	Diesel oil-fired water pump	7007.1300 , Subpart 4
Filter Plant	Diesel oil-fired water pump	7007.1300 , Subpart 4
Filter Plant	Dry Polymer Drop	7007.1300 , Subpart 4
Filter Plant	Filter Plant - Chemical Storage Tank	7007.1300 , Subpart 4
Treat. Plant	Foam Chamber	7007.1300 , Subpart 4
IC	Insulite Clarifier	7007.1300 , Subpart 4
Filter Plant	Laboratory	7007.1300, Subpart 3.G
Filter Plant	Laboratory	7007.1300, Subpart 3.G
O <sub>2</sub> Plant	Laboratory	7007.1300, Subpart 3.G
Filter Plant	Main Sulfuric Acid Storage Tk. & Unloading	7007.1300 , Subpart 4
Old Wood Rm	New Defoamer Tank	7007.1300 , Subpart 4
Filter Plant	New Demin Acid Day Tank	7007.1300 , Subpart 4
Bldg AA	No. 3 Lift Station	7007.1300 , Subpart 4
Bldg 106	No. 8 Lift Station	7007.1300 , Subpart 4
O <sub>2</sub> Plant	O2 Plant Degreasing	7007.1300 , Subpart 4
Bldg. 111	Oil Accumulator Tank	7007.1300 , Subpart 4
Old Wood Rm	Old Defoamer Tank	7007.1300 , Subpart 4
Filter Plant	Old Demin Acid Day Tank	7007.1300 , Subpart 4
Treat. Plant	Old Woodroom Sanitary Lift Station	7007.1300 , Subpart 4
Bldg. 46	Refuse Disposal Site	7007.1300 , Subpart 4
Filter Plant	Salt Drop	7007.1300 , Subpart 4

Treat. Plant	Screw Presses	7007.1300 , Subpart 4
Treat. Plant	Sludge Press Dry Polymer Drop	7007.1300 , Subpart 4
Treat. Plant	Sludge Slurry Tank	7007.1300 , Subpart 4
Bldg. 51	Sodium Silicate Bldg.	7007.1300 , Subpart 4
Treat. Plant	Splitter Building	7007.1300 , Subpart 4
Treat. Plant	Sulfuric Acid Tank Inside	7007.1300 , Subpart 4
Treat. Plant	Sulfuric Acid Tank Outside	7007.1300 , Subpart 4
Treat. Plant	Treatment Plant Process Sewer U-drains	7007.1300 , Subpart 4
Bldg 17	UNOX Vent	7007.1300 , Subpart 4
Bldg 40	Water Filtration Plant	7007.1300 , Subpart 4
<b>PAPER MACHINE AREAS</b>		
Bldg. 93	#1 Sheeter Bldg.	7007.1300 , Subpart 4
Outside Bldg. 6B <sup>3</sup>	#1 Size Press Base Mill Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 6B <sup>3</sup>	#1 Wet End Base Mill Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 30 <sup>3</sup>	#2 Size Press I-1 Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 30 <sup>3</sup>	#2 Wet End I-1 Starch Silo	7011.0065, Subpart 1 (A)
Bldg. 4	#4 PM Natural Gas Dryer	7007.1300 , Subpart 4
Bldg 4	A-mixer (BM)	7007.1300 , Subpart 4
Bldg. 30	Additive Area (#1 PM)	7007.1300 , Subpart 4
Bldg. 30	Additive Storage Area (#1 PM)	7007.1300 , Subpart 4
Bldg. 4	ASA Boilout Tank	7007.1300 , Subpart 4
Bldg. 30	ASA Storage Tank	7007.1300 , Subpart 4
Bldg 4	B-mixer (BM)	7007.1300 , Subpart 4
Bldg. 30	Broke Thickener Feed Chest	7007.1300 , Subpart 4
Bldg. 30	Caustic Boilout Tank	7007.1300 , Subpart 4
Bldg. 6A	Chemical Enclosure	7007.1300 , Subpart 4
Bldg. 4	Coater Broke Tank	7007.1300 , Subpart 4
Bldg. 30	Cooked Size Press Starch Tanks	7007.1300 , Subpart 4
Bldg. 4	Cooked Wet End Starch Tank	7007.1300 , Subpart 4
Bldg. 30	Cooked Wet End Starch Tanks	7007.1300 , Subpart 4
Bldg. 30	Deaerator Vacuum (#1 PM)	7007.1300 , Subpart 4
Bldg. 30	Hardwood and Softwood Levelling Chests	7007.1300 , Subpart 4
Bldg. 4	Hot Melt Glue Pots (BM)	7007.1300 , Subpart 4
Bldg. 4	Kady Mill Blend Tank	7007.1300 , Subpart 4
Bldg. 4	Kady Mill Mix Tank	7007.1300 , Subpart 4
Bldg. 30	Laboratory	7007.1300 , Subpart 3.G
Bldg. 4	Laboratory	7007.1300, Subpart 3.G
Bldg. 4	Laboratory Testing Area (BM)	7007.1300, Subpart 3.G
Bldg. 30	Machine Dump Chests	7007.1300 , Subpart 4
Bldg. 30	NG-Fired Space Heaters (#1 PM)	7007.1300, Subpart 3.A
Bldg. 30	No. 1 PM Broke Storage Chest	7007.1300 , Subpart 4
Bldg. 30	No. 1 PM Machine Chest	7007.1300 , Subpart 4
<b>PAPER MACHINE AREAS</b>		
Bldg. 4	No.2 PM Cycle Tanks (2) - HW & SW	7007.1300 , Subpart 4

<sup>3</sup> These sources are insignificant by the Control Equipment Rule

Bldg. 4	No.3 PM Cycle Tanks (2) - HW & SW	7007.1300 , Subpart 4
Bldg. 4	No.4 PM Calender NG-fired Heater (BM)	7007.1300 , Subpart 4
Bldg. 4	No.4 PM Cycle Tanks (2) - HW & SW	7007.1300 , Subpart 4
Bldg. 30	Open Dye Tanks (6) (#1 PM)	7007.1300 , Subpart 4
Bldg. 30	Paint Storage Area	7007.1300 , Subpart 4
Bldg. 4	Paint Storage Areas	7007.1300 , Subpart 4
Bldg. 4	Paper shredder (BM)	7007.1300 , Subpart 4
Bldg. 30	Retention Aid Mix Tank	7007.1300 , Subpart 4
Bldg. 30	Scripset Storage Tank	7007.1300 , Subpart 4
Bldg. 4	Scripset Tanks (2) (BM)	7007.1300 , Subpart 4
Bldg. 4	Sheeter Trim System (BM)	7007.1300 , Subpart 4
Bldg 4	Solvent Drum Storage Areas (BM)	7007.1300 , Subpart 4
Bldg. 6A	Starch Slurry	7007.1300 , Subpart 4
Bldg. 4	Stock Hydraulic Tanks (4)	7007.1300 , Subpart 4
Bldg. 4	Stock Preparation	7007.1300 , Subpart 4
Bldg. 4	Stock Tanks (6)	7007.1300 , Subpart 4
Bldg. 30	Stuff Box	7007.1300 , Subpart 4
Bldg. 4	Sulfuric Acid Tank #3 (BM)	7007.1300 , Subpart 4
Bldg. 30	U-Drain/Sewer Inside Bldg.	7007.1300 , Subpart 4
Bldg. 4	Upper White Water Chest	7007.1300 , Subpart 4
Bldg. 30	Various Parts Cleaning Compounds	7007.1300 , Subpart 4
Bldg. 4	Warehouse Space Heaters (BM)	7007.1300, Subpart 3.A
Bldg. 30	Welding	7007.1300, Subpart 3.H(4)
Bldg. 4	Wet End Slurry Tank (2)	7007.1300 , Subpart 4
<b>WOODYARD</b>		
Woodyard	Bark Hog	7007.1300 , Subpart 4
Woodyard <sup>4</sup>	Blower Feed Screen #1	7011.0065, Subpart 1 (A)
Woodyard <sup>4</sup>	Blower Feed Screen #2	7011.0065, Subpart 1 (A)
Woodyard <sup>4</sup>	Blower Feed Screen #3	7011.0065, Subpart 1 (A)
Woodyard	Chipper Blowers (5)	7007.1300 , Subpart 4
Woodyard	Small Sawdust Piles	7007.1300 , Subpart 4
Chipper Bldg.	Space Heaters	7007.1300, Subpart 3.A
<b>MISCELLANEOUS SOURCES</b>		
Instrument Shop	Blasting booth	7007.1300 , Subpart 4
Bldg. 39	Blueprint Machine	7007.1300, Subpart 3.H.5
Bldg. 39	Blueprint Machine	7007.1300, Subpart 3.H.5
M,D & W	Chemical Storage Area	7007.1300 , Subpart 4
MA Mort, O'Leary, Fagen	Contractor Welding Areas (3)	7007.1300, Subpart 3.H(4)
Bldg. 40	Degasifier Vacuum	7007.1300 , Subpart 4
Bldg 150	Degreaser - 1	7007.1300 , Subpart 4
Bldg 30	Degreaser - 14	7007.1300 , Subpart 4
Bldg. 17	Degreaser - 19	7007.1300 , Subpart 4

<sup>4</sup> These sources are insignificant by the Control Equipment Rule

Bldg 24	Degreaser - 2	7007.1300 , Subpart 4
Bldg 30	Degreaser - 29	7007.1300 , Subpart 4
Bldg 13	Degreaser - 3	7007.1300 , Subpart 4
Bldg 14	Degreaser - 4	7007.1300 , Subpart 4
Bldg 14	Degreaser - 6	7007.1300 , Subpart 4
MD&W	Degreasers - 12, 13	7007.1300 , Subpart 4
Chip Proc.	Degreasers - 12, 13	7007.1300 , Subpart 4
Bldg 10A	Degreasers - 4, 5	7007.1300 , Subpart 4
Fugitive	Flanges, Pumps, Valves, etc.	7007.1300 , Subpart 4
Base Mill Machine Shop	Lead dryer	7007.1300, Subpart 3.B(1)
M,D & W	Locomotive exhaust emissions	7007.1300, Subpart 3.K(3)
Bldg. 35	Natural Gas Heater Unit #1	7007.1300, Subpart 3.A
Bldg. 39	Natural Gas Heater Units (4) #2	7007.1300, Subpart 3.A
Bldg. 102	Natural Gas Heater Units (4) #3	7007.1300, Subpart 3.A
Base Mill Electric Shop	Oven Dryer/Incinerator	7007.1300 , Subpart 4
Instrument Shop	Soldering	7007.1300, Subpart 3.H(4)
M,D & W	Space Heaters #2	7007.1300, Subpart 3.A
M,D & W	Vehicle exhaust	7007.1300, Subpart 3.K(3)
Finishing/Shipping Shop	Welding #7	7007.1300, Subpart 3.H(4)
Garage	Welding #1	7007.1300, Subpart 3.H(4)
Base Mill Pipe	Welding #2	7007.1300, Subpart 3.H(4)
Power & Recovery Shop	Welding #3	7007.1300, Subpart 3.H(4)
Base Mill Mill Right Shop	Welding #6	7007.1300, Subpart 3.H(4)
No. 1 PM Mill Right	Welding #9	7007.1300, Subpart 3.H(4)
Base Mill Machine Shop	Welding areas (2) #4	7007.1300, Subpart 3.H(4)
Pulp Mill Shop	Welding areas (3) #5	7007.1300, Subpart 3.H(4)
M,D & W	Welding areas (4) #10	7007.1300, Subpart 3.H(4)
Training Shop	Welding areas (4) #8	7007.1300, Subpart 3.H(4)
Base Mill Pipe	Welding Rod Oven	7007.1300, Subpart 3.H(4)
Instrument Shop	Wood working machinery	7007.1300 , Subpart 4

**APPENDIX D – Equation to show compliance with 40 CFR Pt. 63, Subp. JJJJ**

**Facility Name:** Boise White Paper LLC – International Falls

**Permit Number:** 07100002-008

Equation to show compliance with 40 CFR §63.3320(b)(3)

$$H_s = \frac{\sum_{i=1}^p C_{hi} M_i + \sum_{j=1}^q C_{hij} M_{ij} - M_{vret}}{\sum_{i=1}^p C_{si} M_i + \sum_{j=1}^q C_{sij} M_{ij}} \quad \text{Eq. 5}$$

Where:

$H_s$  = Monthly average, as-applied, organic HAP to coating solids ratio, kg organic HAP/kg coating solids applied.

$p$  = Number of different coating materials applied in a month.

$C_{hi}$  = Organic HAP content of coating material,  $i$ , as-purchased, expressed as a mass fraction, kg/kg.

$M_i$  = Mass of as-purchased coating material,  $i$ , applied in a month, kg.

$q$  = Number of different materials added to the coating material.

$C_{hij}$  = Organic HAP content of material,  $j$ , added to as-purchased coating material,  $i$ , expressed as a mass fraction, kg/kg.

$M_{ij}$  = Mass of material,  $j$ , added to as-purchased coating material,  $i$ , in a month, kg.

$M_{vret}$  = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in §63.3370.

$C_{si}$  = Coating solids content of coating material,  $i$ , expressed as a mass fraction, kg/kg.

$C_{sij}$  = Coating solids content of material,  $j$ , added to as-purchased coating material,  $i$ , expressed as a mass-fraction, kg/kg.



**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 07100002-008**

This technical support document is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

**1. General Information**

**1.1 Applicant and Stationary Source Location:**

Applicant/Address	Stationary Source/Address (SIC Code: 2611, 2621)
Boise White Paper, LLC 1111 West Jefferson Street Boise, ID 83702	400 2 <sup>nd</sup> St International Falls Koochiching County
Contact: David Reimer Phone: 218-285-5170	Kirby Dahlquist 218-285-5264

**1.2 Description of the Facility and Permitting History**

Boise Cascade Corporation operates an integrated Kraft pulp and paper mill in International Falls. The mill manufactures a variety of coated and uncoated fine paper products. The facility consists of a woodyard, chip processing center, pulp mill, bleach plant, chemical recovery system, power plant, wastewater treatment facility, industrial landfill, paper mill, finishing and sheeting, warehouse, and shipping facilities. In 1989/1990, Boise underwent an expansion that included the installation of a new paper machine, a new bleach plant, a new lime kiln, modification of the chemical recovery furnace, and other upgrades.

A Part 70 permit (07100002-001) was issued to Boise in September, 1999. The Part 70 operating permit was a consolidation of existing conditions from the 1989 Prevention of Significant Deterioration Program (PSD) permit and subsequent amendments. The Part 70 permit also authorized a modification that resulted in a significant net emissions increase subject to New Source Review for Boiler No. 2. The modification was for an overfire air project, which is a waste reduction measure that will allow Boise to burn more sludge and bark in the boiler rather than landfilling the sludge and bark.

Boise received a major amendment (07100002-003) in October, 2000, for Boise's proposed Efficiency Improvement Project. The project was considered a modification that resulted in a significant net emissions increase under PSD. The purpose of the project was to allow Boise to increase pulp production and generation of black liquor solids so that the facility is less dependent on market pulp. To achieve the higher pulp production and black liquor processing rates, Boise proposed to make several physical modifications.

The Efficiency Improvement Project was evaluated along with the Boiler No. 2 project in an Environmental Assessment Worksheet (EAW) and application for PSD amendment. The project required preparation of a mandatory EAW, because the modifications resulted in increased potential emissions of greater than 100 tpy for at least a single air pollutant. Applications for modifications subject to PSD require major amendments to the permit. Both the Efficiency Improvement Project and the Boiler No. 2 project were subject to the requirement to obtain a major amendment prior to construction on their own, due to the increase in potential-to-emit (PTE).

A minor permit amendment (07100002-004) was issued in August 2001 for installation of a sludge dryer. The dryer allowed Boise to dry the secondary sludge, from the on-site wastewater treatment plant. The sludge is burned in the boiler, rather than being disposed of in the facility's industrial landfill.

A major permit amendment (07100002-005) was issued in November 2002. This permit amendment combined two permit amendment applications. The first permit amendment application was for an increase in Particulate Matter less than 10  $\mu\text{m}$  in size ( $\text{PM}_{10}$ ) limit for the smelt dissolving tank and the lime kiln. Boise submitted a second permit application (January 2002) to increase the Sulfur Dioxide ( $\text{SO}_2$ ) limit on the brownstock washer and for installation of the #3 rotary debarker.

A major permit amendment (07100002-006) was issued in November 2004. This permit amendment included the following: changed CO emission limit for the boilers and incorporated use of a CO CEMS; adjusted CO and  $\text{SO}_2$  limits on #2 boiler, CO and  $\text{NO}_x$  emission rates on recovery furnace, and established Clean Unit Designations; incorporated NESHAP Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills; incorporated changes necessary due to performance tests; and incorporated ownership change from Boise Cascade to Boise Paper LLC.

A major permit amendment (07100002-007) was issued October 2005. This permit amendment was a request from Boise White Paper to remove the requirements for the Moonlight Rock Landfill flare from the permit. The landfill was not contiguous with the facility, and neither the landfill nor the flare was owned or operated by Boise Paper. The landfill and flare were owned by Boise Cascade. Portions of Boise Cascade (excluding the landfill and flare) were purchased by Boise Paper, LLC. Boise Cascade, now known as OfficeMax, still owns the landfill and flare.

### **1.3 Description of the Activities Allowed by this Permit Action**

Addition of an Emergency Generator. This permit action is for a minor amendment to the existing Part 70 operating permit. The reason for this permit action is a request from Boise to install an emergency diesel generator (EU 908) on-site rather than renting a generator periodically from vendors. The generator is rated at 100 kw/125 KVA (135 hp) and is model year 2004. The generator is used for emergency purposes only, therefore in accordance with an EPA memo dated September 6, 1995 its annual hours of operation is limited to 500 hours for

purposes of determining applicable requirements and calculating the potential-to-emit (PTE) for criteria pollutants.

Inclusion of 40 CFR Pt. 63, Subp. JJJJ language. Also included in this minor amendment is a NESHAP notification received on 5/11/2005 for an off-machine coater (EU 909) to incorporate Subpart JJJJ into their permit. The appropriate compliance options have been included in the permit. The NESHAP language does not include a requirement for the facility to submit a SSMP or to provide reporting of malfunctions. The facility is showing compliance with the NESHAP through compliance with material usage limitations, thus the operation and maintenance of the unit does not affect the emissions, and therefore the operation and maintenance (or malfunction) of the emission unit does not impact the ability of the unit to meet any relevant standard. Table 2 of 40 CFR Pt. 63, Subp JJJJ, confirms that there is no need to submit an SSMP for the off-machine coater (EU 909). Finally, the obsolete MACT language located at the Total Facility level of the permit was deleted.

Administrative Correction to GP340. In Permit Action 006, EU303, EU305 and EU307 were moved from GP340 to GP423. While they were successfully added to GP423, they were inadvertently left in GP340. Therefore these EUs have now been removed from GP340.

#### 1.4. Facility Emissions:

**Table 1. Title I Emissions Increase Summary**

Pollutant	Emissions Increase from the Modification (tpy)	Limited Emissions Increase from the Modification (tpy)	Net Emissions Increase (tpy)	PSD/112(g) Significant Thresholds for major sources	NSR/112(g) Review Required? (Yes or No)
PM	0.08	0.08	0.08	25	No
PM <sub>10</sub>	0.08	0.08	0.08	15	No
NO <sub>x</sub>	1.05	1.05	1.05	40	No
SO <sub>2</sub>	0.07	0.07	0.07	40	No
CO	0.23	0.23	0.23	100	No
Ozone (VOC)	0.09	0.09	0.09	40	No
Lead	NA	NA	NA	0.6	No

**Table 2. Non-Title I Emissions Increase Summary**

Pollutant	After Change (lb/hr)*	Before Change (lb/hr)	Net Change (lb/hr)	Insignificant Modification Thresholds (lb/hr <)	Minor and Moderate Amendment Thresholds (lb/hr < or ≥)	Type of Amendment (Minor or Moderate)
PM <sub>10</sub>	0.30	0	0.30	0.855	3.42	Insignificant
NO <sub>x</sub>	4.19	0	4.19	2.28	9.13	Minor
SO <sub>2</sub>	0.28	0	0.28	2.28	9.13	Insignificant
CO	0.90	0	0.90	5.70	22.80	Insignificant
VOC	0.34	0	0.34	2.28	9.13	Insignificant
Lead	NA	0	NA	0.025	0.11	NA

\*Note: Emergency generator with 500 annual hours of operation for PTE calculations. (EPA memo 9/6/1995)

**Table 3. Facility Classification**

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	X		
Part 70 Permit Program	X		
Part 63 NESHAP	X		

## 2. Regulatory and/or Statutory Basis

### New Source Review

The facility is an existing major source under New Source Review regulations. No changes are authorized by this permit.

### Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

### New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the emission units (EU908 & EU909) in this permit action.

### National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is a major source of HAPs. This permit action only addresses the NESHAP for EU 909 submitted in an initial notification of applicability for Subpart JJJJ.

### Minnesota State Rules

There are no Minnesota Standards of Performance triggered by or applicable to the changes authorized by this permit action.

**Table 4. Regulatory Overview of the Modification**

<b>EU, GP or SV</b>	<b>Applicable Regulations</b>	<b>Comments:</b>
EU 908	Minn. R. 7011.2300 subps. 1 & 2	Opacity must be less than or equal to 20 % once operating temperatures have been attained. Sulfur Dioxide must be less than or equal to 0.5 lbs/MMBtu heat input.
EU 908	Minn. R. 7007.0800 subps. 4 & 5	Fuel sulfur content must be less than or equal to 0.5% by weight sulfur content in the diesel fuel used.
EU 909	40 CFR § 63.3320(b)(3); Minn. R. 7011.7385	HAPs – Organic: less than or equal to 20% of the mass of coating solids applied for each calendar month for the web coating line (as defined in 40 CFR § 63.3310)

### 3. Technical Information

#### 3.1 Calculations of Potential to Emit

Emergency Generator (EU 908) rated at 135 hp and 500 hours operation per year.

Sample calculation of potential-to-emit (PTE):

PM (same for PM<sub>10</sub>): (0.0022 lb/hr-hp)(135 hp) = 0.30 lb/hr

(0.30 lb/hr)(500hr/yr)(1ton/2000 lb) = 0.08 tons/yr

SO<sub>2</sub> (1.01S) = 1.01\*0.05% sulfur = 0.051 lb/MMBtu SO<sub>2</sub> < 0.5 lb/MMBtu

Fuel supplier documentation will be kept via delivery tickets with each diesel fuel shipment.

Table of Potential to Emit for the Emergency Generator (EU 908) and the compliance data for the coater MACT for the Off-Machine Coater (EU 909) is attached to this TSD. An electronic version is located in a spreadsheet in Delta.

#### Off Machine Coater (EU 909)

The equation used to demonstrate compliance with 40 CFR pt. 63, subp. JJJJ for “as-applied” compliant coating materials using option 4 is shown in Appendix D to the permit.

#### 3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;

- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

**Table 5. Periodic Monitoring for EU 908 and EU 909**

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
EU 908	Opacity $\leq$ 20%  SO <sub>2</sub> $\leq$ 0.5 lbs/MMBtu  <i>Minn. R. 7011.2300, subps. 1 &amp; 2</i>	May burn only diesel fuel Recordkeeping: Records of fuel type & sulfur content of each delivery with supplier certification  SO <sub>2</sub> content in fuel $\leq$ 0.5% by weight each shipment	Generator must use No. 2 fuel oil with sulfur content 0.05%.; therefore, the likelihood of violating emission limits is small.
EU 908	Minn. R. 7007.0800, subps. 4 & 5	Monthly fuel records, hours of operation, fuel sulfur content	Fuel usage must be less than or equal to 0.5% by weight sulfur content in the diesel fuel used.
EU 909	40 CFR § 63.3320(b)(3); Minn. R. 7011.7385	None	HAPs – Organic: $\leq$ 20% of the mass coating solids applied each calendar month for the web coating line

### **3.3 Insignificant Activities**

Boise White Paper, LLC has several operations which are classified as insignificant activities. These are listed in Appendix C to the permit.

### **3.4 Permit Organization**

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

Appendix D includes the equation to show compliance with 40 CFR Pt. 63, Subp. JJJJ.

### **Comments Received**

EPA 45-day Review Period: March 20, 2008 – May 3, 2008

No comments were received from the EPA during the 45-day review period.

### **4. Conclusion**

Based on the information provided by Boise White Paper, LLC, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 07100002-008 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:      Tarik Hanafy (permit writer/engineer)  
   Robert Beresford (enforcement)  
   Andy Place (stack testing)  
   Trevor Shearen (peer reviewer)  
   Bonnie Nelson (mentor)

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Attachments:      1. Calculation Spreadsheets (in Delta)  
   2. Facility Description and CD-01 forms