

AIR EMISSION PERMIT NO. 07100002- 011
Total Facility Operating Permit - Reissuance

IS ISSUED TO

Boise White Paper LLC

Boise White Paper LLC - Intl 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 reissuance are as described in the Permit Applications Table.

This permit reissuance supersedes Air Emission Permit No. 07100002-010 authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

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

Permit Type: Federal; Pt 70/Major for NSR;

Operating Permit Issue Date: January 21, 2010

Expiration Date: January 21, 2015

All Title I Conditions do not expire.

The Permittee may continue to operate this facility after the expiration date of the permit, per the provision under Minn. R. 7007.0450, subp. 3

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

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

Boise White 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, paper mill, finishing and sheeting, warehouse, and shipping facilities.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
 Permit Number: 07100002 - 011

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 44,200 tons/month using 12-month Rolling Average	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
Black Liquor Solids (BLS) Increase Project Recordkeeping: The Permittee shall monitor the emissions of any regulated NSR pollutant that are expected to increase as a result of the project. NOx, CO and TRS emissions will be monitored using existing continuous emission monitoring systems. Other parameters (PM, PM10, SO2 and VOC's) will be monitored based on stack testing and emission inventory calculation methods. On an annual basis and for a period of 5 years following resumption of normal operation after the change, the Permittee shall calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis. On an annual basis and for a period of 5 years following resumption of normal operation after the change, the Permittee shall calculate the overall change in emissions from the BLS Increase project for each regulated NSR pollutant. (continued below)	40 CFR Section 52.21(r)(6)(iii)
(continued from above) The change in emissions shall be calculated for each unit by subtracting the baseline actual emissions, as submitted in the permit application for the project, from each unit from the actual emissions for the calendar year. The Permittee may exclude, in calculating the increase in emissions from the BLS Increase project, any emissions that the unit could have accommodated during the baseline period and are unrelated to the BLS Increase project (i.e., emissions from less than 41,000 ton/ month on a 12 month rolling average).	40 CFR Section 52.21(r)(6)(iii) (continued)
Annual Report for Black Liquor Solids (BLS) Increase Project: The Permittee shall submit a report to the MPCA if the annual emissions, in tons per year, from the BLS Increase Project, exceed the baseline actual by a significant amount (PSD threshold) for that regulated NSR pollutant and if such emissions differ from the preconstruction estimate as documented in the permit application.. Such report shall be submitted to the MPCA within 60 days after the end of the year. The report shall include the following: (a) The name, address and telephone number of the major stationary source; (b) The annual emissions as calculated pursuant to the BLS Increase Project recordkeeping requirement; and (c) Any other information that the Permittee wishes to include in the report (e.g. an explanation as to why the emissions differ from the preconstruction projection).	40 CFR Section 52.21(r)(6)(v)
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 (virgin bone dried basis) 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<p>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.</p>	<p>Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)</p>
<p>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.</p> <p>This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.</p>	<p>Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)</p>
<p>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.</p> <p>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.</p> <p>This is a state only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act.</p>	<p>Minn. R. 7007.0800, subp. 2 (non-criteria pollutants)</p>
<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. 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&M Plan has been submitted.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Operation and Maintenance Plan: The O&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&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 & 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, subsps. 14 and 16(J)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
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<p>NGC (LVHC) Venting: The Permittee shall control NCG (LVHC) 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 NCG (LVHC) directly to atmosphere. Upon venting NCG (LVHC) 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 (LVHC)-emitting sources in a controlled manner. The NCG (LVHC)-emitting sources, except for the evaporators, shall be shut down within 30 minutes and the remaining sources (the evaporators) shall be shutdown within two hours. The Permittee shall not re-start any of the NCG (LVHC) 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>
<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"> 1. A description of the project 2. Identification of the emission unit(s) whose emissions of an NSR pollutant could be affected 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. <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 & 5</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

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<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 & 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> <ul style="list-style-type: none"> a. The name, address and telephone number of the major stationary source; 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. c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection. 	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 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>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> <ul style="list-style-type: none"> 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 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. 	<p>40 CFR Section 63.450(b) CONTINUED</p>
<p>Monitoring Requirements for Enclosure and Closed-vent Systems:</p> <ul style="list-style-type: none"> 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 calendar month with at least 21 days elapsed between inspections to ensure the opening is maintained in the closed position and sealed. 2) Each closed-vent system required by 40 CFR Section 63.450(a) shall be visually inspected at least once every calendar month with at least 21 days elapsed between inspections 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. 	<p>40 CFR Section 63.453(k)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

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<p>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). 4) Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Section 63.457(e). 5) The valve or closure mechanism specified in 40 CFR Section 63.450(d)(2) shall be inspected at least once every calendar month with at least 21 days elapsed between inspections to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line.</p>	<p>40 CFR Section 63.453(k) CONTINUED</p>
<p>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: (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. (ii) The repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.</p>	<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>MACT REQUIREMENTS - GENERAL PROVISIONS</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>Malfunctions: Malfunctions 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>
<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>GENERAL TOTAL FACILITY REQUIREMENTS</p>	<p>hdr</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
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<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>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>Minn. R. 7019.1000, subp. 3</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>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>Minn. R. 7019.1000, subp. 2</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); 40 CFR Section 64.7(a)</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>
<p>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.</p>	<p>Minn. R. 7011.0020</p>
<p>Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.</p>	<p>Minn. R. ch. 7017</p>
<p>General Performance Test (PT) Requirements:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>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</p>	<p>Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2035, subp. 1-2</p>
<p>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.</p>	<p>Minn. R. 7017.2025</p>
<p>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.</p>	<p>Minn. R. 7019.1000, subp. 1</p>
<p>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:</p> <ol style="list-style-type: none"> 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. 	<p>Minn. R. 7019.1000, subp. 1</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
 Permit Number: 07100002 - 011

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)
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
Continuous Operation: CEMS and COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime includes reasonable periods as listed in Items A, B, C and D of Minn. R. 7017.1090, subp. 2.	40 CFR Section 64.7(c); Minn. R. 7007.0800, subp. 4; Minn. R. 7007.0800, subp. 2; Minn. R. 7017.1090
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 6/08/09, 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 http://www.epa.gov/swercepp or by calling 1-800-424-9346.	40 CFR Section 68
SOLID WASTE STORAGE REQUIREMENTS	hdr
The Permittee shall store any fuels falling under the definition of solid waste in accordance with Minn. R. 7035.2855.	Minn. R. 7035.2855
Prior to operation of a storage facility, owners and operators shall obtain a written certification from an engineer licensed in Minnesota stating that the storage facility is designed and constructed to meet the requirements of this part. A copy of this certification shall be maintained on file by the owner or operator and shall be made available to the Agency upon request.	Minn. R. 7035.2855, subp. 7(A)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: GP 340 LVHC NCG Incineration and Venting

Associated Items: CE 342 Other

- EU 110 Turpentine Decanter
- EU 120 Turpentine Relief Condenser dig. 1-4
- EU 125 Turpentine Relief Condenser dig. 5-8
- EU 130 Pre-evaporator Hotwell
- EU 135 Stripper Feed Tank
- EU 140 Blow Heat Secondary Condenser
- EU 309 Evaporator Hotwell
- EU 340 Lime Kiln
- EU 420 Boiler #1
- EU 430 Boiler #2

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 (LVHC) 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.	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 (LVHC) 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.	Title I Condition: 40 CFR Section 52.21; Minn. R. 7007.3000
NCG (LVHC) Venting: NCG (LVHC) 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 (LVHC) 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: Daily record of emissions - a) hours during which NCG (LVHC) are oxidized in Boiler #1 or #2 b) venting hours Monthly record of: a) 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 (LVHC) oxidation. Boiler #2 SO2 emissions shall be calculated using SO2 CEMS data and boiler operating data, including hours of NCG (LVHC) oxidation.	Title I Condition: Recordkeeping associated with Title I Condition; Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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 (EU 320, 420, 430, 440, 450 and 460).	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 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 the most recent MPCA approved performance test and the applicable production rate. The NOx emissions shall be added to the emissions determined from the CEMS on a daily basis 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

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: GP 421 Kraft Pulping Process Condensates

Associated Items: CE 020 Other

EU 110 Turpentine Decanter

EU 130 Pre-evaporator Hotwell

EU 135 Stripper Feed Tank

EU 309 Evaporator Hotwell

SV 905 UNOX A Basin

SV 906 UNOX B Basin

What to do	Why to do it
<p>HAPs - Total: greater than or equal to 11.1 lbs/ton using Other . Other is defined as condensate collection based on a 14-day average (11.1 lbs of HAP per ton of ODP). The pulping process condensates from equipment systems listed shall in total contain a total HAP mass of 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of ODP for mills that perform bleaching.</p> <p>For purposes of complying with the kraft pulping condensate requirements in 40 CFR Section 63.446, the facility chooses to measure the total HAP concentration as methanol (see 40 CFR Section 63.457(g))</p>	<p>40 CFR Section 63.446(c)(3)</p>
<p>Condensate Treatment - HAPs: Regulated condensates shall be hardpiped to the UNOX closed biological treatment system. The UNOX treatment system shall be operated in a manner that treats the collected condensate according to one or more of the following methods:</p> <ul style="list-style-type: none"> - Discharge the pulping process condensate below the liquid surface of the UNOX biological treatment system and treat the pulping process condensates - Treated to reduce or destroy the total HAPs by 92% or more by weight; or - Treated by removing 10.2 lbs/ton of ODP or achieving a total HAP concentration of 330 ppm or less by weight at the outlet of the control device. 	<p>40 CFR Section 63.446(e)(2), (3) and (5)</p>
<p>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).</p>	<p>40 CFR Section 63.446; 40 CFR Section 63.962(a)(2)</p>
<p>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) or (3) and 40 CFR Section 63.446(e)(3) or (5). Mixed Liquor Volatile Suspended Solids (MLVSS) shall be monitored to demonstrate continuous compliance with the minimum bio-treatment requirement.</p>	<p>40 CFR Section 63.453</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-11

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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

EU 520 No. 3 Paper Machine

EU 530 No. 4 Paper Machine

EU 540 No. 1 Paper Machine

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	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 - 011

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 177 #1 Filtrate Tank Foam Breaker

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 360 Rapid Drain Tank

EU 905 HL Swing Tank

SV 173 Brown Stock Decker

What to do	Why to do it
Emission units EU 303, EU 305, EU 307, EU 323, EU 324, EU 360 and EU 905 are to be voluntarily controlled with this group, but are not subject to Subpart S.	hdr
Periods of excess emissions reported under 40 CFR Section 63.455 shall not be a violation of 40 CFR Section 63.443 (c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed four percent for control devices used to reduce the total HAP emissions from the HVLC system	40 CFR Section 63.443
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. (Applies to EU 173 and EU 175)	40 CFR Section 63.443(c)
Brown stock washer gases shall be combusted in the Recovery Furnace (EU 320) which is subject to 60.283(a)(2)	40 CFR Section 60.283(a)(1)(ii)

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-13

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: SV 173 Brown Stock Decker**Associated Items:** EU 173 Brown Stock Washing

EU 174 Brown Stock Decker

GP 423 HVLC NCG Incineration and Venting

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 H ₂ S.	Title I Condition: 40 CFR Section 52.21(j); (BACT limit); Minn. R. 7007.3000
OPERATIONAL LIMITS	hdr
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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
 MR 907 ClO2 scrubber liquid supply flow rate

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 using 3-hour Block Average 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 95.7 gallons/minute using 3-hour Block Average 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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
 - MR 908 Bleach Plant scrubber liquid supply flow rate
 - MR 909 Bleach Plant scrubber pH
 - MR 910 Bleach Plant scrubber fan

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 monitoring 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 gas scrubber vent gas inlet flow rate or gas scrubber fan operational status; 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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-16

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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
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 4.0 inches of water column using 3-hour Block Average 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 using 3-hour Block Average 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: SV 322 Smelt Dissolving Tank

Associated Items: EU 322 Smelt Dissolving Tank

MR 905 SDT scrubber pressure drop

MR 906 SDT scrubber flow

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 7.3 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; 40 CFR Section 60.282(a)(2)); 40 CFR 63.862(a)(1)(i)(B) (Limit approved by the EPA in a Letter dated September 29, 2008)
Particulate Matter < 10 micron: less than or equal to 7.3 lbs/hour .	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7007.3000; 40 CFR Section 60.282(a)(2)); 40 CFR 63.862(a)(1)(i)(B) (Limit approved by the EPA in a Letter dated September 29, 2008)
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 1595 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 (CE 322 and 323, Venturi Scrubbers)	hdr
Install, calibrate, maintain, and operate a monitoring device for the continuous measurement (at least once every 15 minutes) 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 +/- 5 percent of the design rate. Alternative monitoring parameters may be used with prior approval from the EPA Administrator.	40 CFR Section 64.7(a); 40 CFR Section 60.284(b)(2)(i); 40 CFR Section 63.864(e); Minn. R. 7011.2450; 40 CFR Section 63.864(e) and (j)
Install, calibrate, maintain, and operate a monitoring device for the continuous measurement (at least once every 15 minutes) of the scrubbing liquid flow rate. The monitoring device is to be certified by the manufacturer to be accurate within +/- 5 percent of the design rate. The monitoring device shall be operational upon startup of the control equipment.	40 CFR Section 64.7(a); 40 CFR Section 63.864(e)
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<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>	40 CFR section 64.3(a); Minn. R. 7017.2025, subp. 3
<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>	40 CFR section 64.3(a); Minn. R. 7017.2025, subp. 3
<p>Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility SSM Plan and/or the 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.</p>	40 CFR Sections 63.864(k) and 63.867(c); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 5
<p>After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Smelt Dissolving Tank Vent accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.</p>	40 CFR Section 63.864(k)(2)(iii) and 63.864(k)(3)
<p>On-going compliance provisions. Smelt Dissolving Tank units are required to implement corrective action, when any 3-hour average parameter value is outside the range of values established in paragraph (j) of this section.</p>	40 CFR 63.864 (k)(1)(i)
<p>TESTING REQUIREMENTS</p>	hdr
<p>Performance Test: due before end of each 60 months starting 09/12/2006 to measure Particulate Matter < 10 micron emissions. The next test is due September 12, 2011, then every 60 months thereafter.</p>	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1; 40 CFR 63.865(b)(1)
<p>Performance Test: due before end of each 60 months starting 09/12/2006 to Total Reduced Sulfur (TRS) emissions. The next test is due September 12, 2011, then every 60 months thereafter.</p>	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1; 40 CFR 63.865(b)(1)
<p>Performance Test: due before end of each 60 months starting 09/12/2006 to measure Total Particulate Matter emissions. The next test is due September 12, 2011, then every 60 months (5 years) thereafter.</p>	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
<p>RECORD KEEPING</p>	hdr
<p>NOx Emissions Calculation: The NOx emissions shall be calculated on a semi-annual basis. The NOx emission factor, obtained from the most recent MPCA approved performance test, shall be multiplied by the production rate of the black liquor solids production (virgin bone dried basis). The NOx emissions shall be calculated and converted to a tons/day basis on a daily basis for determining the total NOx emissions from the facility and comparison to the NOx cap (GP 420).</p>	Minn. R. 7007.0800, subp. 6
<p>Excess Emissions Report: Report any/all excess emissions quarterly within 30 days following the end of the calendar quarter. The report must contain the required elements specified in 40 CFR Section 63.10(c). Reporting excess emissions below the violation thresholds of 63.864(k) does not constitute a violation of the Subpart MM standard. When no excess emissions have occurred, the Permittee shall submit a semi-annual report stating that no excess emissions have occurred during the reporting period. Subpart MM excess emission reports may be combined with Subpart S semi-annual excess emission reports.</p>	40 CFR Section 63.867(c), and (c)(1), and (c)(2)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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

- 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
 - 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
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

A-20

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 174 Brown Stock Decker**Associated Items:** SV 173 Brown Stock Decker

What to do	Why to do it
OPERATIONAL LIMITS	hdr
<p>HAPs - Total: less than or equal to 400 parts per million by weight (process water).</p> <p>(For purposes of complying with this requirement the facility chooses to measure the total HAP concentration as methanol, see 40 CFR Section 63.457(f)(2))</p> <p>For purposes of complying with the kraft pulping condensate requirements in 40 CFR Section 63.446, the owner or operator shall measure the total HAP concentration as methanol (see 40 CFR Section 63.457(f)(2))</p>	40 CFR Section 63.443(a)(iv)(B)
PERFORMANCE TESTING	hdr
<p>Performance Test: due before end of each 60 months following Permit Issuance.</p> <p>Test to verify that process water is less than or equal to the total HAP concentration of 400 parts per million by weight.</p>	Minn. R. 7017.2025, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
 Permit Number: 07100002 - 011

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 Opacity COM
 MR 322 Recovery Furnace NOx CEM
 MR 323 Recovery Furnace TRS CEM
 MR 324 Recovery Furnace CO CEM
 MR 325 Recovery Furnace O2 CEM
 SV 320 Recovery Furnace

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 27.0 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 63.862(a)(1)(i), 40 CFR Section 60.282(a)(i); Minn. R. 7007.3000 (Limit approved by the EPA in a Letter dated September 29, 2008)
Particulate Matter < 10 micron: less than or equal to 19.2 lbs/hour .	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000 (Limit approved by the EPA in a Letter dated September 29, 2008)
Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one six-minute period per hour of not more than 27 percent opacity. This is more stringent than 35% opacity limit of NSPS subp. BB and MACT subp. MM, which also applies. Opacity in excess of this limit shall be considered an excursion under 40 CFR Section 64.6(c)(2).	40 CFR Section 64.3; 40 CFR Section 63.864(c)(2)(i); 40 CFR Section 60.282(a)(ii); Minn. R. 7011.0515 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 110 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 538 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
Carbon Monoxide: less than or equal to 2289 tons/year using 12-month Rolling Average	Minn. R. 7008.0800, subp. 2
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
Sulfur Content of Fuel: less than or equal to 0.05 percent by weight distillate oil sulfur content. The potential to emit from the allowable fuel is 0.051 lb/MMBtu.	Minn. R. 7007.0800, subp. 2
OPERATIONAL LIMITS	hdr
Fuel burned: limited to natural gas. HVLC NCGs and black liquor solids (BLS) (virgin bone dried basis) and BLS blended with distillate oil (#1 or #2) are also oxidized in the recovery furnace.	Title I Condition: 40 CFR Section 52.21

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<p>Process Throughput: less than or equal to 1595 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
<p>Process Throughput: less than or equal to 30.0 gallons/hour using 12-hour Average (calculated on a twelve-hour block average) of distillate oil (#1 or #2)</p>	Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
<p>Recordkeeping: records of the black liquor solids firing rates in units of tons/day shall be maintained.</p>	40 CFR Section 63.867(c)(1)
<p>The Administrator will not consider periods of excess emissions to be indicative of a violation provided that the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed six percent for average opacities from recovery furnaces.</p>	40 CFR 60.284
<p>The Recovery Furnace is in violation of the standards of 63.862 if the opacity is greater than 35 percent for 6 percent or more of the operating time within any quarterly period;</p>	40 CFR 63.864 (k)(2)(i)
<p>The Administrator will not consider periods of excess emissions reported under paragraph (d) of this section to be indicative of a violation provided that the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed one percent for TRS emissions from recovery furnaces.</p>	40 CFR 60.284
<p>RECORDKEEPING REQUIREMENTS</p>	hdr
<p>Monthly Recordkeeping -- Sulfur Dioxide and Carbon Monoxide.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following: 1) The total emissions for the previous calendar month 2) The 12-month rolling sum of emissions for the previous 12-month period by summing the monthly emissions data for the previous 12 months.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Record total distillate oil usage in gallons once every 12 hours.</p>	Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
<p>Record and calculate every 12 hours the 12 hour block average of distillate process throughput, in gallons/hour, of distillate oil that was burned in the recovery furnace to verify that the distillate process throughput was less than or equal to 30.0 gallons/hour using a 12-hour Block Average. Records shall be maintained for 5 years.</p>	Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
<p>Fuel Supplier Documentation: The Permittee shall obtain and maintain fuel supplier documentation for each shipment of fuel distillate oil (#1 and #2), documenting that the sulfur content does not exceed 0.05% by weight. Records shall be maintained for 5 years.</p>	Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
<p>POLLUTION CONTROL EQUIPMENT REQUIREMENTS</p>	hdr
<p>ESP Monitoring: The COMS for this emission unit shall be used to assess proper operation of this ESP.</p>	40 CFR Section 64.7(a); 40 CFR Section 63.865(c)(1); Minn. R. 7007.0800, subp. 2
<p>TESTING REQUIREMENTS</p>	hdr
<p>Performance Test: due before end of each 60 months starting 09/13/2006 to measure Total Particulate Matter emissions. The next test is due September 13, 2011, then every 60 months (5 years) thereafter.</p>	Minn. R. 7017.2020, subp. 1; 40 CFR Section 63.865(b)(1)
<p>Performance Test: due before end of each 60 months starting 09/13/2006 to measure Particulate Matter < 10 microns. The next test is due September 13, 2011, then every 60 months (5 years) thereafter.</p>	Minn. R. 7017.2020, subp. 1; 40 CFR Section 63.865(b)(1)
<p>COMS REQUIREMENTS</p>	hdr
<p>Emissions Monitoring: The Permittee shall use a COMS to measure Opacity emissions from EU320.</p>	Title I Condition: Monitoring associated with Title I emission limits; Minn. R. 7017.1006; 40 CFR Section 63.865(c)(1); 40 CFR Section 64
<p>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.</p>	Minn. R. 7017.1211, subp. 2; 40 CFR 60.13(d)(2); 40 CFR Section 63.865(c)(1)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls
 Permit Number: 07100002 - 011

Excess Emissions/Downtime Reports (EER's): due 30 days after end of each calendar quarter starting at permit issuance (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.	Minn. R. 7017.1110, subp. 1 & 2 ; 40 CFR Section 63.865(c)(1)
SSM Excess Emissions Report: Report any/all excess emissions quarterly within 30 days following the end of the calendar quarterly. The report must contain the required elements specified in 40 CFR Section 63.10(c). Reporting excess emissions below the violation thresholds of 63.864(k) does not constitute a violation of the Subpart MM standard. When no excess emissions have occurred, the Permittee shall submit a semi-annual report stating that no excess emissions have occurred during the reporting period. Subpart MM excess emission reports may be combined with Subpart S semi-annual excess emission reports.	40 CFR Section 63.867(c), (c)(1), and (c)(2)
On-going compliance provisions. Recovery Furnace units are required to implement corrective action if the monitoring exceedances, when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity.	40 CFR 63.864 (k)(1)(i)
COMS Calibration Error Audit: due before end of each calendar half-year starting 01/01/2009. 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)
COMS Calibration Error Audit Results Summary: due 30 days after end of each calendar half-year starting 01/01/2009.	Minn. R. 7017.1220; 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); 40 CFR Section 64.9(b)
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 within 30 days after monitor certification. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1.	40 CFR Section 64.3(b)(3); 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)
Continuous Operation: COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A COMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR Section 64.7(c); 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; 40 CFR Section 64.7(a);
Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years. The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.	Minn. R. 7017.1170, subp. 1
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
TRS CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting 04/16/2009. (See "Exclusion of Applicability" above)	Minn. R. 7017.1170, subp. 1(B); Minn R. 7007.0800, subp. 2
CEMS Cylinder Gas Audit (CGA): Due before the end of each calendar half-year following Permit Issuance. Except that a CGA is not required during any calendar half year in which a RATA was performed.	Minn. R. 7017.1170, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

TRS CEMS Cylinder Gas Audit (CGA): due before end of each calendar year starting at permit issuance. If a RATA is performed during the calendar year a CGA is not required. Follow the procedures in 40 CFR pt. 60, Appendix F. (See "Exclusion of Applicability" above)	Minn. R. 7017.1170, subp. 1(A); Minn R. 7007.0800, subp. 2
Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar half-year following Cylinder Gas Audit.	Minn. R. 7017.1180, subp. 1
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting at permit issuance. 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
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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.	40 CFR Section 64.3(b)(3); Minn. R. 7017.1170, subp. 2
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR Section 64.7(c); 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.	40 CFR Section 64.9(b); Minn. R. 7017.1130
ALTERNATIVE FUELS TESTING	hdr
Test burns shall consist of up to two phases - feasibility and performance testing. If an alternative biomass fuel meets feasibility requirements (as defined by the Permittee) such that it may be proposed as an additional fuel, the Permittee may move into the performance testing phase.	Minn. R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Restrictions: Feasibility test burns for any alternative biomass fuel shall be limited to no more than 168 hours of operation using the fuel, and a test period not to exceed 30 days. Performance tests for any alternative biomass fuel shall be limited to no more than 168 additional hours of operation using the proposed fuel and a test period not to exceed 60 additional days.	Minn. R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Authorization: The Permittee is authorized to conduct operational test burns of the following biomass fuels: BLS Soap Tall Oil, Wastewater Treatment Residual, Glycerin or glycerol, herbs, nuts; vegetable oils; crop field residue or field processing residues; shells, husks, seeds, dust, screenings and other agricultural processing residues; cultivated grasses or grass by products and leaves. Acceptable biomass fuels do not include wood that has been painted or pressure treated; peat; off-site generated waste oil, farm chemicals, pesticide containers, demolition waste except wood, waste from farms from an open dump, tire derived fuels, non-agricultural industrial process wastes except wood derived wastes or any material meeting the definition of a hazardous waste.	Minn R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Requirements and Restrictions: Operational test burn will include, but not be limited to, nitrogen oxide, carbon monoxide, and opacity emission limits monitored by existing CEMs and COMs. Alternative biomass fuels will further be limited to less than 5,000 tons. Alternative test fuels will be limited to less than 25 percent of the heat input capacity of the boiler. Feasibility test burns will be monitored for NOx, CO, TRS, and opacity. If feasibility test burns prove successful, then PM, PM-10, SO2 and VOC performance test data will be gathered during the performance testing phase. Preliminary fuel testing will be completed to estimate the maximum HAP emissions (HCl and Hg).	Minn R. 7007.0800, subp. 2
Alternative Biomass Fuel Emission Testing Notification and submittals; Pretest meeting: due 7 days before Performance Test Test Report: Due 45 days after Performance Test Test Report: CD copy due 105 days after Performance Test The Notification, the test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018	Minn R. 7017.2030, subp. 1-4; Minn R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 340 Lime Kiln

Associated Items: CE 340 Centrifugal Collector - Medium Efficiency

CE 341 Wet Scrubber-High Efficiency w/o Lime

GP 340 LVHC NCG Incineration and Venting

GP 420 Boilers & Recovery furnace - NOx cap

MR 327 Lime Kiln O2 monitor

MR 340 Lime Kiln Liquid Flow Rate

MR 341 Lime Kiln H2O Pressure

MR 903 TRS Monitor

SV 340 Lime Kiln

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 12.7 lbs/hour .	Title I Condition: 40 CFR Section 52.21 (netting and modeling); Minn. R. 7007.3000 (Limit approved by the EPA in a Letter dated September 29, 2008)
Total Particulate Matter: less than or equal to 0.066 grains/dry standard cubic foot @10% oxygen. This is equivalent to the NSPS subp. BB of 0.066 gr/dscf @10% oxygen, which also applies. Total Particulate Matter in this situation is defined as Particulate matter (PM) in 40 CFR Section 63.861, meaning total particulate matter as measured by EPA.	40 CFR Section 63.862(a)(ii); 40 CFR Section 63.865; Minn. R. 7011.7700(B); 40 CFR Section 63.861 (Limit approved by the EPA in a Letter dated September 29, 2008)
Particulate Matter < 10 micron: less than or equal to 12.7 lbs/hour .	Title I Condition: 40 CFR Section 52.21 (netting and modeling); Minn. R. 7007.3000 (Limit approved by the EPA in a Letter dated September 29, 2008)
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 198 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 (calcium oxide or lime) production rate in units of tons/day shall be maintained.	40 CFR Section 63.867(c)(2)
POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<p>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.</p>	<p>40 CFR Section 64.7(a); 40 CFR Section 63.864(e); 40 CFR Section 60.284(b)(2)(i); Minn. R. 7011.2450</p>
<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 +/- 5 percent of the design rate. Alternative monitoring parameters may be used with prior approval from the EPA Administrator.</p>	<p>40 CFR Section 64.7(a); 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 64.7(a); 40 CFR Section 63.864(e)(10) & (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 64.3(a); 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. 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>40 CFR Section 64.3(a); 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>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. 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>40 CFR Section 64.3(a); 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>After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Lime Kiln Scrubber accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.</p>	<p>40 CFR Section 63.864(k)(2)(iii) and 63.864(k)(3)</p>
<p>Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall follow the facility O&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>On-going compliance provisions. Lime kiln units are required to implement corrective action, when any 3-hour average parameter value is outside the range of values established in paragraph (j) of this section.</p>	<p>40 CFR 63.864 (k)(1)(ii)</p>
<p>SSM Excess Emissions Report: Report any/all excess emissions quarterly within 30 days following the end of the calendar quarter. The report must contain the required elements specified in 40 CFR Section 63.10(c). Reporting excess emissions below the violation thresholds of 63.864(k) does not constitute a violation of the Subpart MM standard. When no excess emissions have occurred, the Permittee shall submit a semi-annual report stating that no excess emissions have occurred during the reporting period. Subpart MM excess emission reports may be combined with Subpart S semi-annual excess emission reports.</p>	<p>40 CFR Section 63.867(c), and (c)(1), and (c)(2)</p>
<p>TESTING REQUIREMENTS</p>	<p>hdr</p>
<p>Performance Test: due before end of each 36 months starting 11/06/2008 to measure Total Particulate Matter. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1; 40 CFR Section 63.865</p>
<p>Performance Test: due before end of each 36 months starting 11/06/2006 to measure Particulate Matter <10 micron emissions. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.</p>	<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1; 40 CFR Section 63.865</p>
<p>Performance Test: due before end of each 60 months starting 09/05/2007 to measure Nitrogen Oxides emissions. The next test is due September 5, 2012, 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>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Performance Test: due before end of each 60 months starting 09/05/2007 to measure Sulfur Dioxide. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 09/05/2007 to measure Volatile Organic Compounds. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 09/05/2007 to measure Carbon Monoxide emissions. The next test is due September 5, 2012, then every 60 months (5 years) 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 Total Reduced Sulfur emissions, and either Oxygen or Carbon Dioxide.	Title I Condition: Monitoring associated with Title I emission limits; 40 CFR Section 60.284; Minn. R. 7017.1006; 40 CFR Section 64.7(a);
Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years. The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.	Minn. R. 7017.1170, subp. 1
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 at permit issuance. Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required. (See "Exclusion of Applicability" above)	Minn. R. 7017.1170, subp. 1(A); Minn R. 7007.0800, subp. 2
CEMS Relative Accuracy Test Audit (RATA): due before end of each 60 months starting 11/01/2010. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F. (See "Exclusion of Applicability" above)	Minn. R. 7017.1170, subp. 1(B); Minn R. 7007.0800, subp. 2
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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.	40 CFR Section 64.3(b)(3); Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1; 40 CFR Section 64.7(c);
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.	40 CFR Section 64.9(b); 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 the most recent MPCA approved 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 - 011

Subject Item: EU 420 Boiler #1

Associated Items: CE 420 Other

GP 340 LVHC NCG Incineration and Venting

GP 420 Boilers & Recovery furnace - NOx cap

MR 420 Boiler 1 NOx CEM

MR 421 Boiler 1 O2 CEM

SV 420 #1 Boiler Stack

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.60 lbs/million Btu heat input <The potential to emit from the unit is 0.008 lb/MMBtu>	Title I Condition: 40 CFR Section 52.21 (modeling and netting); Minn. R. 7011.0510, subp. 1
PM < 10 micron: less than or equal to 0.60 lbs/million Btu heat input <The potential to emit from the unit is 0.006 lb/MMBtu>	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 0.20 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
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 at permit issuance. 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 at permit issuance. 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
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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
Excess Emissions/Downtime Reports (EER's): due 30 days after end of each calendar quarter starting at permit issuance (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.	Minn. R. 7017.1110, subp. 1 & 2
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-29

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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
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TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 430 Boiler #2

- Associated Items:** CE 430 Centrifugal Collector - Medium Efficiency
 CE 431 Electrostatic Precipitator - High Efficiency
 GP 340 LVHC NCG Incineration and Venting
 GP 420 Boilers & Recovery furnace - NOx cap
 MR 430 Boiler 2 NOX & SO2 CEM
 MR 431 Boiler 2 O2 CEM
 MR 432 Boiler 2 Opacity COM
 MR 433 Boiler 2 Airflow Meter
 MR 904 Boiler 2 CO CEM
 SV 430 #2 Boiler Stack (Bypass Stack)
 SV 431 #2 Boiler Stack

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 except for one six-minute period per hour of not more than 27 percent opacity	Minn. R. 7011.0515 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 39.7 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. 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.	Minn. R. 7017.2025, subp. 3
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Total Particulate Matter. The next test is due August 8, 2010, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Particulate Matter <10 micron emissions. The next test is due August 8, 2010, then every 60 months (5 years) thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, 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;40 CFR Section 64.7(a)
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 at permit issuance. 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.	40 CFR Section 64.3(b)(3); 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.	40 CFR Section 64.3(b)(3); 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
Continuous Operation: COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A COMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1; 40 CFR Section 64.7(c);
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; 40 CFR Section 64.7(a);
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 at permit issuance. 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 at permit issuance. 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
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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.	40 CFR Section 64.3(b)(3); Minn. R. 7017.1170, subp. 2
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	Minn. R. 7017.1090, subp. 1; 40 CFR Section 64.7(c);

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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.	40 CFR Section 64.9(b); Minn. R. 7017.1130
ALTERNATIVE FUELS TESTING	hdr
Test burns shall consist of up to two phases - feasibility and performance testing. If an alternative biomass fuel meets feasibility requirements (as defined by the Permittee) such that it may be proposed as an additional fuel, the Permittee may move into the performance testing phase.	Minn. R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Restrictions: Feasibility test burns for any alternative biomass fuel shall be limited to no more than 168 hours of operation using the fuel, and a test period not to exceed 30 days. Performance tests for any alternative biomass fuel shall be limited to no more than 168 additional hours of operation using the proposed fuel and a test period not to exceed 60 additional days.	Minn. R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Authorization: The Permittee is authorized to conduct operational test burns of the following biomass fuels: BLS Soap, BLS Soap Tall Oil, Wastewater Treatment Residual, Glycerin or glycerol, herbs, nuts; vegetable oils; crop field residue or field processing residues; shells, husks, seeds, dust, screenings and other agricultural processing residues; cultivated grasses or grass by products and leaves. Acceptable biomass fuels do not include wood that has been painted or pressure treated; peat; off-site generated waste oil, farm chemicals, pesticide containers, demolition waste except wood, waste from farms from an open dump, tire derived fuels, non-agricultural industrial process wastes except wood derived wastes or any material meeting the definition of a hazardous waste.	Minn R. 7007.0800, subp. 2
Alternative Biomass Fuel Testing Requirements and Restrictions: Operational test burn will include, but not be limited to, nitrogen oxide, sulfur dioxide, carbon monoxide, and opacity emission limits monitored by existing CEMs and COMs. Alternative biomass fuels will further be limited to less than 5,000 tons and no more than 7 days (or 168 hours) operation using the fuel, and a testing period to last no more than 30 operational days beginning the first day fuel is used. Further alternative test fuels will be limited to less than 25 percent of the heat input capacity of the boiler (i.e., less than 25% of 395 mmBTU/hr or 99 mmBTU/hr). Operational test burns will be monitored for NOx, CO, SO2, and opacity. If operational test burns prove successful, then PM, PM-10 and VOC performance test data will be gathered during the test. Preliminary fuel testing will be completed to estimate the maximum HAP emissions (HCl and Hg).	Minn R. 7007.0800, subp. 2
Alternative Biomass Fuel Emission Testing Notification and submittals; Pretest meeting: due 7 days before Performance Test Test Report: Due 45 days after Performance Test Test Report: CD copy due 105 days after Performance Test The Notification, the test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018	Minn R. 7017.2030, subp. 1-4; Minn R. 7017.2018 and Minn. R. 7017.2035, subp. 1-2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 440 Boiler #3

Associated Items: CE 440 Other

GP 420 Boilers & Recovery furnace - NOx cap

MR 440 Boiler 3 NOX CEM

MR 441 Boiler 3 O2 CEM

SV 440 #3 Boiler Stack

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 <The potential to emit from the unit is 0.008 lb/MMBtu>	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
PM < 10 micron: less than or equal to 0.003 lbs/million Btu heat input <The potential to emit from the unit is 0.006 lb/MMBtu>	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 , except for one six-minute period per hour of not more than 27 percent opacity	Minn. R. 7011.0515 subp. 2
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
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 1,095 days after Permit Issuance to measure Particulate Matter emisison. <Verify compliance with limit and that the potential to emit from the unit is less than or equal to 0.008 lb/MMBtu>	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due 1,095 days after Permit Issuance to measure PM10 emissions. <Verify compliance with limit and that the potential to emit from the unit is less than or equal to 0.006 lb/MMBtu>	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 64.7(a); 40 CFR Section 60.45(a); Minn. R. 7017.1006

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-34

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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 at permit issuance 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 at permit issuance. 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
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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.	40 CFR Section 64.3(b)(3) Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F, section 3
Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1; 40 CFR Section 64.7(c);
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.	40 CFR Section 64.9(b); 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 - 011

Subject Item: EU 450 Boiler #8

- Associated Items:** CE 450 Other
- GP 420 Boilers & Recovery furnace - NOx cap
- MR 450 Boiler 8 NOX CEM
- MR 451 Boiler 8 O2 CEM
- SV 450 #8 Boiler Stack

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 <The potential to emit from the unit is 0.008 lb/MMBtu>	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
PM < 10 micron: less than or equal to 0.003 lbs/million Btu heat input <The potential to emit from the unit is 0.006 lb/MMBtu>	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 , except for one six-minute period per hour of not more than 27 percent opacity	Minn. R. 7011.05150 subp. 2
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
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. 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
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
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<p>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years.</p> <p>The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</p>	<p>Minn. R. 7017.1170, subp. 1</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 at permit issuance. Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required. (See "Exclusion of Applicability" above)</p>	<p>Minn. R. 7017.1170, subp. 1(A); Minn R. 7007.0800, subp. 2</p>
<p>CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting at permit issuance. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F. Not required if emission unit is not operational during the calendar year. (See "Exclusion of Applicability" above)</p>	<p>Minn. R. 7017.1170, subp. 1(B); Minn R. 7007.0800, subp. 2</p>
<p>Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .</p>	<p>Minn. R. 7017.1180, subp. 2</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>
<p>Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.</p>	<p>40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1</p>
<p>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.</p>	<p>Minn. R. 7017.1130; 40 CFR 60.7(f)</p>
<p>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.</p>	<p>40 CFR 60.7(b)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 460 Boiler #9

Associated Items: CE 460 Other

GP 420 Boilers & Recovery furnace - NOx cap

MR 460 Boiler 9 NOX CEM

MR 461 Boiler 9 O2 CEM

SV 460 #9 Boiler Stack

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 <The potential to emit from the unit is 0.008 lb/MMBtu>	Title I Condition: 40 CFR Section 52.21 (netting, modeling); Minn. R. 7007.3000
PM < 10 micron: less than or equal to 0.003 lbs/million Btu heat input <The potential to emit from the unit is 0.006 lb/MMBtu>	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 , except for one six-minute period per hour of not more than 27 percent opacity	Minn. R. 7011.05150 subp. 2
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
TESTING REQUIREMENTS	hdr
Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.	Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, 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
<p>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years.</p> <p>The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</p>	Minn. R. 7017.1170, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

<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 at permit issuance. Follow the procedures in 40 CFR pt. 60, Appendix F. If a RATA is performed during the calendar year, a CGA is not required. (See "Exclusion of Applicability" above)</p>	<p>Minn. R. 7017.1170, subp. 1(A); Minn R. 7007.0800, subp. 2</p>
<p>CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar 60 months starting at permit issuance. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F. (See "Exclusion of Applicability" above)</p>	<p>Minn. R. 7017.1170, subp. 1(B); Minn R. 7007.0800, subp. 2</p>
<p>Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .</p>	<p>Minn. R. 7017.1180, subp. 2</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>
<p>Excess Emissions/Downtime Reports (EER's): due 30 days after end of each calendar quarter starting at permit issuance (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.</p>	<p>40 CFR 60.7(c); Minn. R. 7017.1110, subp. 1 & 2</p>
<p>Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.</p>	<p>40 CFR 60.13(e); Minn. R. 7017.1090, subp. 1</p>
<p>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.</p>	<p>Minn. R. 7017.1130; 40 CFR 60.7(f)</p>
<p>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.</p>	<p>40 CFR 60.7(b)</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: EU 530 No. 4 Paper Machine

- Associated Items:** GP 422 Paper Machines
- SV 511 Wall Exhaust Vent
 - SV 512 Wall Exhaust Vent
 - SV 513 Wall Exhaust Vent
 - SV 514 Penthouse Exhaust Vent
 - SV 515 Penthouse Exhaust Vent
 - SV 516 Base Mill Exhaust Vents
 - SV 517 Outside Pocket Vent
 - SV 518 Penthouse Exhaust Vent
 - SV 519 Penthouse Exhaust Vent
 - SV 524 Vacuum Pumps (No. 3 & 4 PM) (BM)
 - SV 525 North Exhaust Vent Between #3 & 4 PM's
 - SV 530 Exhaust Vent North of #4 penthouse
 - SV 531 #4 P.M. - #1 Exhaust Vent
 - SV 532 #4 P.M. - #2 Exhaust Vent
 - SV 533 #4 P.M. - #3 Exhaust Vent
 - SV 534 #4 P.M. - #4 Exhaust Vent
 - SV 535 No. 4 PM Coater Dryer Exhaust
 - SV 536 #4 PM Heat Recovery North Exhaust Vent
 - SV 537 Exhaust Vent North of #4 penthouse

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. 7011.0610, 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-40

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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

What to do	Why to do it
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-41

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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

SV 902 Paint Booth Exhaust

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: 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 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 - 011

Subject Item: EU 903 Sludge Dryer

Associated Items: CE 904 Other

CE 905 Venturi Scrubber

CE 906 Spray Tower

SV 420 #1 Boiler Stack

SV 430 #2 Boiler Stack (Bypass Stack)

SV 431 #2 Boiler Stack

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: The plan shall identify corrective 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
<p>POLLUTION CONTROL EQUIPMENT REQUIREMENT (CE 905: Venturi Scrubber and CE 906: Spray Tower) The following requirements apply when the facility is not burning stack gas in boiler #1 or boiler #2</p>	hdr
The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. The Permittee shall document periods of operation of the control equipment and the periods that the bypass valve (213-ZS-062) directs stack gas from the control equipment to the atmosphere rather than directing the stack gas for combustion in boilers #1 (EU 420) and #2 (EU 430).	Minn. R. 7007.0800, subp. 2 and 14
CE 905: VENTURI SCRUBBER	hdr
Liquid Flow Rate: greater than or equal to 70 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Downtime of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.	Minn. R. 7017.2025, subp. 3
Pressure Drop: greater than or equal to 2.0 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.	Minn. R. 7017.2025, subp. 3
CE 906: SPRAY TOWER	hdr
Liquid Flow Rate: greater than or equal to 788 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Downtime of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.	Minn. R. 7017.2025, subp. 3
Pressure Drop: greater than or equal to 0.5 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.	Minn. R. 7017.2025, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-43

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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: Distillate Diesel fuel oil (No.1 or 2) 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 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

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

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

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: CE 320 Electrostatic Precipitator - High Efficiency

Associated Items: EU 320 Recovery Furnace

GP 423 HVLC NCG Incineration and Venting

What to do	Why to do it
Operation and Maintenance of ESP: The Permittee shall operate and maintain the ESP in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and review by MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
ESP monitoring: The COMS for the emission unit shall be used to assess proper operation of this ESP.	40 CFR Section 64.7(a); Minn. R. 7007.0800, subp. 2; Minn. R. 7017.0200
Continuous Monitoring: The Permittee shall continuously, or at a minimum once every 15 minutes, monitor the opacity of the ESP exhaust.	40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017. 0200
Monitoring Equipment: The necessary monitoring equipment must be installed, in use, and properly maintained, including maintaining the necessary parts for routine repairs of the monitoring equipment, whenever operation of the monitored control equipment is required.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Periodic Inspections: At least once per calendar quarter, or more frequently if required by the manufacturer, the Permittee shall externally inspect the control equipment components that are subject to wear or plugging. The permittee shall also internally inspect the control equipment components that are subject to wear or plugging on an annual basis, or more frequently if required by the manufacturer. The Permittee shall maintain a written record of the inspections and any corrective actions taken resulting from the inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspections: At least once per calendar year, or more frequently if required by the manufacturer, the Permittee shall inspect the control equipment components not covered by the quarterly inspections. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the monitored opacity exceeds the indicator range as established in the O & M Plan; or - the ESP or any of its components are found during the inspections to need repair. Corrective actions shall return operation to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the ESP. The Permittee shall keep a record of the type and date of any corrective action taken for the ESP.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provided an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing opacity which is considered an excursion, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring changes.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: CE 431 Electrostatic Precipitator - High Efficiency

Associated Items: EU 430 Boiler #2

What to do	Why to do it
Operation and Maintenance of ESP: The Permittee shall operate and maintain the ESP in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and review by MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
ESP monitoring: The COMS for the emission unit shall be used to assess proper operation of this ESP.	40 CFR Section 64.7(a); Minn. R. 7007.0800, subp. 2; Minn. R. 7017.0200
Continuous Monitoring: The Permittee shall continuously, or at a minimum once every 15 minutes, monitor the opacity of the ESP exhaust.	40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017. 0200
Monitoring Equipment: The necessary monitoring equipment must be installed, in use, and properly maintained, including maintaining the necessary parts for routine repairs of the monitoring equipment, whenever operation of the monitored control equipment is required.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Periodic Inspections: At least once per calendar quarter, or more frequently if required by the manufacturer, the Permittee shall externally inspect the control equipment components that are subject to wear or plugging. The permittee shall also internally inspect the control equipment components that are subject to wear or plugging on an annual basis, or more frequently if required by the manufacturer. The Permittee shall maintain a written record of the inspections and any corrective actions taken resulting from the inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspections: At least once per calendar year, or more frequently if required by the manufacturer, the Permittee shall inspect the control equipment components not covered by the quarterly inspections. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the monitored opacity exceeds the indicator range as established in the O & M Plan; or - the ESP or any of its components are found during the inspections to need repair. Corrective actions shall return operation to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the ESP. The Permittee shall keep a record of the type and date of any corrective action taken for the ESP.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provided an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing opacity which is considered an excursion, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring changes.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-47

01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Subject Item: FS 904 Intermediate Chip Booster Station (Blower with cyclone)

What to do	Why to do it
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 01/21/10

Facility Name: Boise White Paper LLC - Intl Falls
Permit Number: 07100002 - 011

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.

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

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.

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

Send 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 by the Acid Rain Program to:

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

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

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Performance Test Plan	due 30 days before Performance Test (Alternative Biomass Fuel Emission Testing submittal) of the operational and emission testing of a biomass fuel (emission testing will be conducted only if operational testing has been proven feasible), the permittee shall submit a written performance test notification and test plan. The test plan shall include (1) the type(s) and estimated amount of biomass to be tested, (2) operating parameters and anticipated fuel mixes during the emission testing of the boiler to be tested, (3) air pollutants that will be monitored (ie., PM, PM-10, and VOC), and (4) a testing schedule.	EU320, EU430
Submittal	due 270 days after Permit Issuance, the facility shall submit revised applicability determinations for all previous permitting actions, starting with Permit Action 004, using corrected emissions calculations to ensure compliance with all applicable standards.	Total Facility

TABLE B: RECURRENT SUBMITTALS

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

What to send	When to send	Portion of Facility Affected
Ambient Air Monitoring Report	due 45 days after end of each calendar quarter following Permit Issuance. 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
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which the CGA was completed, except that a CGA is not required during any calendar half year in which a RATA was performed. A CGA shall be conducted according to the procedures in 40 CFR pt. 60, Appendix F, section 5.1.2. If the monitored emission unit was operated for less than 24 hours during the calendar half year, a CGA is not required for that calendar half year.	MR323, MR327, MR450, MR451, MR460, MR461, MR903
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which the CGA was completed, except that a CGA is not required during any calendar half year in which a RATA was performed. The CGAs shall be conducted at least three months apart but no more than eight months apart. A CGA shall be conducted according to the procedures in 40 CFR pt. 60, Appendix F, section 5.1.2. If the monitored emission unit was operated for less than 24 hours during the calendar half year, a CGA is not required for that calendar half year.	MR322, MR324, MR325, MR420, MR421, MR430, MR431, MR904
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance, except that a CGA is not required during any calendar quarter in which a RATA was performed.	MR440, MR441
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Permit Issuance. 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 EER must be submitted even if there were no excess emissions, downtime or bypasses during the quarter.	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which a RATA was completed.	MR322, MR323, MR324, MR325, MR327, MR420, MR421, MR430, MR431, MR440, MR441, MR450, MR451, MR460, MR461, MR903, MR904
Compliance Status Report	due 30 days after end of each calendar half-year following Permit Issuance, 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 Permit Issuance in which a COMS error audit was completed.	MR320
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar half-year following Permit Issuance in which a COMS Error Audit was completed.	MR432
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility

TABLE B: RECURRENT SUBMITTALS

B-4 01/21/10

Facility Name: Boise White Paper LLC - Intl Falls

Permit Number: 07100002 - 011

Annual Report	due 30 days after end of each calendar year following Permit Issuance. 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 following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the 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
Report	due 30 days after end of each calendar year following Permit Issuance. Report annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of NCG (LVHC) oxidized in Boiler #1 and #2 and of NCG (LVHC) venting.	GP340

APPENDIX C – Insignificant Activities

Facility Name: Boise White Paper LLC – International Falls

Permit Number: 07100002-011

Insignificant Activities Required to be Listed

LOCATION	EMISSION UNIT	REFERENCES
BLEACHING AREA		
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
POWER BOILERS		
Outside Bldg. 10 ¹	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
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
CHEMICAL RECOVERY AREA		
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 ²	Fresh Lime Silo	7011.0065, Subpart 1 (A)

¹ These sources are insignificant by the Control Equipment Rule

² These sources are insignificant by the Control Equipment Rule

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
	PULPING	
Bldg. 24 ²	#1 Wood Chip Cyclone	7011.0065, Subpart 1 (A)
Bldg. 24 ²	#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 ²	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
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	Quaternary 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
	WASTEWATER COLLECTION & TREATMENT	
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 ₂ 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 ₂ Plant	O ₂ 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 Vents (3)	7007.1300 , Subpart 4
Bldg 40	Water Filtration Plant	7007.1300 , Subpart 4
	PAPER MACHINE AREAS	
Bldg. 93	#1 Sheeter Bldg.	7007.1300 , Subpart 4
Outside Bldg. 6B ³	#1 Size Press Base Mill Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 6B ³	#1 Wet End Base Mill Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 30 ³	#2 Size Press I-1 Starch Silo	7011.0065, Subpart 1 (A)
Outside Bldg. 30 ³	#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

³ These sources are insignificant by the Control Equipment Rule

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
	PAPER MACHINE AREAS	
Bldg. 4	No.2 PM Cycle Tanks (2) - HW & SW	7007.1300 , Subpart 4
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(3)
Bldg. 4	Wet End Slurry Tank (2)	7007.1300 , Subpart 4
	WOODYARD	
Woodyard	Bark Hog	7007.1300 , Subpart 4

Woodyard ⁴	Blower Feed Screen #1	7011.0065, Subpart 1 (A)
Woodyard ⁴	Blower Feed Screen #2	7011.0065, Subpart 1 (A)
Woodyard ⁴	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
	MISCELLANEOUS SOURCES	
Instrument Shop	Blasting booth	7007.1300 , Subpart 4
Bldg. 39	Blueprint Machine	7007.1300, Subpart 3.H.4
Bldg. 39	Blueprint Machine	7007.1300, Subpart 3.H.4
M,D & W	Chemical Storage Area	7007.1300 , Subpart 4
MA Mort, O'Leary, Fagen	Contractor Welding Areas (3)	7007.1300, Subpart 3.H(3)
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
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)
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(3)
M,D & W	Space Heaters #2	7007.1300, Subpart 3.A
Finishing/Shipping Shop	Welding #7	7007.1300, Subpart 3.H(3)
Garage	Welding #1	7007.1300, Subpart 3.H(3)
Base Mill Pipe	Welding #2	7007.1300, Subpart 3.H(3)
Power & Recovery Shop	Welding #3	7007.1300, Subpart 3.H(3)
Base Mill Mill Right Shop	Welding #6	7007.1300, Subpart 3.H(3)
No. 1 PM Mill Right	Welding #9	7007.1300, Subpart 3.H(3)
Base Mill Machine Shop	Welding areas (2) #4	7007.1300, Subpart 3.H(3)
Pulp Mill Shop	Welding areas (3) #5	7007.1300, Subpart 3.H(3)
M,D & W	Welding areas (4) #10	7007.1300, Subpart 3.H(3)
Training Shop	Welding areas (4) #8	7007.1300, Subpart 3.H(3)
Base Mill Pipe	Welding Rod Oven	7007.1300, Subpart 3.H(3)
Instrument Shop	Wood working machinery	7007.1300 , Subpart 4

⁴ These sources are insignificant by the Control Equipment Rule

Insignificant Activities and Applicable Requirements

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

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane.	Minn. R. 7011.0510/0515
3(B)	Furnaces, boilers, and incinerators:	
	1. infrared electric ovens; and	Minn. R. 7011.0710/0715
3(G)	Emissions from a laboratory, as defined in the subpart.	Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
3(H)	Miscellaneous:	
	3. brazing, soldering or welding equipment;	Minn. R. 7011.0510/.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715
	4. blueprint copiers and photographic processes;	Minn. R. 7011.0105/0110

Insignificant Activities Required to Be Listed for Part 70 sources

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
4	Individual emissions units at a stationary source, each of which has: A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide; B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and	Varies by equipment.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
	C. For hazardous air pollutants, emissions units with: (1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or (2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart.	

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

Facility Name: Boise White Paper LLC – International Falls

Permit Number: 07100002-011

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.

APPENDIX E – Modeling Parameters

Facility Name: Boise White Paper LLC – International Falls

Permit Number: 07100002-011

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 07100002-011

This technical support document (TSD) 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 preliminary 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 nd Street International Falls Koochiching County
Contact: David Reimer Phone: 218-285-5170	Kirby Dahlquist 218-285-5264

1.2 Facility Description

Boise White 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.

1.3 Description of any Changes Allowed with this Permit Issuance

This permit action is for the reissuance of the facility's Part 70 permit. This reissuance updates facility description data, results from performance testing and represents the facility's current operating conditions.

1.4 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit

Permit Number and Issuance Date	Action Authorized
07100002-010 March 24, 2009	This Major Amendment was requested by the facility to allow for the blending of distillate oil (#1 and #2) with the BLS to provide the facility with additional fuel flexibility for the Recovery Furnace (Emission Unit 320). The distillate oil (#1 and #2) is blended with the BLS at a maximum rate of 30 gallons of distillate oil per hour (4.2 Million Btu/hr). The distillate oil blending results in a heat input change of less than 1 percent. The blending occurs upstream of the recovery furnace. There will be no physical change to the furnace as the blending will occur upstream of the furnace and the maximum firing capacity of the furnace will not be exceeded nor will the existing permit limits.
07100002-009 October 15, 2008	This Major Amendment was requested by the facility to allow for the testing of alternative biomass fuels in Boiler No. 2 (EU 430) and the Recovery Furnace (EU Unit 320) and to increase the Total Facility black liquor solids (BLS) production limit while administratively incorporating updates to the facility's performance testing and opacity requirements. In addition, the facility is requesting to increase the Particulate Matter (PM)/PM ₁₀ emission limits for the Smelt Dissolving Tank (SV 322) and the Lime Kiln (SV 340) while decreasing the PM/PM ₁₀ emission limits from the Recovery Furnace (SV 320) by an equivalent amount.
07100002-008 May 05, 2008	Permit action (07100002-008) was a minor amendment to the existing Part 70 operating permit to install an emergency diesel generator (EU 908). Also included in this minor amendment was a NESHAP notification related to an off-machine coater (EU 909) that incorporated Subpart JJJJ into the permit. Emission Units 303, 305 and 307 were removed from GP340. The boiler plate language of the permit was updated since the last amendment (-007).
07100002-007 October 13, 2005	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.
07100002-006 November 15, 2004	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 ₂ 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 Semichemical Pulp Mills; incorporated changes necessary due to performance tests; and incorporated ownership change from Boise Cascade to Boise Paper LLC.

07100002-005 November 07, 2002	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 (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 (SO ₂) limit on the brownstock washer and for installation of the No. 3 rotary debarker.
07100002-004 August 10, 2001	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.
07100002-003 October 02, 2000	<p>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.</p> <p>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.</p>
07100002-002 Not issued	The permit application for this permitting action was for a major amendment for two trailer-mounted package boilers and one trailer-mounted generator. The MPCA did not require a permit for this equipment since they were temporary sources to be used as insurance for Y2K and a one-time event. The MPCA requested a notification describing the purpose and timing associated with this project as well as information on the size of the equipment and the fuel that will be used. The facility was also requested to provide notification once the equipment was shipped off-site.
07100002-001 September 09, 1999	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.

1.5 Facility Emissions:

Table 2. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ Tpy	PM _{2.5} tpy	SO ₂ tpy	NO _x tpy	CO tpy	Lead tpy	VOC tpy	TRS tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	548	359	271	446	1,530	3,855	0.08	732	68	61	228
Total Facility Actual Emissions (2008)	78	102	32	80	840	1,990	0.06	199	TRS and HAPs not reported in emission inventory		

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.

Part 70 Permit Program

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

New Source Performance Standards (NSPS)

The recovery furnace, lime kiln, smelt dissolving tank, brown stock washers, and NCG incineration group are subject to 40 CFR pt. 60, subpart BB. Boilers 3, 8, and 9 are subject to 40 CFR pt. 60, subpart Db.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is a major source of HAPs. There are no new standards applicable to the operations at this facility. The facility is subject to the following NESHAPs:

- 40 CFR pt. 63, Subp. S Pulp & Paper (non-combustion) MACT I and (non-chemical) MACT III
- 40 CFR pt. 63, Subp. MM Pulp & Paper (chemical recovery combustion) MACT II
- 40 CFR pt. 63, Subp. JJJJ—National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating

Compliance Assurance Monitoring (CAM)

The table below lists the sources which are subject to CAM, whether the source is a large pollutant specific emission unit (PSEU), and the monitoring for the applicable pollutants.

Table 4. CAM Summary

Unit	Control	CAM Applicability	Pollutant	Monitoring
EU320	CE320 ESP	Large	PM/PM ₁₀	COMS, 6-minute average
EU322	CE322 Venturi Scrubber	Large	PM/PM ₁₀	Scrubber flow and differential pressure. > 81 gpm & 10" H2O column, using 3-hr Block Average or as determined during the most recent performance test.
EU 340	CE 341 Wet Scrubber – High Efficiency	Large	PM/PM ₁₀	Scrubber flow and supply pressure > 425 gpm & 308 psi, using 3-hr Block Average or as determined during the most recent performance test.
EU430	CE431 ESP	Large	PM/PM ₁₀	COMS, 6-minute average
EU430	CE430 Methane DeNox <i>(not Needed to meet limit)</i>	Large	NO _x	CEMs is an existing Title V permit requirement NO _x 30 day rolling average.
EU440	CE440 - Flue Gas Recirculation	Large	NO _x	CEMs is an existing Title V permit requirement. NO _x 30 day rolling average.

For large pollutant specific emission units, records of the monitored parameter must be made at a minimum of 4 times per hour, or once every 15 minutes. For other PSEUs (not large), records must be made at a minimum of once per 24 hours. See the CAM Plan submitted by the applicant in the attached.

Minnesota State Rules

The facility is subject to the following standards:

- Minn. R. 7011.0150 Standards for Preventing Particulate Matter from Becoming Airborne
- Minn. R. 7011.0510 Standards of Performance for Existing Indirect Heating Equipment
- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment
- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines
- Minn. R. 7011.2450 Standards of Performance for New Kraft Pulp Mills
- Minn. R. 7011.7385 Emission Standards for Paper and Other Web Coating
- Minn. R. 7011.7700 Emission Standards for Pulp and Paper Production
- Minn. R. 7011.8150 Emission Standards for Paper and Other Web Coating

Table 4. Regulatory Overview of Facility

Level	Applicable Regulations	Comments:
EU 440; EU 450; EU 460	40 CFR pt. 60, subp. Db	Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
GP 340; SV 322; EU 320; EU 340	40 CFR pt. 60, subp. BB 40 CFR pt. 63, subp. MM	Standards of Performance for Kraft Pulp Mills
Throughout	40 CFR § 52.21	Prevention of Significant Deterioration. BACT limits set for NO _x , VOCs, TRS. Limits set for PM, PM ₁₀ , SO ₂ due to modeling and netting.
EU 902	40 CFR § 52.21	Prevention of Significant Deterioration. Limit taken to avoid classification as major modification
EU 420; EU 430	Minn. R. 7011.0510	Standards of Performance for New Indirect Heating Equipment
SV 327; EU 902	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment
GP 420	40 CFR § 52.21	Cap limit for NO _x for combustion units (i.e. boilers and recovery furnace). Total NO _x cap includes combustion units as well as the lime kiln and smelt dissolving tank. Limit was set due to visibility concerns for Class I area.

GP 422	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment
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SV 220, SV 240		Limits for toxics (chlorine, chlorine dioxide, chloroform) set due to risk assessment performed for EAW for 1989 permit
GP 340; GP 421; GP 423; SV 173; SV 220; SV 240; EU 174	40 CFR pt. 63, subp. S	National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
EU320, SV322, EU340	40 CFR pt. 63, subp. MM	National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

Regulatory Overview of Units Affected by this Permitting Action^{1,2}

Total Facility, EU, GP, or SV	Applicable Regulations	Comments/Justication for change:
Total Facility	Minn. R. 7007.0800, subp. 2	CD-01 line 14 - Redundant information with line below <i>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.</i>
	Minn. R. 7007.0800, subp. 2	CD-01 line 20 – Provides safe amount of time to shut down operations without risking safety.
	40 CFR § 63.440	CD-01 line 32 – Compliance date met - <i>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.</i>
	Minn. R. 7017.1110, subp. 1 & 2	Add Excess Emission Report statement - <u><i>Excess Emissions/Downtime Reports (EER's): due 30 days after end of each calendar quarter following Permit Issuance. 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 EER must be submitted even if there were no excess emissions, downtime or bypasses during the quarter.</i></u>
GP 340 (LVHC NCG Incineratio	NA	Added text in description and clarified associated items.

n and Venting)		
GP 421 (Kraft Pulping Process Condensates)	40 CFR § 63.446(c)(3)	<u>Added condensate collection as CD-01 line 1.0- <i>HAPs - Total: greater than or equal to 11.1 lbs/ton. Condensate collection is based on a 14-day average (11.1 lbs of HAP per ton of ODP). The pulping process condensates from equipment systems listed shall in total contain a total HAP mass of 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of ODP for mills that perform bleaching. For purposes of complying with the kraft pulping condensate requirements in 40 CFR §63.446, the facility chooses to measure the total HAP concentration as methanol (see 40 CFR §63.457(g))</i></u>
	40 CFR § 63.446(e)(2),(3), and (5)	<u>Modified Condensate Treatment to match federal rule requirements CD-01 line 2.0- <i>Condensate Treatment - HAPs: Regulated condensates shall be hardpiped to the UNOX closed biological treatment system. The UNOX treatment system shall be operated in a manner that treats the collected condensate according to one or more of the following methods: - Discharge the pulping process condensate below the liquid surface of the UNOX biological treatment system and treat the pulping process condensates - Treated to reduce or destroy the total HAPs by 92% or more by weight; or - Treated by removing 10.2 lbs/ton of ODP or achieving a total HAP concentration of 330 ppm or less by weight at the outlet of the control device.</i></u>
GP 423 (HVLC NCG Incineration and Venting)	NA	Added SV 173 and EU 360 to associated items
	NA	Changed Subpart M to Subpart S in the header as appropriate
	40 CFR § 63.443	<u>Added compliance text – <i>Periods of excess emissions reported under 40 CFR §63.455 shall not be a violation of 40 CFR §63.443 (c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed four percent for control devices used to reduce the total HAP emissions from the HVLC system</i></u>
	40 CFR § 63.443(c)	<u>Added compliance text – <i>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 §63.450 and as described in the total facility section. (Applies to EU 173 and EU 175)</i></u>
	40 CFR § 63.443; 40 CFR § 63.447	<u>CD-01 line 2 – Compliance date met - <i>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.</i></u>

SV 173 (Brown Stock Decker)	NA	Changed name to Brownstock <i>Decker</i> as the Brownstock Washer is collected by the HVLC system since 2006.
	40 CFR § 60.283(a)(1)(iv); Minn. R. 7011.2450	CD-01 line 6 – Compliance met with HVLC system - 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 § 63.440(d)	CD-01 line 7 – Compliance date met - 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 § 63.453	CD-01 line 9 – CMS not applicable to this system - 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 §63.453.
	40 CFR § 63.443(c)	CD-01 line 10 – Enclosures do not apply to the decker as the washers are collected by the HVLC system - 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 §63.450 and as described in the total facility section.
	Title I Condition: Testing associated with Title I emission limit; Minn. R. 7017.2020, subp. 1	CD-01 line 12 – Testing no longer required as Brown stock washers are collected by HVLC system - Performance Test: due before 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	CD-01 line 13 – Testing no longer required as Brown stock washers are collected by HVLC system - 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.
SV 220 (ClO2 Generator)	Minn. R. 7017.2020, subp. 1	CD-01 line 11 – MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits - Performance Test: due before end of each 60 months starting 08/08/2010 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.
SV 240 (Bleach plant)	40 CFR § 63.457(a); Minn. R. 7017.2020, subp. 1	CD-01 line 18 – MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits -Performance Test: due before end of each 60 months starting 08/08/2010 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
SV 322 (Smelt Dissolving Tank)	NA	Deleted associated items EU 323 and EU 324 as they are voluntarily collected as part of the HVLC system for odor control and no longer part of SV 322.
	Title I Condition: 40 CFR § 52.21 (modeling and netting); Minn. R. 7007.3000 (PENDING-USEPA-APPROVAL) (Limit approved in a letter dated September 29, 2008)	CD-01 line 2 – Inserted <u>“(Limit approved in a letter dated September 29, 2008)”</u>
	Title I Condition: 40 CFR § 52.21 (modeling and netting); Minn. R. 7007.3000 (This requirement remains applicable unless superseded by the above limit through USEPA approval)	CD-01 line 3 – deleted - 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 §60.282(a)(2)) and MACT limit (40 CFR §63.862(a)(1)(i)(B)) of 0.2 lb/ton BLS for a smelt dissolving tank).
	Title I Condition: 40 CFR § 52.21 (modeling and netting); Minn. R. 7007.3000 (PENDING-USEPA-APPROVAL) (Limit approved in a letter dated September 29, 2008)	CD-01 line 4 – Inserted <u>“(Limit approved in a letter dated September 29, 2008)”</u>

<p>Title I Condition: 40 CFR §52.21 (modeling and netting); Minn. R. 7007.3000 (This requirement remains applicable unless superceded by the above limit through USEPA approval)</p>	<p>CD-01 line 5 – deleted - Particulate Matter < 10 micron: less than or equal to 5.7 lbs/hour</p>
<p>40 CFR § 63.864(e);</p>	<p>CD-01 line 15 – made permit language consistent with requirements to include flow meter rather than pressure measurement – 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. <u>Install, calibrate, maintain, and operate a monitoring device for the continuous measurement (at least once every 15 minutes) of the scrubbing liquid flow rate. The monitoring device is to be certified by the manufacturer to be accurate within +/- 5 percent of design rate. The monitoring device shall be operational upon startup of the control equipment.</u></p>
<p>40 CFR § <u>63.864(k)(2)(iii)</u> and <u>63.864(k)(3)</u></p>	<p>Added MACT compliance determination language – <u>After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR § 63.862 if the Smelt Dissolving Tank Vent accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.</u></p>
<p>40 CFR § <u>63.864</u> <u>(k)(1)(i)</u></p>	<p>Added MACT compliance determination language – <u>On-going compliance provisions. Smelt Dissolving Tank units are required to implement corrective action, when any 3-hour average parameter value is outside the range of values established in paragraph (j) of this section.</u></p>
<p>40 CFR- §63.7(a)(2); 40- CFR §63.865(b)(1)</p>	<p>CD-01 line 21 – deleted Initial performance test information previously completed - 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 §63.7 and 63.865. This initial performance test has been completed.</p>
<p>Title I Condition:</p>	<p>CD-01 line 22 – Separated TRS and Particulate Matter < 10 micron</p>

<p>Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1; 40 CFR § 63.865(b)(1)</p>	<p>pollutant parameters into separate lines. MPCA review of Performance Test historical data indicates further testing at 60 month interval warranted – Performance Test: due before end of each 36 months starting 10/27/2004 to measure Particulate Matter < 10-micron and Total Reduced Sulfur (TRS) emissions. The next test is due October 27, 2009, then every 36 months thereafter. <u>Performance Test: due before end of each 60 months starting 09/12/2006 to measure Particulate Matter < 10 micron emissions. The next test is due September 12, 2011, then every 60 months thereafter.</u> – and - <u>Performance Test: due before end of each 60 months starting 09/12/2006 to Total Reduced Sulfur (TRS) emissions. The next test is due September 12, 2011, then every 60 months thereafter.</u></p>	
<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>	<p>CD-01 line 23 – Separated Total Particulate Matter, Opacity, Volatile Organic Compound and Nitrogen Oxides emissions pollutant parameters into separate lines. MPCA review of Performance Test historical data indicates further testing at 60 month interval warranted for Total Particulate Matter; no further testing requirements Opacity, Volatile Organic Compound and Nitrogen Oxides to meet emission limits - 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, 2009, then every 36 months (3 years) thereafter. And <u>Performance Test: due before end of each 60 months starting 09/12/2006 to measure Total Particulate Matter emissions. The next test is due September 12, 2011, then every 60 months (5 years) thereafter.</u></p>	
<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1</p>	<p>CD-01 line 24 – MPCA review of Performance Test historical data indicates Sulfur dioxide testing no longer warranted to meet emission limits - Performance Test: due before end of each 60 months starting 09/12/2006 to measure Sulfur Dioxide emissions. The next test is due September 12, 2011, then every 60 months (5 years) thereafter.</p>	
<p>SV 903 (Combined SV220 and SV240 (ClO2 Generator & Bleach Plant)</p>	<p>NA</p>	<p>Added associated items for combined stack SV 220 and SV 240</p>
<p>EU 174 (Brown Stock</p>	<p>NA</p>	<p>Added EU174 that was previously tied into the brownstock washer system EU 173. This was separated due to the addition or the HVLC system that collects EU 173.</p>

Decker)		
	40 CFR § 63.443(a)(iv)(B)	Added MACT compliance language <u>HAPs - Total: less than or equal to 400 parts per million by weight (process water). (For purposes of complying with this requirement the facility chooses to measure the total HAP concentration as methanol, see 40 CFR § 63.457(f)(2)) For purposes of complying with the kraft pulping condensate requirements in 40 CFR § 63.446, the owner or operator shall measure the total HAP concentration as methanol (see 40 CFR § 63.457(f)(2))</u>
	Minn. R. 7017.2025, subp. 3	Added MACT compliance language <u>Performance Test: due before end of each 60 months following Permit Issuance. Test to verify that process water is less than or equal to the total HAP concentration of 400 parts per million by weight.</u>
EU 320 (recovery furnace)	Title I Condition: 40 CFR § 52.21(j) (BACT limit); 40 CFR § 63.864(c)(2)(i); 40 CFR § 60.282(a)(i); Minn. R. 7007.3000 (PENDING-USEPA-APPROVAL) (Limit approved in a letter dated September 29, 2008)	CD-01 line 2 – Inserted –“(Limit approved in a letter dated September 29, 2008)”
	Title I Condition: 40 CFR § 52.21(j) (BACT limit); 40 CFR § 63.864(c)(2)(i); 40 CFR § 60.282(a)(i); Minn. R. 7007.3000 (This requirement remains applicable unless superceded by the above limit through USEPA approval)	CD-01 line 3 – deleted - 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 § 52.21(j) (BACT limit); Minn. R. 7007.3000 (PENDING-	CD-01 line 4 – Inserted –“(Limit approved in a letter dated September 29, 2008)”

USEPA- APPROVAL) (Limit approved in a letter dated September 29, 2008)	
Title I Condition:- 40 CFR §52.21(j)- (BACT limit);- Minn. R. 7007.3000 (This requirement remains applicable unless superceded by the above limit through USEPA approval)	CD-01 line 5 – deleted –Particulate Matter <10 micron: less than or equal to 22.9 lbs/hour
40 CFR § 60.284	Added NSPS compliance language <u>The Administrator will not consider periods of excess emissions to be indicative of a violation provided that the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed six percent for average opacities from recovery furnaces.</u>
40 CFR § 63.864 (k)(2)(ii)	Added MACT compliance language <u>The Recovery Furnace is in violation of the standards of 63.862 if the opacity is greater than 20 percent for 6 percent or more of the operating time within any quarterly period;</u>
40 CFR § 60.284	Added NSPS compliance language <u>The Administrator will not consider periods of excess emissions reported under paragraph (d) of this §to be indicative of a violation provided that the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed one percent for TRS emissions from recovery furnaces.</u>
40 CFR- §63.865(b)(1);- Minn. R.- 7017.2020, subp. 1	CD-01 line 27 – deleted Initial performance test information previously completed – 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 §63.7 and 63.865. This test was completed October 2003.
Minn. R. 7017.2020, subp. 1; 40 CFR § 63.865(b)(1)	CD-01 line 27 – separated pollutant parameters into separate lines. MPCA review of Performance Test historical data indicates further testing at 60 month interval warranted for Total Particulate Matter and Particulate Matter < 10 microns; no further testing requirements

	<p>for sulfur dioxide to meet emission limits: Performance Test: due before end of each 60 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, 2011, then every 60 months (5 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. <u>Performance Test: due before end of each 60 months starting 09/13/2006 to measure Total Particulate Matter emissions. The next test is due September 13, 2011, then every 60 months (5 years) thereafter. and</u> <u>Performance Test: due before end of each 60 months starting 09/13/2006 to measure Particulate Matter < 10 microns. The next test is due September 13, 2011, then every 60 months (5 years) thereafter.</u></p>
<p>Title I Condition: Testing associated with Title I emission limit; Minn. R. 7017.2020, subp. 1</p>	<p>CD-01 line 28 – MPCA review of Performance Test historical data indicates no further testing requirements for VOC to meet emission limits: 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, 2011, then every 60 months (5 years) thereafter.</p>
<p>40 CFR § 63.867(c), (c)(1), and (c)(2)</p>	<p>Added MACT compliance language</p> <p><u>SSM Excess Emissions Report: Report any/all excess emissions quarterly within 30 days following the end of the calendar quarterly. The report must contain the required elements specified in 40 CFR § 63.10(c). Reporting excess emissions below the violation thresholds of 63.864(k) does not constitute a violation of the Subpart MM standard. When no excess emissions have occurred, the Permittee shall submit a semi-annual report stating that no excess emissions have occurred during the reporting period. Subpart MM excess emission reports may be combined with Subpart S semi-annual excess emission reports.</u></p>
<p>40 CFR § 63.864 (k)(1)(i)</p>	<p>Added MACT compliance language</p> <p><u>On-going compliance provisions. Recovery Furnace units are required to implement corrective action if the monitoring exceedances, when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity.</u></p>
<p>Minn. R. 7017.1170, subp. 1</p>	<p>Added Exclusion of applicability statement for CGAs and RATAs completed at less frequent intervals</p> <p><u>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of</u></p>

		<p><u>one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years.</u></p> <p><u>The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</u></p>
	<p>40 CFR- §63.867(c)Minn. R. 7017.1110, subp. 1- & 2</p>	<p>CD-01 line 51 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking 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 §63.10(e).</p>
EU 340 (Lime Kiln)	NA	Clarified Monitors identified in associated items
	<p>Title I Condition: 40 CFR § 52.21 (netting and modeling); Minn. R. 7007.3000 (PENDING- USEPA- APPROVAL) (Limit approved by the EPA in a Letter dated September 29, 2008)</p>	<p>CD-01 line 2 – Inserted <u>“(Limit approved by the EPA in a Letter dated September 29, 2008)”</u></p>
	<p>Title I Condition: 40 CFR §52.21 (netting and modeling); Minn. R. 7007.3000 (This requirement remains applicable unless superceded by the above limit through USEPA approval)</p>	<p>CD-01 line 3 – deleted obsolete limit due to EPA approval letter Total Particulate Matter: less than or equal to 10.6 lbs/hour</p>
	<p>40 CFR- §63.862(a)(ii); 40-</p>	<p>CD-01 line 4 – Inserted <u>“(Limit approved by the EPA in a Letter dated September 29, 2008)”</u></p>

<p>CFR §63.865; Minn. R. 7011.7700(B) (PENDING USEPA APPROVAL) 40 CFR § 63.862(a)(ii); 40 CFR §63.865; Minn. R. 7011.7700(B); 40 CFR § 63.861 (Limit approved by the EPA in a Letter dated September 29, 2008)</p>	
<p>40 CFR- §63.862(a)(i)(e); 40 CFR §63.862(a)(ii); 40 CFR §63.865; Minn. R. 7011.7700(B) (This requirement remains applicable unless superceded by the above limit through USEPA approval)</p>	<p>CD-01 line 5 – deleted obsolete limit due to EPA approval letter 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.</p>
<p>Title I Condition: 40 CFR § 52.21 (netting and modeling); Minn. R. 7007.3000 (PENDING USEPA APPROVAL) (Limit approved by the EPA in a Letter dated September 29, 2008)</p>	<p>CD-01 line 6 – Inserted –“(<u>Limit approved by the EPA in a Letter dated September 29, 2008</u>)”</p>
<p>Title I Condition:- 40 CFR §52.21- (netting and modeling); Minn.- R. 7007.3000 (This-</p>	<p>CD-01 line 7 – deleted obsolete limit due to EPA approval letter Particulate Matter < 10 micron: less than or equal to 10.6 lbs/hour</p>

<p>requirement remains applicable unless superseded by the above limit through USEPA approval)</p>	
<p>Minn. R. 7017.2025, subp. 3</p>	<p>CD-01 line 16 – changed production limit based on most recent stack testing</p> <p>Production: less than or equal to 207.9 <u>198</u> 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.</p>
<p><u>40 CFR § 63.864(k)(2)(iii) and 63.864(k)(3)</u></p>	<p>Added MACT compliance text <u>After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR § 63.862 if the Lime Kiln Scrubber accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.</u></p>
<p><u>40 CFR § 63.864(k)(1)(ii)</u></p>	<p>Added MACT compliance text <u>On-going compliance provisions. Lime kiln units are required to implement corrective action, when any 3-hour average parameter value is outside the range of values established in paragraph (j) of this section.</u></p>
<p><u>40 CFR § 63.867(c), and (c)(1), and (c)(2)</u></p>	<p>Added MACT compliance text <u>SSM Excess Emissions Report: Report any/all excess emissions quarterly within 30 days following the end of the calendar quarter. The report must contain the required elements specified in 40 CFR § 63.10(c). Reporting excess emissions below the violation thresholds of 63.864(k) does not constitute a violation of the Subpart MM standard. When no excess emissions have occurred, the Permittee shall submit a semi-annual report stating that no excess emissions have occurred during the reporting period. Subpart MM excess emission reports may be combined with Subpart S semi-annual excess emission reports.</u></p>
<p>Title I Condition: Testing associated with Title I emission limits; Minn. R. 7017.2020, subp. 1 <u>40</u></p>	<p>CD-01 Line 27 - separated pollutant parameters into separate lines and added MACT citation. MPCA review of Performance Test historical data indicates further testing at 36 month interval warranted for Total Particulate Matter and Particulate Matter < 10 microns: Performance Test: due before end of each year starting 08/08/2001 to measure Total Particulate Matter and Particulate Matter <10 micron emissions. The next test is due February 2, 2009, then every year (12-</p>

	<u>CFR § 63.865</u>	months) thereafter. <u>Performance Test: due before end of each 36 months starting 11/06/2008 to measure Total Particulate Matter. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.</u> And <u>Performance Test: due before end of each 36 months starting 11/06/2006 to measure Particulate Matter <10 micron emissions. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.</u>
	40 CFR- §63.865(b)(1); Minn. R. 7017.2020, subp. 1	CD-01 line 28 – deleted initial Performance test previously completed 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 §63.7 and 63.865. This test was completed on 08/31/2004.
	40 CFR 60.7(e); Minn. R. 7017.1110, subp. 1 & 2	CD-01 line 39 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking 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.
	<u>Minn. R. 7017.1170, subp. 1</u>	Added Exclusion of applicability statement for CGAs and RATAs completed at less frequent intervals <u>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years. The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</u>
EU 420 (#1 Boiler)	40 CFR §63, Subpart DDDDD	CD-01 Line 8 deleted vacated Boiler MACT language The Permittee shall comply with all applicable portions of 40 CFR §63, Subpart DDDDD, by September 13, 2007.
EU 430 (#2 Boiler)	40 CFR §63, Subpart DDDDD	CD-01 Line 16 deleted vacated Boiler MACT language The Permittee shall comply with all applicable portions of 40 CFR §63, Subpart DDDDD, by September 13, 2007.
	Minn. R. 7017.1110, subp. 1	CD-01 line 24 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking

& 2	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 §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.
Minn. R. 7017.1220	CD-01 line 26 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking COMS Calibration Error Audit Results Summary: due 30 days after end of each calendar half year following COMS Calibration Error Audit.
Minn. R. 7017.1180, subp. 1	CD-01 line 35 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar half year following Cylinder Gas Audit.
Minn. R. 7017.1180, subp. 3	CD-01 line 38 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).
Minn. R. 7017.1110, subp. 1 & 2	CD-01 line 40 Deleted Redundant language 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
Minn R. 7007.0800, subp. 2	CD-01 line 47 Corrected permit language Alternative Biomass Fuel Testing Requirements and Restrictions: Operational test burn will include, but not be limited to, nitrogen oxide, sulfur dioxide, carbon monoxide, and opacity emission limits monitored by existing CEMs and COMs. Alternative biomass fuels will further be limited to less than 5,000 tons and no more than 7 days (or 168 hours) operation using the fuel, and a testing period to last no more than 30 operational days beginning the first day fuel is used. Further alternative test fuels will be limited to less than 25 percent of the heat input capacity of the boiler (i.e., less than 25% of 395-mmBTU/hr or 99 mmBTU/hr). Operational test burns will be monitored for NOx, CO, SO2, and opacity. If operational test burns prove successful, then PM, PM-10 and VOC performance test data will be gathered during the test. Preliminary fuel testing will be completed to estimate the maximum HAP emissions (HCl and Hg).

EU 440 (#3 Boiler)	40 CFR §63, Subpart DDDDD	CD-01 Line 13 deleted vacated Boiler MACT language The Permittee shall comply with all applicable portions of 40 CFR §63, Subpart DDDDD, by September 13, 2007.
	Minn. R. 7017.1180, subp. 1	CD-01 line 20 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar quarter following Cylinder Gas Audit.
	Minn. R. 7017.1180, subp. 3	CD-01 line 23 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).
	40 CFR 60.7(c); Minn. R. 7017.1110, subp. 1 & 2	CD-01 line 25 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking 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.
EU 450 (#8 Boiler)	40 CFR §63, Subpart DDDDD	CD-01 Line 14 deleted vacated Boiler MACT language The Permittee shall comply with all applicable portions of 40 CFR §63, Subpart DDDDD, by September 13, 2007.
	Minn. R. 7017.1170, subp. 1	Added Exclusion of applicability statement for CGAs and RATAs completed at less frequent intervals <u>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years. The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</u>
	Minn. R. 7017.1180, subp. 1	CD-01 line 21 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar quarter following Cylinder Gas Audit.
	Minn. R. 7017.1180, subp. 3	CD-01 line 24 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar year following CEMS Relative

		Accuracy Test Audit (RATA)-
	40 CFR 60.7(c); Minn. R. 7017.1110, subp. 1 & 2	CD-01 line 26 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking 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.
EU 450 (#9 Boiler)	40 CFR §63, Subpart DDDDD	CD-01 Line 13 deleted vacated Boiler MACT language The Permittee shall comply with all applicable portions of 40 CFR §63, Subpart DDDDD, by September 13, 2007.
		Added Exclusion of applicability statement for CGAs and RATAs completed at less frequent intervals <u>Exclusion of Applicability: If the actual emissions of the emission unit are less than ten tons/year or if the emission unit operates less than 120 hours per quarter, the facility shall conduct a minimum of one cylinder gas audit annually, except during calendar years in which a relative accuracy test audit (RATA) is performed and conduct a minimum of one RATA every five calendar years. The owner or operator of a CEMS that has utilized an exclusion under this subpart shall submit notification with the following quarterly excess emissions report, in the event that the conditions which made the CEMS eligible for the exclusion no longer apply. No exclusion under this subpart affects the obligation to comply with similar quality assurance provisions imposed under other applicable requirements or compliance documents.</u>
	Minn. R. 7017.1170, subp. 1	
	Minn. R. 7017.1180, subp. 1	CD-01 line 21 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar quarter following Cylinder Gas Audit.
	Minn. R. 7017.1180, subp. 3	CD-01 line 24 Deleted Redundant language that was added into MR §to ease MPCA compliance tracking Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).
EU 903 (Sludge Dryer)	hdr	Added permit language for Pollution control equipment CD-01 Line 5 <u>POLLUTION CONTROL EQUIPMENT REQUIREMENT (CE 905: Venturi Scrubber and CE 906: Spray Tower)</u> <u>The following requirements apply when the facility is not burning stack gas in boiler #1 or boiler #2</u>
	Minn. R. 7007.0800, subp. 2 and 14	Added permit language for Pollution control equipment CD-01 Line 6 <u>The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control</u>

	equipment is vented directly to the atmosphere. The Permittee shall document periods of operation of the control equipment and the periods that the bypass valve (213-ZS-062) directs stack gas from the control equipment to the atmosphere rather than directing the stack gas for combustion in boilers #1 (EU 420) and #2 (EU 430).
<u>hdr</u>	Added permit language for Pollution control equipment CD-01 Line 7 <u>CE 905: VENTURI SCRUBBER</u>
<u>Minn. R.</u> <u>7017.2025, subp. 3</u>	Added permit language for Pollution control equipment CD-01 Line 8 <u>Liquid Flow Rate: greater than or equal to 70 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Down time of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.</u>
<u>Minn. R.</u> <u>7017.2025, subp. 3</u>	Added permit language for Pollution control equipment CD-01 Line 9 <u>Pressure Drop: greater than or equal to 2.0 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.</u>
<u>hdr</u>	Added permit language for Pollution control equipment CD-01 Line 10 <u>CE 906: SPRAY TOWER</u>
<u>Minn. R.</u> <u>7017.2025, subp. 3</u>	Added permit language for Pollution control equipment CD-01 Line 11 <u>Liquid Flow Rate: greater than or equal to 788 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Down time of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.</u>
<u>Minn. R.</u> <u>7017.2025, subp. 3</u>	Added permit language for Pollution control equipment CD-01 Line 12 <u>Pressure Drop: greater than or equal to 0.5 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.</u>

1 – New language is underlined.

2 – ~~Modified/removed language~~

3. Technical Information

Ambient Air Quality Analysis

Boise previously performed the Class II air quality analysis in three parts and considered the Boiler No. 2 project together with the efficiency improvement project. The first part of the analysis was a preliminary analysis in which project-related increases were modeled to determine which pollutants were subject to full impact analysis and to determine the area of significant impact. Second, dispersion modeling, using ISCST3, was done to compare modeled impacts to federal and state ambient air quality standards. The third part of the analysis involved modeling the change in ambient air concentrations from increment consuming sources to compare to PSD allowable increments.

The results of the preliminary analysis indicated that there was no significant impact zone for CO and therefore the CO analysis was complete. Full analysis was required for NO_x, SO₂, and PM₁₀. Modeling was also performed for H₂S, which was not triggered for PSD review, but was evaluated for compliance with the state standard. A summary of the National Ambient Air Quality Standards (NAAQS) and Minnesota Ambient Air Quality Standards (MAAQS) modeling results for NO_x, SO₂, and PM₁₀ are given below:

Pollutant	Ave. Period	Maximum Predicted Impacts (µg/m ³)		National Ambient Air Quality Standard		Minnesota Ambient Air Quality Standard	
		Conc. w/o bkgd	Conc. w/bkgd	Primary Standard (µg/m ³)	Secondary Standard (µg/m ³)	Primary Standard (µg/m ³)	Secondary Standard (µg/m ³)
NO _x	Annual	38	46	100	100	100	100
SO ₂	Annual	2	5	80	--	80	60
	24-Hour	32	45	365 ^a	--	365 ^a	365 ^a
	3-Hour	608	637	--	1300 ^a	--	915 ^a
	1-Hour	766	798	--	--	1300 ^a	--
PM ₁₀	Annual	37	47	50	50	--	--
	24-Hour	77	95	150 ^a	150 ^a	--	--
H ₂ S	½-Hour	37	38	--	--	70 ^b	--
	½-Hour	<42	<42 ^d	--	--	42 ^c	--

^a Not to be exceeded more than once per year; therefore, the maximum second-highest results are shown.

^b Not to be exceeded more than twice per year; the maximum second-highest result is shown.

^c Not to be exceeded more than twice in five consecutive days at any given receptor.

^d During the five modeled years, the 42 µg/m³ standard was never exceeded more than twice within five consecutive days at any given receptor; therefore, the standard is met.

A summary of the increment consumption results for PM₁₀, NO_x and SO₂ is given below:

Pollutant	Maximum Modeled Impact	PSD Class II Increment
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	Avg. Period	($\mu\text{g}/\text{m}^3$)	($\mu\text{g}/\text{m}^3$)
NO _x	Annual	11	25
SO ₂	Annual	2	20
	24-Hour	28	91 ^a
	3-Hour	102	512 ^a
PM ₁₀	Annual	0.12	17
	24-hour	9.4	30 ^a

^a Not to be exceeded more than once per year; therefore, the maximum second-highest results are shown.

As a result of the modeling, it was determined that none of the applicable ambient air quality standards would be violated and that none of the applicable increments established by the PSD rule would be violated.

Class I Impact Analysis

Boise also previously performed a Class I Impact Analysis. Those results are not summarized here, since the boiler project has a very small impact on the Class I areas. The primary concern in the Class I areas has been visibility concerns, mainly related to NO_x emissions. There is no increase in NO_x associated with the Boiler No. 2 project. Boise has evaluated the air quality related impacts on the Class I areas in the PSD application; the evaluation was performed with the efficiency improvement project and the Boiler No. 2 project combined.

Additional Impacts Analysis

Boise also performed an Additional Impacts Analysis. The analysis concluded that there would be no adverse impacts due to the projects.

Cluster Rule

The Cluster Rule is a multimedia rule promulgated by EPA in April 1998. The rules addresses water discharges from Kraft paper mills as well as Hazardous Air Pollutants (HAPs) emissions. The rules addressing the air emissions are the National Emission Standards for Hazardous Air Pollutants (NESHAPs) from the Pulp and Paper Industry. The NESHAPs are sometimes referred to as MACT rules since the NESHAPs establish maximum achievable control technology (MACT) for control of HAPs.

The MACT standards have been developed in three parts; MACT I and MACT III were promulgated as part of the Cluster Rule. MACT II has been proposed and was scheduled to be promulgated in the year 2000. The three parts of the MACT standards, as they apply to Kraft mills, were developed as follows:

MACT I: controls HAP emissions from pulping process;

MACT II: controls HAP emissions from the pulping chemical recovery combustion areas; and

MACT III: controls HAP emissions from papermaking systems, including bleaching.

MACT I and III were promulgated on April 15, 1998, as part of the Cluster rules. The deadline for coming into complete compliance was April 16, 2006. An intermediate deadline of April 16, 2001 existed for some requirements related to bleaching and the control of pulping process condensates and for Boise's NCG system, also referred to as a low-volume, high-concentration (LVHC) system. The deadline of 2006 applies to the high-volume, low-concentration sources, such as the brownstock washer system.

The MACT rule was written to give facilities options in how to achieve and demonstrate compliance with many of the standards within the rule.

3.2 Periodic Monitoring and CAM

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.

For CAM, the Permittee submitted a CAM proposal as required by 40 CFR § 64.3. It can be found Attached to this TSD.

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 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
Total Facility	<u>Black Liquor Solids (virgin bone dried basis) Production:</u> less than or equal to <u>44,200 tons/month using 12-month Rolling Average</u>	<u>Recordkeeping:</u> Monthly record and monthly calculation of 12-month rolling average of the black liquor solids production, by the 15th of the following month.	Records of BLS burned are kept in Proficy database. Liquor shipped offsite (if any) is added into the monthly number and records are kept on the Proficy database. <u>Reporting:</u> Annually by January 30th, a report of the previous 12 monthly 12-month rolling average calculations of the black liquor solids (virgin bone dried basis) production.
GP 340 LVHC NCG Incineration and Venting	<u>NCG (LVHC) Venting:</u> NCG (LVHC) venting (venting directly to the atmosphere, rather than being oxidized)	<u>Recordkeeping:</u> The length of each NCG (LVHC) vent to the atmosphere as tracked electronically will be	<u>Reporting:</u> Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of NCG (LVHC) venting. Semi-annually report the LVHC venting with LVHC SSM report which allows 1% venting periods which is much

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	<p>in the lime kiln or Boilers #1 or #2) shall <u>be limited to not more than 30 hours per year on a 12-month rolling sum basis.</u> NCG (LVHC) venting shall also follow procedure described under the Total Facility subject item.</p>	<p>documented in an electronic environmental incident report.</p>	<p>more than the 30 hour limit.</p>
	<p><u>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</u> from Boilers #1 and #2 together, on a 12-month rolling sum basis.</p>	<p><u>Recordkeeping:</u> Record of daily emissions and monthly record of hours during which NCG (LVHC) 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 (LVHC) oxidation. Boiler #2 SO2 emissions shall be calculated using SO2 CEMS data and boiler operating data, including hours of NCG (LVHC) oxidation.</p>	<p><u>Reporting:</u> Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of NCG (LVHC) oxidized in Boiler #1 and #2.</p>
<p>GP 420 Boilers & Recovery furnace - NOx cap</p>	<p><u>Nitrogen Oxides:</u> less than or equal to 3.67 tons/day from combustion sources (Boilers #1, #2, #3, #8, #9 and Recovery Furnace).</p>	<p><u>Calculate:</u> Calculate daily NOx emissions 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).</p>	<p>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.</p>
	<p><u>Nitrogen Oxides:</u> less than or equal to 4.18 tons/day, calculated on a semi-annual</p>	<p><u>Calculate:</u> NOx emissions from the smelt dissolving tank (EU 322) and the lime</p>	<p>The total NOx emissions shall be calculated on a semi-annual basis. Any exceedances shall be reported with the CEMS EERs.</p>

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	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.	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.	
GP 421 Kraft Pulp Process Condensates	Total: greater than or equal to 11.1 lbs/ton using Other . Other is defined as condensate collection based on a 14-day average (11.1 lbs of HAP per ton of ODP).	Recordkeeping: Records of daily condensate flows and calculations using tested emission factors are kept on the Boise Proficiency database.	The pulping process condensates from equipment systems listed shall in total contain a total HAP mass of 5.5 kilograms or more of total HAP per megagram (11.1 pounds per ton) of ODP for mills that perform bleaching. For purposes of complying with the kraft pulping condensate requirements in 40 CFR Section 63.446, the facility chooses to measure the total HAP concentration as methanol (see 40 CFR Section 63.457(g))
	Condensate Monitoring Requirements	Recordkeeping: Record of daily MLVSS is kept on the facility sewer report.	Mixed Liquor Volatile Suspended Solids (MLVSS) shall be monitored to demonstrate continuous compliance with the minimum bio-treatment requirement.
GP 422 Paper Machines	Total Particulate Matter: less than or equal to 0.3 grains/ dry standard cubic foot of exhaust gas	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.	Testing of Paper machines by NCASI has demonstrated maintenance is sufficient to meet the standard.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
GP 423 HVLC NCG Incineration and Venting	Periods of excess emissions (venting) reported under 40 CFR Section 63.455 shall not be a violation of 40 CFR Section 63.443 (c) and (d) provided that the time of excess emissions (excluding periods of startup, shutdown, or malfunction) divided by the total process operating time in a semi-annual reporting period does not exceed four percent for control devices used to reduce the total HAP emissions from the HVLC System	Recordkeeping: The length of each NCG (LVHC) vent to the atmosphere as tracked electronically will be documented in an electronic environmental incident report.	Reporting: Semi-annually report the HVLC venting with HVLC SSM report. The Facility is required to collect emissions from EU 173, EU 175 and EU 177 and chose to also include emissions from EU 303, EU 305, EU 307, EU 323, EU 324, EU 360 and EU 905. These emissions are collected and burned in EU 32 0 (Recover Furnace).
SV 173 Brown Stock Decker	Sulfur Dioxide: less than or equal to 0.02 lbs/ton air dried tons unbleached pulp.	Last Test June 2006 to obtain emission factor	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.
	Volatile Organic Compounds: less than or equal to 0.20 lbs/ton air dried tons unbleached pulp, measured as carbon excluding methane.	Last Test June 2006 to obtain emission factor	Test 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.
	Sulfur - Total Reduced: less than or equal to 0.12 lbs/ton air dried tons unbleached pulp, measured as H2S.	Last Test June 2006 to obtain emission factor	Test 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.
SV 220 ClO2 Generator SV 240 Bleach plant	Chlorine: less than or equal to 0.17 lbs/hour .	The most recent compliance test will be used as an emission factor.	This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Chlorine Dioxide: less than or equal to 2.2 lbs/hour .	The most recent compliance test will be used as an emission factor.	This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	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).	Observe and record, once per operating shift, the pressure drop of the gas stream for CE220. The pressure drop is monitored and recorded by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2.
	Liquid Flow Rate: greater than or equal to 95.7 gallons/minute or as determined during the most recent performance test (this is scrubbing liquid supply flow rate).	Recordkeeping: Liquid flow rate is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2.
	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).	The most recent compliance test will be used as an emission factor.	Completed during the Initial Performance Test
	Chlorine: less than or equal to 0.41 lbs/hour .	The most recent compliance test will be used as an emission factor.	This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Chlorine Dioxide: less than or equal to 1.2 lbs/hour .	The most recent compliance test will be used as an emission factor.	This is a state only limit and is not enforceable by the EPA Administrator and citizens under the Clean Air Act. MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Pressure Drop: greater than or equal to 4.0 inches of water column or as determined during the most recent performance test (this is pressure drop of the gas stream).	Observe and record, once per operating shift, the pressure drop of the gas stream for CE240. The pressure drop is monitored and recorded by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2.
	Liquid Flow Rate: greater than or equal to 121 gallons/minute or as determined during the most recent performance test (this is scrubbing	Recordkeeping: Liquid flow rate is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	liquid supply flow rate).		
	Scrubber pH > 11.4 based on initial performance test.	Recordkeeping: Liquid scrubber pH is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2.
SV 322 Smelt Dissolving Tank	Total Particulate Matter: less than or equal to 7.3 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).	Performance testing on a 60 month frequency based on historical test frequency results.	Limit approved by the EPA in a Letter dated September 29, 2008. Performance Test: due before end of each 60 months starting 09/12/2006 to measure Particulate Matter < 10 micron emissions. The next test is due September 12, 2011, then every 60 months thereafter.
	Particulate Matter < 10 micron: less than or equal to 7.3 lbs/hour .	Performance testing on a 60 month frequency based on historical test frequency results.	Limit approved by the EPA in a Letter dated September 29, 2008. Performance Test: due before end of each 60 months starting 09/12/2006 to measure Total Particulate Matter emissions. The next test is due September 12, 2011, then every 60 months (5 years) thereafter.
	Opacity: less than or equal to 20 percent opacity using 6-minute Average	Historical test data used for emission factor.	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Nitrogen Oxides: less than or equal to 0.033 lbs/ton of black liquor solids produced.	Historical test data used for emission factor.	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Sulfur Dioxide: less than or equal to 4.3 lbs/hour (this is equivalent to 0.090 lb/ton BLS).	Historical test data used for emission factor.	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	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)	Historical test data used for emission factor.	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	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.	Historical test data used for emission factor.	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Process Throughput: less than or equal to 1595 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.	Recordkeeping: Throughput is measured by the rate of BLS fired in the Recovery Furnace EU 320. The process throughput rate is monitored and recorded continuously by the Boise PI system	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. The Production limit located at the facility level also applies at all times.
	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.	Recordkeeping: Pressure drop is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2. After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Smelt Dissolving Tank Vent accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.
	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.	Recordkeeping: Liquid flow rate is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2. After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Smelt Dissolving Tank Vent accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.
	NOx Emissions Calculation: The NOx emissions shall be calculated on a semi-annual basis.	Most recent performance Test and Calculation.	The NOx emission factor, obtained from performance test, shall be multiplied by the production rate of the black liquor 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).
EU 174 Brown Stock Decker	HAPs - Total: less than or equal to 400 parts per million by weight (process water). Testing not required if Brown Stock Decker has been incorporated into the Closed GP 423 HVLC NCG system.	Performance Test: due before end of each 60 months following Permit Issuance. Test to verify that process water is less than or equal to the total HAP concentration of 400 parts per million by weight.	(For purposes of complying with this requirement the facility chooses to measure the total HAP concentration as methanol, see 40 CFR Section 63.457(f)(2)) For purposes of complying with the kraft pulping condensate requirements in 40 CFR Section 63.446, the owner or operator shall measure the total HAP concentration as methanol (see 40 CFR Section 63.457(f)(2)). Testing not required if Brown Stock Decker has been incorporated into the Closed GP 423 HVLC NCG system.
EU 320 Recovery Furnace	Total Particulate Matter: less than or equal to 27.0 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.	Performance Testing and record keeping	Performance Test: due before end of each 60 months starting 09/13/2006 to measure Total Particulate Matter emissions. The next test is due September 13, 2011, then every 60 months (5 years) thereafter.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Particulate Matter < 10 micron: less than or equal to 19.2 lbs/hour .	Performance Testing and record keeping	Performance Test: due before end of each 60 months starting 09/13/2006 to measure Particulate Matter < 10 microns. The next test is due September 13, 2011, then every 60 months (5 years) thereafter.
	Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one six-minute period per hour of not more than 27 percent opacity. This is more stringent than 35% opacity limit of NSPS subp. BB and MACT subp. MM, which also applies.	Emissions Monitoring: The Permittee shall use a COMS to measure Opacity emissions from EU320	COMS verifies compliance status.
	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.	Performance Testing and record keeping	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Sulfur Dioxide: less than or equal to 106.2 lbs/hour using 3-hour Average	Performance Testing and record keeping	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Nitrogen Oxides: less than or equal to 110 lbs/hour using 30-day Rolling Average . This is equivalent to 80 ppm on a dry basis, corrected to 8% oxygen.	CEM	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 538 lbs/hour using 24-hour Rolling Average . This is equivalent to 600 ppm on a dry basis, corrected to 8% oxygen.	CEM	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 2289 tons/year using 12-month Rolling Average	CEM and Recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	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	Performance Testing	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	lb/salt cake free, bone dry tons of black liquor solids).		
	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.	CEM and Recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years. The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring and recording TRS emissions. The Administrator will not consider periods of excess emissions reported under paragraph (d) of this section to be indicative of a violation provided that the percent of the total number of possible contiguous periods of excess emissions in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the facility is not operating) during which excess emissions occur does not exceed one percent for TRS emissions from recovery furnaces.
	Process Throughput: less than or equal to 1595 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.	Recordkeeping: Throughput is measured by the rate of BLS fired in the Recovery Furnace EU 320. The process throughput rate is monitored and recorded continuously by the Boise PI system	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. The Production limit located at the facility level also applies at all times.
	Process Throughput: less than or equal to 30.0 gallons/hour using 12-hour Average (calculated on a twelve-hour block average) of distillate oil (#1 or #2))	Record and calculate every 12 hours the 12 hour block average of distillate process throughput, in gallons/hour, of distillate oil that was burned in the recovery furnace to verify that the distillate process throughput was less than or equal to 30.0 gallons/hour using a 12-hour Block Average. Records shall be maintained for 5 years.	The process throughput rate is monitored and recorded continuously by the Boise PI system
	Sulfur Content of Fuel: less than or equal to 0.05 percent by weight distillate oil sulfur content. The potential to emit from the allowable fuel is 0.051 lb/MMBtu.	Fuel Supplier Documentation: The Permittee shall obtain and maintain fuel supplier documentation for each shipment of fuel distillate oil (#1 and #2), documenting that the sulfur content does not exceed 0.05% by weight.	Purchasing keeps vendor records.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
		Records shall be maintained for 5 years.	
EU 340 Lime Kiln	Total Particulate Matter: less than or equal to 12.7 lbs/hour .	Performance Testing	Performance Test: due before end of each 36 months starting 11/06/2008 to measure Total Particulate Matter. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.
	Total Particulate Matter: less than or equal to 0.066 grains/dry standard cubic foot @10% oxygen. This is equivalent to the NSPS subp. BB of 0.066 gr/dscf @10% oxygen, which also applies. Total Particulate Matter in this situation is defined as Particulate matter (PM) in 40 CFR Section 63.861, meaning total particulate matter as measured by EPA.	Initial Performance Test completed previously.	Initial Performance Test completed previously.
	Particulate Matter < 10 micron: less than or equal to 12.7 lbs/hour .	Performance Testing	Performance Test: due before end of each 36 months starting 11/06/2006 to measure Particulate Matter <10 micron emissions. The next test is due November 6, 2011, then every 3 years (36 months) thereafter.
	Opacity: less than or equal to 20 percent opacity using 6-minute Average	Performance Testing	MPCA review of Performance Test historical data indicates further testing not warranted in order to meet emission limits due to historical low results.
	Sulfur Dioxide: less than or equal to 13.5 lbs/hour	CEM	Performance Test: due before end of each 60 months starting 09/05/2007 to measure Sulfur Dioxide. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.
	Nitrogen Oxides: less than or equal to 34.9 lbs/hour using 3-hour Average	Performance Testing	Performance Test: due before end of each 60 months starting 09/05/2007 to measure Nitrogen Oxides emissions. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.
	Carbon Monoxide: less than or equal to 23.7 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 09/05/2007 to measure Carbon Monoxide emissions. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.
	Volatile Organic Compounds: less than or equal to 11.4 lbs/hour , measured as C excluding methane.	Performance Testing	Performance Test: due before end of each 60 months starting 09/05/2007 to measure Volatile Organic Compounds. The next test is due September 5, 2012, then every 60 months (5 years) thereafter.
	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.	CEM	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Production: less than or equal to 198 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 process throughput rate is monitored, calculated and recorded continuously by the Boise PI system. Recordkeeping: records of the CaO (calcium oxide or lime) production rate in units of tons/day shall be maintained.	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.
	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.	Recordkeeping: Pressure is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2. After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Lime Kiln Scrubber accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.
	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.	Recordkeeping: Liquid flow rate is monitored and recorded continuously by the Boise PI system	Deviations are to be reported on the semi-annual DRF-2. After completion of the Initial Performance test, the Permittee is in violation of the Subpart MM Standards of 40 CFR Section 63.862 if the Lime Kiln Scrubber accumulates 6 or more 3-hour operating parameter exceedances within any 6-month calendar reporting period. For purposes of determining the number of monitoring exceedances, no more than one exceedance shall be attributed in any given 24-hour period.
	NOx Emissions Calculation: The NOx emissions shall be calculated on a semi-annual basis.	Most recent performance Test and Calculation.	The NOx emission factor, obtained from performance test, shall be multiplied by the production rate of lime kiln (CaO). 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).
EU 420 Boiler #1	Total Particulate Matter: less than or equal to 0.60 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Particulate Matter < 10 micron: less than or equal to 0.60 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Opacity: less than or equal to 20 percent opacity, except for one six-minute period per hour of not more than 60 percent Opacity.	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Nitrogen Oxides: less than or equal to 0.20 lbs/million Btu heat input using 30-day Rolling Average	CEM	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
EU 430 Boiler #2	Total Particulate Matter: less than or equal to 13.0 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Total Particulate Matter. The next test is due August 8, 2010, then every 60 months (5 years) thereafter.
	Particulate Matter < 10 micron: less than or equal to 11.7 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Particulate Matter <10 micron emissions. The next test is due August 8, 2010, then every 60 months (5 years) thereafter.
	Opacity: less than or equal to 20 percent opacity using 6-minute Average except for one six-minute period per hour of not more than 27 percent opacity	ESP Monitoring: The COMS for this emission unit shall be used to assess proper operation of this ESP.	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.
	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.	CEM and recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	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.	CEM and recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Nitrogen Oxides: less than or equal to 100.2 lbs/hour using 30-day Rolling Average	CEM and recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 800 lbs/hour using 1-Hour Average	CEM and recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 200 lbs/hour using 12-month Rolling Average	CEM and recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Volatile Organic Compounds: less than or equal to 40.2 lbs/hour measured as C excluding methane.	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months (5 years) thereafter.
	Fuel Usage: less than or equal to 27010 tons/month using 12-month Rolling Average .	The process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	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. Bark usage is measured based on steam generation calculations, primary sludge is measured by weigh belts, and secondary sludge .

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Fuel Usage: less than or equal to 5193 tons/month using 12-month Rolling Average (SLUDGE USAGE LIMIT).	The process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	The sludge limit is limited to pulp and paper mill wastewater generated sludge.
	Fuel Usage: less than or equal to 39.7 tons/hour of total bark/wood refuse/sludge, calculated on a six-hour block average.	Performance Testing Throughput or Historical testing	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.
EU 440 Boiler #3	Total Particulate Matter: less than or equal to 0.003 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one six-minute period per hour of not more than 27 percent opacity	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	CEM and Recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input or Carbon Monoxide: less than or equal to 33.6 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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).	Performance Testing	Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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 process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	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.
EU 450 Boiler #8	Total Particulate Matter: less than or equal to	Gas fired boiler	Testing not warranted for Natural Gas boiler

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	0.003 lbs/million Btu heat input		
	Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one six-minute period per hour of not more than 27 percent opacity	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	CEM and Recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input or Carbon Monoxide: less than or equal to 33.6 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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).	Performance Testing	Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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 process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	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.
	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.	The process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	Performance Testing sets limit
EU 460 Boiler #9	Total Particulate Matter: less than or equal to	Gas fired boiler	Testing not warranted for Natural Gas boiler

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	0.003 lbs/million Btu heat input		
	Particulate Matter < 10 micron: less than or equal to 0.003 lbs/million Btu heat input	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one six-minute period per hour of not more than 27 percent opacity	Gas fired boiler	Testing not warranted for Natural Gas boiler
	Nitrogen Oxides: less than or equal to 0.050 lbs/million Btu heat input using 30-day Rolling Average	CEM and Recordkeeping	Monitor uptime and excess emissions results reported on quarterly DRF-1. Data collected on CEM Data acquisition system and retained for at least 5 years.
	Carbon Monoxide: less than or equal to 0.090 lbs/million Btu heat input or Carbon Monoxide: less than or equal to 33.6 lbs/hour	Performance Testing	Performance Test: due before end of each 60 months starting 08/08/2010 to measure Carbon Monoxide emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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).	Performance Testing	Performance Test: due before end of each calendar 60 months starting 08/08/2010 to measure Volatile Organic Compounds emissions. The next test is due August 8, 2010, then every 60 months thereafter.
	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 process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.	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.
EU 530 No. 4 Paper Machine	Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas	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.	Testing of Paper machines by NCASI has demonstrated maintenance is sufficient to meet the standard.
	Opacity: less than or equal to 20 percent opacity ; except for one six-minute period per hour of not more than 60 percent opacity.	Natural Gas fired system	Opacity testing not warranted on natural gas fired equipment.
EU 602	Wastewater Process	Recordkeeping: Monthly	Reporting: Annually by January 30th, a report of the

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
Wastewater Treatment Plant Cooling Tower	Throughput: less than or equal to 1700E6 gallons/year using 12-month Rolling Sum	wastewater processed rate and monthly calculation of 12-month rolling sum, by the 15th of the following month.	previous 12 monthly 12-month rolling sum calculations of wastewater throughput. The process throughput rate is monitored, calculated and recorded continuously by the Boise PI system.
EU 902 Paint Spray Booth	Operating Hours: less than or equal to 1044 hours/year using 12-month Rolling Sum	Recordkeeping: Monthly record of operating hours and monthly calculation of 12-month rolling sum, by the 15th of the following month.	Reporting: Annually by January 30th, a report of the previous 12 monthly 12-month rolling sum calculations of spray booth operation.
	Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas	Maintenance – replace filter in accordance with Manufacturers guidance	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.
	Opacity: less than or equal to 20 percent opacity using 6-minute Average	Maintenance – replace filter in accordance with Manufacturers guidance	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.
EU 903 Sludge Dryer	Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas	Historical Performance Testing	Most recent testing in April 2006. The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere.
	Opacity: less than or equal to 20 percent opacity	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere.	Most recent testing in April 2006. The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere.
	Control Equipment Monitoring: Observe and record once per operating day, the liquid flow rate and pressure drop for CE 905 and CE 906.	The process control equipment data is monitored, calculated and recorded continuously by the Boise PI system.	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. The Permittee shall document periods of operation of the control equipment and the periods that the bypass valve (213-ZS-062) directs stack gas from the control equipment to the atmosphere rather than directing the stack gas for combustion in boilers #1 (EU 420) and #2 (EU 430).

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Liquid Flow Rate: greater than or equal to 70 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Down time of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.	Historical Performance Testing	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. Monitoring and recording information stored in Pi, a data acquisition system.
	Pressure Drop: greater than or equal to 2.0 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.	Historical Performance Testing	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. Monitoring and recording information stored in Pi, a data acquisition system.
	Liquid Flow Rate: greater than or equal to 788 gallons/minute using 3-hour Block Average : Divide total flow by total operating time in each three hour-block. Down time of 15 or more minutes is not to be included as operating time. Readings taken by continuous monitor at one minute increments.	Historical Performance Testing	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. Monitoring and recording information stored in Pi, a data acquisition system.

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
	Pressure Drop: greater than or equal to 0.5 inches of water column using 3-hour Block Average or as determined during the most recent performance test. 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.	Historical Performance Testing	The Permittee shall operate and maintain the control equipment (CE 905 and CE 906) at all times that stack gas from the control equipment is vented directly to the atmosphere. Monitoring and recording information stored in Pi, a data acquisition system.
EU 908 Emergency Diesel Generator	Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Normal operation meets this requirement.	Normal operation meets this requirement.
	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.	Fuel Supplier Documentation: Records shall be maintained for 5 years.	The Permittee shall obtain and maintain fuel supplier documentation for each shipment of fuel oil, documenting that the sulfur content does not exceed 0.5% by weight. Records shall be maintained for 5 years.
	Fuel type: Distillate Diesel fuel oil (No.1 or 2) only.	Fuel Supplier Documentation	The Permittee shall obtain and maintain fuel supplier documentation for each shipment of fuel oil, documenting that the sulfur content does not exceed 0.5% by weight. Records shall be maintained for 5 years.
	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.	Recordkeeping - Hours of Operation: The Permittee shall maintain documentation of hours of operation for EU 908.	Reporting: Annually by January 30th the report of the previous 12 monthly 12-month rolling sum calculations on the emergency diesel generator.
EU 909 Off-Machine Coater	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).	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,	Compliance Status Report: due 30 days after end of each calendar half-year following Permit Issuance, 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. The Permittee must determine the organic HAP applied on

Level/Unit*	Requirement (basis – see the attached CD-01)	Additional Monitoring	Discussion
		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).	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. 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.
FS 904 Intermediate Chip Booster Station (Blower with cyclone)	Total Particulate Matter: less than or equal to 3.0 lbs/hour	Historical testing has demonstrated compliance	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.
	Particulate Matter < 10 micron: less than or equal to 2.9 lbs/hour	Historical testing has demonstrated compliance	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.

3.3 Insignificant Activities

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

The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities.

Table 5. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Fuel use: space heaters fueled by, kerosene, natural gas, or propane	$PM \leq 0.6$ or 0.4 lb/MMBtu, depending on year constructed $Opacity \leq 20\%$ with exceptions (Minn. R. 7011.0510/515)	For this unit, based on the fuels used and EPA published emissions factors, it is highly unlikely that it could violate the applicable requirement. In addition, these types of units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.

Insignificant Activity	General Applicable Emission limit	Discussion
Infrared electric ovens	Opacity \leq 20% (Minn. R. 7011.0105 or 7011.0110)	These units are not likely to have any emissions of particulate matter at this site (used to dry off moisture). It is highly unlikely that they could violate the applicable requirement.
Emissions from a laboratory, as defined in Minn. R. 7007.1300, subp. 3(G)	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0710/715)	These are very small, intermittent, bench-top operations that typically do not even have any emissions. It is highly unlikely that they could violate the applicable requirement.
Brazing, soldering or welding equipment	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0710/715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	Opacity \leq 20% (Minn. R. 7011.0105 or 7011.0110))	While no known emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into an office area, so monitoring or testing is not feasible.
Individual emissions units at a stationary source, each of which has: A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide; B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for	Varies by equipment.	

Insignificant Activity	General Applicable Emission limit	Discussion
particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and C. For hazardous air pollutants, emissions units with: (1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or (2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart.		

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.

3.5 Comments Received

Public Notice Period: August 03, 2009 – September 02, 2009

EPA 45-day Review Period: December 01, 2009 – January 19, 2010

Comments were received during the public notice period. Attached are the comments as well as the MPCA's response to those comments. The revised permit was sent to EPA for their 45-day

Attachment 1
PTE Summary and Calculation Spreadsheets

Attachment 2
Facility Description and CD-01 Forms

Attachment 3
CAM

Attachment 4

Comments Received