

CLASS II AIR QUALITY PERMIT

Draft Permit No. 114007

PERMITTEE: International Paper Company
FACILITY: International Paper
PLACE ID: 2221
DATE ISSUED: Date Pending
EXPIRY DATE: Date Pending

SUMMARY

This Class II air quality permit is issued to International Paper Company, the Permittee, for the continued operation of International Paper. The facility is located at 2641 East 24th Street, Yuma, AZ 85365. This permit renews and supersedes Permit No. 88378.

The facility's potential to emit is greater than the significant thresholds identified in Arizona Administrative Code (A.A.C.) R18-2-101.132, but below major source thresholds. Therefore, a Class II permit is required for this facility in accordance with A.A.C. R18-2-302.B.2.a.

This permit is issued in accordance with Arizona Revised Statutes (A.R.S.) § 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations (CFR). All definitions, terms, and conditions used in this permit conform to those in the A.A.C. R18-2-101 et. seq. and Title 40 of the CFR, except as otherwise defined in this permit.

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ATTACHMENT "A": GENERAL PROVISIONS

I. PERMIT EXPIRATION AND RENEWAL

- A.** This permit is valid for a period of five (5) years from the date of issuance.
[A.R.S. § 49-426.F, A.A.C. R18-2-306.A.1]
- B.** The Permittee shall submit an application for renewal of this permit at least six (6) months, but not more than eighteen (18) months, prior to the date of permit expiration.
[A.A.C. R18-2-304.D.2]

II. COMPLIANCE WITH PERMIT CONDITIONS

- A.** The Permittee shall comply with all conditions of this permit including all applicable requirements of A.R.S. Title 49, Chapter 3, and the air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
[A.A.C. R18-2-306.A.8.a]
- B.** It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
[A.A.C. R18-2-306.A.8.b]

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

- A.** The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[A.A.C. R18-2-306.A.8.c]
- B.** The permit shall be reopened and revised under any of the following circumstances:
1. The ADEQ Director or the EPA Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
[A.A.C. R18-2-321.A.1.c]
 2. The ADEQ Director or the EPA Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.
[A.A.C. R18-2-321.A.1.d]

- C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. Permit reopenings shall not result in a resetting of the five-year permit term.
[A.A.C. R18-2-321.A.2]

IV. POSTING OF PERMIT

- A. The Permittee shall post this permit or a certificate of permit issuance on location where the equipment is installed in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:
[A.A.C. R18-2-315.A]
1. Current permit number; or
[A.A.C. R18-2-315.A.1]
 2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.
[A.A.C. R18-2-315.A.2]
- B. A copy of the complete permit shall be kept on site.
[A.A.C. R18-2-315.B]

V. FEE PAYMENT

The Permittee shall pay fees to the ADEQ Director pursuant to A.R.S. § 49-426(E) and A.A.C. R18-2-326.
[A.A.C. R18-2-306.A.9 and -326]

VI. EMISSIONS INVENTORY QUESTIONNAIRE

- A. The Permittee shall complete and submit to the ADEQ Director an emissions inventory questionnaire no later than June 1 every three (3) years beginning June 1, 2021. At the ADEQ Director's request, the Permittee may be required to complete and submit emissions inventory questionnaires in addition to the triennial emissions inventory questionnaire. The ADEQ Director shall notify in writing of the decision to require additional emissions inventory questionnaires.
[A.A.C. R18-2-327.A.1.b]
- B. The emissions inventory questionnaire shall be on the form provided by the ADEQ Director and shall include the information required by A.A.C. R18-2-327.A.3 for the previous calendar year.
[A.A.C. R18-2-327.A.3]
- C. The Permittee shall submit to the ADEQ Director an amendment to an emissions inventory questionnaire, containing the documentation required by A.A.C. R18-2-327.A.3, whenever the Permittee discovers or receives notice, within two (2) years of the original submittal, that incorrect or insufficient information was submitted to the ADEQ Director by a previous emissions inventory questionnaire. The

amendment shall be submitted to the ADEQ Director within 30 days of discovery or receipt of notice. If the incorrect or insufficient information resulted in an incorrect annual emissions fee, the ADEQ Director shall require that additional payment be made or shall apply an amount as a credit to a future annual emissions fee. The submittal of an amendment shall not subject the Permittee to an enforcement action or a civil or criminal penalty if the original submittal of incorrect or insufficient information was not due to willful neglect.

[A.A.C. R18-2-327.A.4]

VII. COMPLIANCE CERTIFICATION

- A.** The Permittee shall submit a compliance certification to the ADEQ Director annually which describes the compliance status of the source with respect to each permit condition. The certification shall be submitted no later than March 15th, and shall report the compliance status of the source during the period between February 1st of the previous year and January 31st of the current year.

[A.A.C. R18-2-309.2.a]

- B.** The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;

[A.A.C. R18-2-309.2.c.i]

2. Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period;

[A.A.C. R18-2-309.2.c.ii]

3. Status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certifications shall identify each deviation (including any deviations reported pursuant to Condition XII.B of this Attachment) during the period covered by the certification and take it into account for consideration in the compliance certification; and

[A.A.C. R18-2-309.2.c.iii]

4. Other facts the ADEQ Director may require in determining the compliance status of the source.

[A.A.C. R18-2-309.2.c.iv]

- C.** A progress report on all outstanding compliance schedules shall be submitted every six (6) months beginning six (6) months after permit issuance.

[A.A.C. R18-2-309.5.d]

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[A.A.C. R18-2-309.3]

IX. INSPECTION AND ENTRY

Upon presentation of proper credentials, the Permittee shall allow the ADEQ Director or the authorized representative of the ADEQ Director to:

- A.** Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.a]
- B.** Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;
[A.A.C. R18-2-309.4.b]
- C.** Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
[A.A.C. R18-2-309.4.c]
- D.** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
[A.A.C. R18-2-309.4.d]
- E.** Record any inspection by use of written, electronic, magnetic and photographic media.
[A.A.C. R18-2-309.4.e]

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

If this source becomes subject to a standard promulgated by the EPA Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

[A.A.C. R18-2-304.D.3]

XI. ACCIDENTAL RELEASE PROGRAM

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.
[40 CFR Part 68]

XII. EXCESS EMISSIONS AND PERMIT DEVIATIONS REPORTING

- A.** Excess Emissions Reporting
[A.A.C. R18-2-310.01]

- 1. Excess emissions shall be reported as follows:

- a. The Permittee shall report to the ADEQ Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:
- [A.A.C. R18-2-310.01.A]
- (1) Notification by telephone, facsimile, or electronic means within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.
[A.A.C. R18-2-310.01.A.1]
- (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a(1) above.
[A.A.C. R18-2-310.01.A.2]
- b. The report shall contain the following information:
- (1) Identity of each stack or other emission point where the excess emissions occurred;
[A.A.C. R18-2-310.01.B.1]
- (2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;
[A.A.C. R18-2-310.01.B.2]
- (3) Time and duration, or expected duration, of the excess emissions;
[A.A.C. R18-2-310.01.B.3]
- (4) Identity of the equipment from which the excess emissions emanated;
[A.A.C. R18-2-310.01.B.4]
- (5) Nature and cause of the emissions;
[A.A.C. R18-2-310.01.B.5]
- (6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions;
[A.A.C. R18-2-310.01.B.6]
- (7) Steps that were or are being taken to limit the excess emissions; and
[A.A.C. R18-2-310.01.B.7]
- (8) If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken

to comply with the permit procedures governing source operation during periods of startup or malfunction.

[A.A.C. R18-2-310.01.B.8]

2. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant to Condition XII.A.1 above.

[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Where the applicable requirement contains a definition of prompt or otherwise specifies a timeframe for reporting deviations, that definition or timeframe shall govern. Where the applicable requirement does not address the timeframe for reporting deviations, the Permittee shall submit reports of deviations according to the following schedule:

1. Notice that complies with Condition XII.A above is prompt for deviations that constitute excess emissions;
2. Notice that is submitted within two (2) working days of discovery of the deviation is prompt for deviations of permit conditions identified by Condition I.B.1 of Attachment "B";
3. Except as provided in Conditions XII.B.1 and 2, prompt notification of all other types of deviations shall be annually, concurrent with the annual compliance certifications required in Section VII, and can be submitted via myDEQ, the Arizona Department of Environmental Quality's online portal.

[A.A.C. R18-2-306.A.5.b.i]

[A.A.C. R18-2-306.A.5.b.ii]

[A.A.C. R18-2-306.A.5.b.ii]

C. Emergency Provision

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

[A.A.C. R18-2-306.E.1]

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if Condition XII.C.3 below is met.

[A.A.C. R18-2-306.E.2]

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

[A.A.C. R18-2-306.E.3]

- a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

[A.A.C. R18-2-306.E.3.a]

- b. The permitted facility was being properly operated at the time of the emergency;

[A.A.C. R18-2-306.E.3.b]

- c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

[A.A.C. R18-2-306.E.3.c]

- d. The Permittee submitted notice of the emergency to the ADEQ Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

[A.A.C. R18-2-306.E.3.d]

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

[A.A.C. R18-2-306.E.4]

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[A.A.C. R18-2-306.E.5]

D. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

1. Applicability

A.A.C. R18-2-310 establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- a. Promulgated pursuant to Sections 111 or 112 of the Act;

[A.A.C. R18-2-310.A.1]
[State Enforceable Only]

- b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;
[A.A.C. R18-2-310.A.2]
[State Enforceable Only]
- c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;
[A.A.C. R18-2-310.A.3]
[State Enforceable Only]
- d. Contained in A.A.C. R18-2-715.F; or
[A.A.C. R18-2-310.A.4]
[State Enforceable Only]
- e. Included in a permit to meet the requirements of A.A.C. R18-2-406(A)(5).
[A.A.C. R18-2-310.A.5]
[State Enforceable Only]

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.B]
[State Enforceable Only]

- a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;
[A.A.C. R18-2-310.B.1]
[State Enforceable Only]
- b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
[A.A.C. R18-2-310.B.2]
[State Enforceable Only]
- c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;

[A.A.C. R18-2-310.B.3]
[State Enforceable Only]

- d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

[A.A.C. R18-2-310.B.4]
[State Enforceable Only]

- e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

[A.A.C. R18-2-310.B.5]
[State Enforceable Only]

- f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

[A.A.C. R18-2-310.B.6]
[State Enforceable Only]

- g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

[A.A.C. R18-2-310.B.7]
[State Enforceable Only]

- h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

[A.A.C. R18-2-310.B.8]
[State Enforceable Only]

- i. All emissions monitoring systems were kept in operation if at all practicable; and

[A.A.C. R18-2-310.B.9]
[State Enforceable Only]

- j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

[A.A.C. R18-2-310.B.10]
[State Enforceable Only]

3. Affirmative Defense for Startup and Shutdown

- a. Except as provided in Condition XII.D.3.b below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a

judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

[A.A.C. R18-2-310.C.1]
[State Enforceable Only]

- (1) The excess emissions could not have been prevented through careful and prudent planning and design;

[A.A.C. R18-2-310.C.1.a]
[State Enforceable Only]

- (2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

[A.A.C. R18-2-310.C.1.b]
[State Enforceable Only]

- (3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

[A.A.C. R18-2-310.C.1.c]
[State Enforceable Only]

- (4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

[A.A.C. R18-2-310.C.1.d]
[State Enforceable Only]

- (5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

[A.A.C. R18-2-310.C.1.e]
[State Enforceable Only]

- (6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

[A.A.C. R18-2-310.C.1.f]
[State Enforceable Only]

- (7) All emissions monitoring systems were kept in operation if at all practicable; and

[A.A.C. R18-2-310.C.1.g]
[State Enforceable Only]

- (8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.

[A.A.C. R18-2-310.C.1.h]
[State Enforceable Only]

XIII. RECORDKEEPING REQUIREMENTS

- b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.D.2 above.

[A.A.C. R18-2-310.C.2]
[State Enforceable Only]

4. Affirmative Defense for Malfunctions during Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.D.2 above.

[A.A.C. R18-2-310.D]
[State Enforceable Only]

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Conditions XII.D.2 or XII.D.3, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.D and Condition XII.A, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

[A.A.C. R18-2-310.E]
[State Enforceable Only]

XIII. RECORDKEEPING REQUIREMENTS

- A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;

[A.A.C. R18-2-306.A.4.a.i]

2. The date(s) any analyses were performed;

[A.A.C. R18-2-306.A.4.a.ii]

3. The name of the company or entity that performed the analyses;

[A.A.C. R18-2-306.A.4.a.iii]

4. A description of the analytical techniques or methods used;

[A.A.C. R18-2-306.A.4.a.iv]

5. The results of analyses; and

[A.A.C. R18-2-306.A.4.a.v]

6. The operating conditions as existing at the time of sampling or measurement.

[A.A.C. R18-2-306.A.4.a.vi]

- B. The Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring

sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[A.A.C. R18-2-306.A.4.b]

XIV. DUTY TO PROVIDE INFORMATION

- A.** The Permittee shall furnish to the ADEQ Director, within a reasonable time, any information that the ADEQ Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the ADEQ Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the EPA Administrator along with a claim of confidentiality.

[A.A.C. R18-2-306.A.8.e]

- B.** If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[A.A.C. R18-2-304.H]

XV. PERMIT AMENDMENT OR REVISION

The Permittee shall apply for a permit amendment or revision for changes to the facility which does not qualify for a facility change without revision under Section XVII below, as follows:

- A.** Facility Changes that Require a Permit Revision;

[A.A.C. R18-2-317.01]

- B.** Administrative Permit Amendment;

[A.A.C. R18-2-318]

- C.** Minor Permit Revision; and

[A.A.C. R18-2-319]

- D.** Significant Permit Revision.

[A.A.C. R18-2-320]

The applicability and requirements for such action are defined in the above referenced regulations.

XVI. FACILITY CHANGE WITHOUT A PERMIT REVISION

- A.** Except for a physical change or change in the method of operation at a Class II source requiring a permit revision under A.A.C. R18-2-317.01, or a change subject to logging or notice requirements in Conditions XVI.B or XVI.C, a change at a Class

If source shall not be subject to revision, notice, or logging requirements under this Section.

[A.A.C. R18-2-317.02.A]

B. The following changes may be made if the source keeps on site records of the changes according to Condition XVI.H below:

[A.A.C. R18-2-317.02.B]

1. Implementing an alternative operating scenario, including raw materials changes;

[A.A.C. R18-2-317.02.B.1]

2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;

[A.A.C. R18-2-317.02.B.2]

3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.69 but not listed in the permit;

[A.A.C. R18-2-317.02.B.3]

4. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The ADEQ Director may require verification of efficiency of the new equipment by performance tests; and

[A.A.C. R18-2-317.02.B.4]

5. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.

[A.A.C. R18-2-317.02.B.5]

C. The following changes may be made if the source provides written notice to the Department in advance of the change as provided below:

[A.A.C. R18-2-317.02.C]

1. Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency: seven days. The ADEQ Director may require verification of efficiency of the new equipment by performance tests;

[A.A.C. R18-2-317.02.C.1]

2. A physical change or change in the method of operation that increases actual emissions more than 10% of the major source threshold for any conventional pollutant but does not require a permit revision: seven days;

[A.A.C. R18-2-317.02.C.2]

3. Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency: 30 days. The ADEQ Director may require verification of efficiency of the new equipment by performance tests;
[A.A.C. R18-2-317.02.C.3]
4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;
[A.A.C. R18-2-317.02.C.4]
5. A change that amounts to reconstruction of the source or an affected facility: seven days. For purposes of this Subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds 50% of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the 12 consecutive months beginning with commencement of construction; and
[A.A.C. R18-2-317.02.C.5]
6. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: 30 days. For purposes of this requirement, an applicable regulatory threshold for a conventional air pollutant shall be 10% of the applicable major source threshold for that pollutant.
[A.A.C. R18-2-317.02.C.6]

D. For each change under Condition XVI.C, the written notice shall be by certified mail or hand delivery and shall be received by the ADEQ Director the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, but must be provided as far in advance of the change, or if advance notification is not practicable, as soon after the change as possible. The written notice shall include:

[A.A.C. R18-2-317.02.D]

1. When the proposed change will occur,
[A.A.C. R18-2-317.02.D.1]
2. A description of the change,
[A.A.C. R18-2-317.02.D.2]
3. Any change in emissions of regulated air pollutants, and
[A.A.C. R18-2-317.02.D.3]
4. Any permit term or condition that is no longer applicable as a result of the change.
[A.A.C. R18-2-317.02.D.4]

- E.** The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section, other than implementation of an alternate operating scenario under Condition XVI.B.1.
[A.A.C. R18-2-317.02.F]
- F.** Notwithstanding any other part of this Section, the ADEQ Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the Permittee under this Section over the term of the permit, constitutes a change under subsection A.A.C. R18-2-317.01.A.
[A.A.C. R18-2-317.02.G]
- G.** A copy of all logs required under Condition XVI.B shall be filed with the ADEQ Director within 30 days after each anniversary of the permit issuance date. If no changes were made at the source requiring logging, a statement to that effect shall be filed instead.
[A.A.C. R18-2-317.02.I]
- H. Logging Requirements**
[Arizona Administrative Code, Appendix 3]
1. Each log entry required by a change under Condition XVI.B shall include at least the following information:
 - a. A description of the change, including:
 - (1) A description of any process change;
 - (2) A description of any equipment change, including both old and new equipment descriptions, model numbers, and serial numbers, or any other unique equipment ID number; and
 - (3) A description of any process material change.
 - b. The date and time that the change occurred.
 - c. The provisions of Condition XVI.B that authorize the change to be made with logging.
 - d. The date the entry was made and the first and last name of the person making the entry.
 2. Logs shall be kept for five (5) years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially numbered pages, or in any other form, including electronic format, approved by the ADEQ Director.

XVII. TESTING REQUIREMENTS

- A.** The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the ADEQ Director.

[A.A.C. R18-2-312.A]

- B.** Operational Conditions during Performance Testing

Performance tests shall be conducted under such conditions as the ADEQ Director shall specify to the plant operator based on representative performance of the source. The Permittee shall make available to the ADEQ Director such records as may be necessary to determine the conditions of the performance tests. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative conditions of performance tests unless otherwise specified in the applicable standard.

[A.A.C. R18-2-312.C]

- C.** Performance Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the ADEQ Director pursuant to A.A.C. R18-2-312.B.

[A.A.C. R18-2-312.B]

- D.** Test Plan

At least 14 working days prior to performing a test, the Permittee shall submit a test plan to the ADEQ Director, which must include the following, in addition to all other applicable requirements, as identified in the Arizona Testing Manual:

[A.A.C. R18-2-312.B]

1. Test duration;
2. Test location(s);
3. Test method(s); and
4. Source operation and other parameters that may affect test results.

- E.** Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

[A.A.C. R18-2-312.E]

1. Sampling ports adequate for test methods applicable to the facility;
2. Safe sampling platform(s);
3. Safe access to sampling platform(s); and
4. Utilities for sampling and testing equipment.

- F.** Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the ADEQ Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the ADEQ Director or the ADEQ Director's designee is present, tests may only be stopped with the ADEQ Director's or such designee's approval. If the ADEQ Director or the ADEQ Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

[A.A.C. R18-2-312.F]

G. Report of Final Test Results

A written report of the results of performance tests conducted pursuant to 40 CFR 60 or 63, shall be submitted to the ADEQ Director within 60 days after the test is performed. A written report of the results of all other performance tests shall be submitted within 4 weeks after the test is performed, or as otherwise provided in the Arizona Testing Manual. All performance testing reports shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

[A.A.C. R18-2-312.A and B]

H. Extension of Performance Test Deadline

For performance testing required under Condition XVII.A above, the Permittee may request an extension to a performance test deadline due to a force majeure event as follows:

[A.A.C. R18-2-312.J]

1. If a force majeure event is about to occur, occurs, or has occurred for which the Permittee intends to assert a claim of force majeure, the Permittee shall notify the ADEQ Director in writing as soon as practicable following the date the Permittee first knew, or through due diligence should have known that the event may cause or caused a delay in testing beyond the regulatory deadline. The notification must occur before the performance test deadline unless the initial force majeure or a subsequent force majeure event delays the notice, and in such cases, the notification shall be given as soon as practicable.

[A.A.C. R18-2-312.J.1]

2. The Permittee shall provide to the ADEQ Director a written description of the force majeure event and a rationale for attributing the delay in testing

beyond the regulatory deadline to the force majeure; describe the measures taken or to be taken to minimize the delay; and identify a date by which the Permittee proposes to conduct the performance test. The performance test shall be conducted as soon as practicable after the force majeure event occurs.

[A.A.C. R18-2-312.J.2]

3. The decision as to whether or not to grant an extension to the performance test deadline is solely within the discretion of the ADEQ Director. The ADEQ Director shall notify the Permittee in writing of approval or disapproval of the request for an extension as soon as practicable.

[A.A.C. R18-2-312.J.3]

4. Until an extension of the performance test deadline has been approved by the ADEQ Director under Conditions XVII.H.1, 2, and 3 above, the Permittee remains subject to the requirements of Section XVII.

[A.A.C. R18-2-312.J.4]

5. For purposes of this Section XVII, a “force majeure event” means an event that will be or has been caused by circumstances beyond the control of the Permittee, its contractors, or any entity controlled by the Permittee that prevents it from complying with the regulatory requirement to conduct performance tests within the specified timeframe despite the Permittee's best efforts to fulfill the obligation. Examples of such events are acts of nature, acts of war or terrorism, or equipment failure or safety hazard beyond the control of the Permittee.

[A.A.C. R18-2-312.J.5]

XVIII. PROPERTY RIGHTS

This permit does not convey any property rights of any sort, or any exclusive privilege.

[A.A.C. R18-2-306.A.8.d]

XIX. SEVERABILITY CLAUSE

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

[A.A.C. R18-2-306.A.7]

XX. PERMIT SHIELD

Compliance with the Conditions of this Permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled “Permit Shield”. The permit shield shall not apply to minor revisions pursuant to Condition XV.C of this Attachment and any facility changes without a permit revision pursuant to Section XVI of this Attachment.

[A.A.C. R18-2-317.F, -320, and -325]

XXI. PROTECTION OF STRATOSPHERIC OZONE

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

[40 CFR Part 82]

XXII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

For all equipment subject to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulation.

[40 CFR Part 60 Subpart A and Part 63 Subpart A]

DRAFT

ATTACHMENT "B": SPECIFIC CONDITIONS

I. FACILITY-WIDE REQUIREMENTS

A. Opacity

1. Instantaneous Surveys and Six-Minute Observations

a. Instantaneous Surveys

Any instantaneous survey required by this permit shall be determined by either option listed in Conditions I.A.1.a(1) and (2):
[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within two (2) hours.

(2) EPA Reference Method 9 Certified Observer.

[A.A.C. R18-2-306.A.3.c]

b. Six-Minute Observations

Any six-minute observation required by this permit shall be determined by either option listed in Conditions I.A.1.b(1) and (2):
[A.A.C. R18-2-311.B]

(1) Alternative Method ALT-082 (Digital Camera Operating Technique)

(a) The Permittee, or Permittee representative, shall be certified in the use of Alternative Method ALT-082.

(b) The results of all instantaneous surveys and six-minute observations shall be obtained within two (2) hours.

(2) EPA Reference Method 9.

c. The Permittee shall have on site or on call a person certified in EPA Reference Method 9 unless all six-minute Method 9 observations required by this permit are conducted as a six-minute Alternative Method ALT-082 (Digital Camera Operating Technique) and all instantaneous visual surveys required by this permit are conducted

as an instantaneous ALT-082 camera survey. Any six-minute Method 9 observation required by this permit can be conducted as a six-minute Alternative Method ALT-082 and any instantaneous visual survey required by this permit can be conducted as an instantaneous ALT-082 camera survey.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c]

- a. At the frequency specified in the following sections of this permit, the Permittee shall conduct an instantaneous survey of visible emissions from both process stack sources, when in operation, and fugitive dust sources.
- b. If the visible emissions on an instantaneous basis appears less than or equal to the applicable opacity standard, then the Permittee shall keep a record of the name of the observer, the date on which the instantaneous survey was made, and the results of the instantaneous survey.
- c. If the visible emissions on an instantaneous basis appears greater than the applicable opacity standard, then the Permittee shall immediately conduct a six-minute observation of the visible emissions.
 - (1) If the six-minute observation of the visible emissions is less than or equal to the applicable opacity standard, then the Permittee shall record the name of the observer, the date on which the six-minute observation was made, and the results of the six-minute observation.
 - (2) If the six-minute observation of the visible emissions is greater than the applicable opacity standard, then the Permittee shall do the following:
 - (a) Adjust or repair the controls or equipment to reduce opacity to less than or equal to the opacity standard;
 - (b) Record the name of the observer, the date on which the six-minute observation was made, the results of the six-minute observation, and all corrective action taken;
 - (c) Report the event as an excess emission for opacity in accordance with Condition XII.A of Attachment "A"; and

- (d) Conduct another six-minute observation to document the effectiveness of the adjustments or repairs completed.

B. Recordkeeping and Reporting Requirements

1. Deviations from the following Attachment "B" permit conditions shall be promptly reported in accordance with Condition XII.B.2 of Attachment "A":
[A.A.C. R18-2-306.A.5.b]
 - a. Condition III.B.2.a; and
 - b. Condition III.B.2.b
2. The Permittee shall maintain, on-site, records of the manufacturer supplied operations and maintenance instructions or Operation and Maintenance Plan for minimizing emissions for all equipment identified in Attachment "C".
[A.A.C. R18-2-306.A.3.c]
3. The Permittee shall submit reports of all monitoring activities required in Attachment "B" along with the annual compliance certification required by Section VII of Attachment "A."
[A.A.C. R18-2-306.A.5.a]

**II. BOILER SUBJECT TO NEW SOURCE PERFORMANCE STANDARDS (NSPS)
SUBPART DC**

A. Applicability

This Section applies to the boiler identified in the Equipment List of Attachment "C".

B. Monitoring and Recordkeeping Requirements

1. Except as provided under Conditions II.B.2 and 3 below, the Permittee shall record and maintain records of the amount of fuel combusted during each day the boiler was operated.
[40 CFR 60.48c(g)(1)]
2. As an alternative to meeting the requirements of Condition II.B.1 above, the Permittee may elect to record and maintain records of the amount of fuel combusted during each calendar month.
[40 CFR 60.48c(g)(2)]
3. As an alternative to meeting the requirements of Condition II.B.1 above, the Permittee may elect to record and maintain records of the total amount of fuel delivered to the facility during each calendar month.
[40 CFR 60.48c(g)(3)]

4. The Permittee shall maintain these records for a period of two (2) years following the date of such records.

[40 CFR 60.48c(i)]

5. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with 40 CFR 60.48c(g) and (i).

[A.A.C. R18-2-325]

III. UNCLASSIFIED SOURCES

A. Applicability

This Section applies to the following equipment: flexographic folder gluers (3), rotary die cutter (1), wax cascaders (2), wax storage tanks (5), corrugator, scrap paper handling systems 1 and 2, and the starch silo as described in the Equipment List of Attachment "C".

B. Particulate Matter (PM)

1. Opacity, Emission Limitations, and Standards

- a. The Permittee shall not cause or allow any plume or effluent from any unclassified source to exhibit opacity greater than 20 percent measured in accordance with EPA Reference Method 9.

[A.A.C. R18-2-702.B.1]

- b. The Permittee shall not cause or allow to be discharged into the atmosphere particulate matter in excess of the amount calculated by the following equation:

[A.A.C. R18-2-730.A.1.a]

$$E = 4.10P^{0.67}$$

Where:

E = Maximum allowable particulate emission rate in pounds-mass per hour.

P = Process weight rate in tons-mass per hour.

- c. The total process weight from all similar units employing a similar type process shall be used in determining the maximum allowable emission of particulate matter.

[A.A.C. R18-2-730.B]

2. Air Pollution Control Requirements

- a. *The Permittee shall operate and maintain the baghouse in accordance with manufacturer's specifications to control emissions vented from the starch storage silo.*

[A.A.C. R18-2-306.01 and A.A.C. R18-2-331.A.3.e]

[Material Permit Conditions are indicated by underlines and italics]

- b. *The Permittee shall operate and maintain the cyclones in accordance with manufacturer's specifications to control emissions vented from the corrugator and scrap handling system.*

[A.A.C. R18-2-306.01 and A.A.C. R18-2-331.A.3.e]

[Material Permit Conditions are indicated by underlines and italics]

3. Monitoring, Recordkeeping, and Reporting Requirements

- a. The Permittee shall conduct a quarterly survey of visible emissions emanating from the starch silo, corrugator and scrap handling systems 1 and 2 in accordance with Condition I.A. 1.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall maintain logs of all maintenance activities performed on the baghouse and cyclones. These logs shall include the type of maintenance activity being performed and the duration of each maintenance activity, including the date, starting time, and ending time of the maintenance activities. These logs shall be maintained on-site and shall be readily available representatives upon request to ADEQ.

[A.A.C. R18-2-306.A.4]

4. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-702.B.1, A.A.C. R18-2-730.A.1.a, and A.A.C. R18-2-730.B.

[A.A.C. R18-2-325]

C. Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

1. Emission Limitations and Standards

- a. The Permittee shall not cause the emission of gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution.

[A.A.C. R18-2-730.D]

- b. Materials including solvents or other volatile compounds, acids, and alkalis utilized in the process shall be processed, stored, used, and transported in such a manner and by such means that they will not evaporate, leak, escape, or be otherwise be discharged into the ambient air so as to cause or contribute to air pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage, or discharge, the installation

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and use of such control methods, devices, or equipment shall be mandatory.

[A.A.C. R18-2-730.F]

- c. Where a stack, vent or other outlet is at such a level that fumes, gas, mist, odor, smoke, vapor, or any combination thereof constituting air pollution is discharged to adjoining property, the ADEQ Director may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the Permittee thereof to a degree that will adequately dilute, reduce or eliminate the discharge of air pollution to the adjoining property.

[A.A.C. R18-2-730.G]

2. Monitoring, Recordkeeping, and Reporting Requirements

- a. The Permittee shall maintain monthly usage records of all inks, additives/cleaners, adhesives, wax, glues, and VOC and HAP containing materials used in the corrugator and finishing process. The records shall include the corresponding VOC and HAP content.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall maintain records of the Material Safety Data Sheets (MSDS) for all inks, additives/cleaners, adhesives, wax, glues, and any VOC and HAP containing materials used in the corrugator and finishing process.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-702.B, A.A.C. R18-2-730.D, A.A.C. R18-2-730.F and A.A.C. R18-2-730.G.

[A.A.C. R18-2-325]

IV. INTERNAL COMBUSTION ENGINE

A. Applicability

This Section applies to the emergency fire water pump as identified in the Equipment List of Attachment "C".

B. Particulate Matter and Opacity

1. Emissions Limitations and Standards

- a. The Permittee shall not cause or allow to be discharged into the atmosphere from the emergency fire water pump engine stack particulate matter in excess of the amount calculated by the following equation:

[A.A.C. R18-2-719.C.1]

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$$E = 1.02Q^{0.769}$$

Where:

E = the maximum allowable particulate emission rate in pounds-mass per hour.

Q = the heat input in million Btu per hour.

- b. For the purposes of the calculations required in Condition IV.B.1.a above, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all operating fuel-burning units at a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

- c. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from the emergency fire water pump engine, smoke for any period greater than 10 consecutive seconds which exceeds 40% opacity.

[A.A.C. R18-2-719.E]

- (1) Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

[A.A.C. R18-2-719.E]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall conduct a quarterly survey of visible emissions emanating from the emergency fire water pump engine stack when it is in operation in accordance with Condition I.A.1 above.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall keep records of fuel supplier certifications. The certification shall contain information regarding the name of fuel supplier and lower heating value of the fuel. These records shall be made available upon request to ADEQ.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.B, -719.C.1 and -719.E.

[A.A.C. R18-2-325]

C. Sulfur Dioxide

1. Emission Limitations and Standards

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- a. The Permittee shall not emit or cause to emit more than 1.0 pound of sulfur dioxide per million Btu heat input.
[A.A.C. R18-2-719.F]
- b. The Permittee shall not burn high sulfur oil in the emergency fire water pump engine.
[A.A.C. R18-2-719.H]

2. Recordkeeping and Reporting Requirements

- a. The Permittee shall keep records of fuel supplier certifications or other documentation listing the sulfur content to demonstrate compliance with Condition IV.C.1 above. The certification shall contain the sulfur content of the fuel and the method used to determine the sulfur content of the fuel. These records shall be made available upon request to ADEQ.
[A.A.C. R18-2-306.A.3.c and -719.I]
- b. The Permittee shall report to the ADEQ Director any daily period during which the sulfur content of the fuel being fired in the emergency fire water pump engine exceeds 0.8%.
[A.A.C. R18-2-719.J]

3. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-719.F, A.A.C. R18-2-719.H, A.A.C. R18-2-719.I and A.A.C. R18-2-719.J.

[A.A.C. R18-2-325]

D. Hazardous Air Pollutants

1. Operating Requirements

- a. The Permittee shall comply with the operating limitations in Condition IV.D.1 at all times.
[40 CFR 63.6605(a)]
- b. The Permittee shall operate and maintain the emergency fire pump engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the facility to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the ADEQ Director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 CFR 63.6605(b)]

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- c. The Permittee shall operate and maintain the emergency fire pump engine according to the manufacturer's emission-related written instructions or develop a maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

- d. *The Permittee shall install a non-resettable hour meter if one is not already installed.*

[40 CFR 63.6625(f) and A.A.C. R18-2-331.A.3.c]

[Material Permit Conditions are indicated by underline and italics]

- e. The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine not to exceed 30 minutes.

[40 CFR 63.6625(h)]

- f. The Permittee must operate the emergency fire pump engine according to the following requirements in order to be considered an emergency stationary internal combustion engine under this Section:

- (1) There is no time limit on the use of the engine in emergency situations.

[40 CFR 63.6640(f)(1)]

- (2) The Permittee may operate the engine for any of the following purposes for a maximum of 100 hours per calendar year:

[40 CFR 63.6640(f)(2)]

Maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine.

[40 CFR 63.6640(f)(2)(i)]

- (3) The emergency fire pump engine may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in Condition IV.D.1.f(2) of this Section.

[40 CFR 63.6640(f)(4)]

- g. The Permittee shall change the oil and filter every 500 hours operation or within 1 year + 30 days of the previous change,

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whichever comes first. If the Permittee prefers to extend the oil change requirement, an oil analysis program described below shall be completed. The oil analysis must be performed at the same frequency specified for changing the oil and filter. The Permittee shall at a minimum analyze the following three parameters: Total Base Number, Viscosity and Water Content. The condemning limits for these parameters are as follows:

[40 CFR 63.6625(i) and 40 CFR 63 Subpart ZZZZ, Table 2d]

- (1) Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
- (2) Viscosity: changed more than 20 percent from the viscosity of oil when new; and
- (3) Water Content: greater than 0.5 percent by volume.

If all of the above limits are not exceeded, the Permittee is not required to change the oil and filter. If any of the above limits are exceeded, the Permittee shall change the oil and filter within 2 business days of receiving the results of the analysis or before commencing operation, whichever is later. Records shall be kept of the parameters that are analyzed as part of the program, the results of the analysis, and the oil and filter changes for the engine. The analysis program shall be part of the maintenance plan for the operation of the engine.

- h. The Permittee shall inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a) and 40 CFR 63 Subpart ZZZZ, Table 2d]

- i. The Permittee shall inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a) and 40 CFR 63 Subpart ZZZZ, Table 2d]

2. Recordkeeping Requirements

- a. The Permittee shall keep records of the parameters that are analyzed and the results of the oil analysis, if any, and the oil and filter changes for the engine.

[40 CFR 63.6625(i)]

- b. The Permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.

[40 CFR 63.6655(f)]

3. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with 40 CFR 63.6603(a), -6605(a), -6605(b), -6625(e), -6625(f), -6625(h), -6625(i), -6640(f), -6640(f)(2), -6640(f)(2)(i), -6640(f)(4), -6655(d), -6655(e), -6655(f) and Table 2d of 40 CFR 63 Subpart ZZZZ.

[A.A.C. R18-2-325]

V. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any non-point source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways and Streets, Storage Piles, and Material Handling

1. Emission Limitations and Standards

- a. Opacity of emissions from any fugitive dust non-point source shall not be greater than 40%.

[A.A.C. R18-2-614]

- b. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

- (1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

- (2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

- (3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring,

V. FUGITIVE DUST REQUIREMENTS

wetting down or by other reasonable means when a roadway or alley is used, repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

- (4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits;

[A.A.C. R18-2-605.B]

- (5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust;

[A.A.C. R18-2-606]

- (6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

- (7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents; and

[A.A.C. R18-2-607.B]

- (8) Any other method as proposed by the Permittee and approved by the ADEQ Director.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring and Recordkeeping Requirements

- a. The Permittee shall maintain records of the dates on which any of the activities above were performed and the control measures that were adopted listed in Condition V.B.1.b.

[A.A.C. R18-2-306.A.3.c]

- b. The Permittee shall conduct a monthly survey of visible emissions from fugitive sources in accordance with Condition I.A of Attachment "B".

[A.A.C. R18-2-306.A.3.c]

C. Permit Shield

Compliance with the Conditions of this Section shall be deemed compliance with A.A.C. R18-2-604, -605, -606, 607, and -614.

[A.A.C. R18-2-325]

VI. OTHER PERIODIC ACTIVITIES

A. Abrasive Blasting

1. Particulate Matter and Opacity

a. Emission Limitations and Standards

The Permittee shall not cause or allow sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Good modern practices include:

[A.A.C. R18-2-726]

- (1) Wet blasting;
- (2) Effective enclosures with necessary dust collecting equipment; or
- (3) Any other method approved by the ADEQ Director.

b. Opacity

The Permittee shall not cause, allow or permit visible emissions from sandblasting or other abrasive blasting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

2. Monitoring and Recordkeeping Requirements

a. Each time an abrasive blasting project is conducted, the Permittee shall make a record of the following:

[A.A.C. R18-2-306.A.3.c]

- (1) The date the project was conducted;
- (2) The duration of the project; and
- (3) Type of control measures employed.

b. Each time an abrasive blasting project is conducted, the Permittee shall monitor visible emissions from the project in accordance with Condition I.A of Attachment "B".

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with Condition VI.A.1.a shall be deemed compliance with A.A.C. R18-2-702.B.3 and A.A.C. R18-2-726.

[A.A.C. R18-2-325]

B. Use of Paints

1. Volatile Organic Compounds

a. Emission Limitations and Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

- (1) The Permittee shall not conduct or cause to be conducted any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96 percent of the overspray.

[A.A.C. R18-2-727.A]

- (2) The Permittee or their designated contractor shall not either:

- (a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or
- (b) Thin or dilute any architectural coating with a photochemically reactive solvent.

[A.A.C. R18-2-727.B]

- (3) For the purposes of Condition VI.B.1.a(2), a photochemically reactive solvent shall be any solvent with an aggregate of more than 20 percent of its total volume composed of the chemical compounds classified in Condition VI.B.1.a(3), or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

[A.A.C. R18-2-727.C]

- (a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation-hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5 percent.

[A.A.C. R18-2-727.C.1]

- (b) A combination of aromatic compounds with eight or more carbon atoms to the molecule except ethylbenzene: 8 percent.

[A.A.C. R18-2-727.C.2]

VI. OTHER PERIODIC ACTIVITIES

- (c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichlorethylene or toluene: 20 percent.

[A.A.C. R18-2-727.C.3]

- (4) Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Condition VI.B.1.a(3), it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C. R18-2-727.D]

b. Monitoring and Recordkeeping Requirements

- (1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

[A.A.C. R18-2-306.A.3.c]

- (a) The date the project was conducted;
- (b) The duration of the project;
- (c) Type of control measures employed;
- (d) Safety Data Sheets (SDS) for all paints and solvents used in the project; and
- (e) The amount of paint consumed during the project.

- (2) Each time a spray painting project is conducted, the Permittee shall monitor visible emissions in accordance with Condition I.A of Attachment "B".

[A.A.C. R18-2-306.A.3.c]

- (3) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VI.B.1.b(1).

[A.A.C. R18-2-306.A.3.c]

c. Permit Shield

Compliance with Condition VI.B.1.a shall be deemed compliance with A.A.C. R18-2-727.

[A.A.C. R18-2-325]

2. Opacity

a. Emission Limitation and Standard

The Permittee shall not cause, allow or permit visible emissions from spray painting operations in excess of 20% opacity.

[A.A.C. R18-2-702.B.3]

b. Permit Shield

Compliance with Condition VI.B.2.a shall be deemed compliance with A.A.C. R18-2-702.B.3.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants

1. Emission Limitations and Standards

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M - National Emission Standards for Hazardous Air Pollutants - Asbestos.

[A.A.C. R18-2-1101.A.12]

2. Monitoring and Recordkeeping Requirement

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with Condition VI.C.1 shall be deemed compliance with A.A.C. R18-2-1101.A.12.

[A.A.C. R18-2-325]

ATTACHMENT C: EQUIPMENT LIST

ATTACHMENT “C”: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
Boiler	20.08 MMBtu/hr	Hurst	S5-G-600-250	S3000-230-20	2019	B01	40 CFR 60 Subpart Dc
Flexographic Folder Gluer	12,000 sheets/hr	Langston Saturn III	5134	884588	1998	5134	A.A.C. R18-2-702 and - 730
Flexographic Folder Gluer	6,000 sheets/hr	United 50"x100"	5184	GL50-2P-146Q	1995	5184	A.A.C. R18-2-702 and - 730
Flexographic Folder Gluer	6,000 sheets/hr	Latitude 50"x114"	5224	PP3-1227FFG	2014	5224	A.A.C. R18-2-702 and - 730
Rotary Die Cutter	12,000 sheets/hr	SUN 66" x 125"	625HD	497343	2026	N/A	A.A.C. R18-2-702 and - 730
Automated Wax Cascader	2,500 sheets/hr	Andex 60 x 60 Waxing Machine	7700	Prototype built in Australia	1979	7700	A.A.C. R18-2-702 and - 730
Automated Wax Cascader	2,500 sheets/hr	Andex	7710	N/A	2014	7710	A.A.C. R18-2-702 and - 730
Wax Storage Tanks (3)	10,000-gallon each	N/A	N/A	N/A	1988	N/A	A.A.C. R18-2-702 and - 730
Wax Storage Tank	Two 8,000-gallon Chambers	N/A	N/A	N/A	1988	N/A	A.A.C. R18-2-702 and - 730
Wax Storage Tank	35,745 gallons	N/A	N/A	N/A	1988	N/A	A.A.C. R18-2-702 and - 730
Corrugator	1,000 feet/min	United 98" Corrugator	0982	SFM 98-711	1988	0982	A.A.C. R18-2-702 and - 730

ATTACHMENT C: EQUIPMENT LIST

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	INSTALLATION/ MFG. DATE	EQUIPMENT ID NUMBER	A.A.C. / NSPS / NESHAP
Emergency Fire Pump Engine	175 hp	Cummins	V8	N/A	1988	FWP	A.A.C. R18-2-719; 40 CFR 63 Subpart ZZZZ
Starch Silo	200,000 lbs	N/A	N/A	N/A	1988	N/A	A.A.C. R18-2-702 and - 730
Scrap Paper Handling System No. 1	41,055 cfm	N/A	N/A	N/A	1988	16-foot Cyclone	A.A.C. R18-2-702 and - 730
Scrap Paper Handling System No. 2	41,055 cfm	N/A	N/A	N/A	1988	14-foot Cyclone	A.A.C. R18-2-702 and - 730