



Michigan Department of Environmental Quality
Air Quality Division

EFFECTIVE DATE: August 22, 2011

REVISION DATE(S):

ISSUED TO

E.B. EDDY PAPER, INC.
(d/b/a Domtar Industries Inc.)

State Registration Number (SRN): B6420

LOCATED AT

1700 Washington Avenue, Port Huron, Michigan 48061

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B6420-2011

Expiration Date: August 20, 2016

Administratively Complete ROP Renewal Application Due Between, February 19, 2015, and February 19, 2016

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the Permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to PA 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B6420-2011

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to PA 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

Christopher Ethridge, Acting Southeast Michigan District Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **Permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The department is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The Permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a Permit to Install (PTI), are streamlined or subsumed, or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Article II, Chapter 1, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, the Permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. **(R 336.1213(5))**
- Those conditions that are hereby incorporated in a state only enforceable Source-Wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. **(R 336.1213(5)(a), R 336.1214a(5))**
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B6420-2011 pursuant to Rule 201(2)(c) are designated by footnote two. **(R 336.1213(5)(b), R 336.1214a(3))**

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. **(R 336.1213(1)(a))**
2. It shall not be a defense for the 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 ROP. **(R 336.1213(1)(b))**
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. **(R 336.1213(1)(c))**
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities **(R 336.1213(1)(d))**:
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate **(R 336.1213(3)(b))**:
- The date, location, time, and method of sampling or measurements.
 - The dates the analyses of the samples were performed.
 - The company or entity that performed the analyses of the samples.
 - The analytical techniques or methods used.
 - The results of the analyses.
 - The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 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 original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. **(R 336.1213(1)(e), R 336.1213(3)(b)(ii))**

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. **(R 336.1213(3)(c))**
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. **(R 336.1213(4)(c))**
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. **(R 336.1213(4)(c))**
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. **(R 336.1213(3)(c))**
- For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.
22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:

- a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
- a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.
- Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
- a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**
 - d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**

28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaiming, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule. ² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA. ² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDNRE. ² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDNRE, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI. ² **(R 336.1201(4))**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the source-wide terms and conditions that apply to this stationary source. The Permittee is subject to these special conditions for the stationary source in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The Permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no source-wide conditions, this section will be left blank.

C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The Permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The Permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU#5PM	Paper machine No. 5. Major equipment includes conveyors, pulpers, screens, headbox, wire vacuum pumps, presses, steam heated dryer section, size press, calendar stack and reel.	01-01-1928	FGPAPERMACHINES
EU#6PM	Paper machine No. 6. Major equipment includes conveyors, pulpers, screens, headbox, wire, vacuum pumps, presses, natural gas and steam fired dryer section, size press, calendar stack and reel.	01-01-1956	FGPAPERMACHINES
EU#7PM	Paper machine No. 7. Major equipment includes conveyors, pulpers, screens, headbox, wire, vacuum pumps, steam heated dryer section, size press, calendar stack and reel.	01-01-1962/ 10-19-1998	FGPAPERMACHINES
EU#8PM	Paper machine No. 8. Major equipment includes conveyors, pulpers, screens, headbox, wire, vacuum pumps, presses, natural gas and steam fired dryer section, size press, calendar stack and reel, and small natural gas-fired heater for calendar roll oil.	01-01-1969/ 04-09-1998	FGPAPERMACHINES
EUBOILER5	Coal-fired boiler, with backup No. 2 fuel oil firing capability, rated at 196 MMBtu/hr., equipped with natural gas ignition system and electro-static precipitator (ESP) particulate emissions control system.	01-01-1968/ 10-21-1997	FGBOILER5
EUASHHANDLING	Equipment, including cyclones, used to transfer bottom ash and flyash from Boiler No. 5 to the Ash Silo. Ash handling is controlled by an air washer with continuous water spray.	01-01-1968	FGBOILER5
EUASHSILO	Fly ash silo equipped with 6-bag vent filter.	01-01-1968	FGBOILER5

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EUDIESEL1	Diesel-fired emergency generator rated at 9.8 MMBTU/hr	01/01/1988	FGDIESELS
EUDIESEL2	Diesel-fired emergency generator rated at 9.8 MMBTU/hr	01/01/1988	FGDIESELS

D. FLEXIBLE GROUP CONDITIONS

Part D outlines terms and conditions that apply to more than one emission unit. The Permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The Permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FGBOILER5	Coal-fired boiler, with backup No. 2 fuel oil firing capability, rated at 196 MMBtu/hr, equipped with natural gas ignition system & electrostatic precipitator, FGBOILER5 also includes fly ash handling system equipped with a 6-bag vent filter, and fly ash silo equipped with an air washer.	EUBOILER5, EUASHHANDLING, EUASHSILO
FGPAPERMACHINES	Paper Machine Nos. 5, 6, 7, & 8. Machine Nos. 5 & 6 are grandfathered from air use permitting requirements.	EU#5PM, EU#6PM, EU#7PM, EU#8PM
FGDIESELS	Two diesel-fired emergency generators rated at 9.8 MMBTU/hr each.	EUDIESEL1 EUDIESEL2

**FGBOILER5
EMISSION UNIT CONDITIONS**

DESCRIPTION

FGBOILER5 includes a Compliance Assurance Monitoring (CAM) subject power boiler (EUBOILER5), which fires pulverized coal and No. 2 fuel oil (as a backup-fuel) and is equipped with a natural gas ignition system. This flexible group also includes a fly ash handling system (EUASHHANDLING) and a fly ash silo (EUASHSILO).

Emission Units: EUBOILER5, EUASHHANDLING and EUASHSILO

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitator with Wahlco Sulfur Trioxide Flue Gas Conditioning System, Air Washer, and 6-Bag Vent Filter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate	0.28 lbs ²	1,000 lbs of exhaust gases, corrected to 50% excess air	EUBOILER5	Section V. and VI.	R336.1331
2. Particulate	0.10 lbs ²	1,000 lbs. of exhaust gases, calculated on a dry gas basis	EUASHSILO	Section V. and VI.	R331, Table 31, J
3. Particulate	0.10 lbs ²	1,000 lbs. of exhaust gases, calculated on a dry gas basis.	EUASHHANDLING	Section V. and VI.	R331, Table 31, J

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Coal	1.5% Sulfur Content ²	Based on heat value of 12,000 BTU's per pound	EUBOILER5	Section V. and VI.	R336.1401(1)
2. Fuel oil	1.5% Sulfur Content ²	Based on heat value of 18,000 BTU's per pound	EUBOILER5	Section V. and VI.	R336.1401(1)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Permittee shall operate the continuous opacity monitoring system (COMS) installed on EUBOILER5 at all times of normal and abnormal operation, including startup, shutdown and malfunctions. **(R336.1213(3))**
2. Permittee shall keep records of the opacity from EUBOILER5 on a continuous basis with instrumentation acceptable to the Air Quality Division. All data shall be kept on file for a period of 5 years and made available to the Air Quality Division upon request. **(R336.1213(3))**
3. Permittee shall perform an annual audit of the COMS using the procedures set forth in either USEPA publication No. 450/4-92-010, "Performance Audits Procedures for Opacity Monitors", and all amendments thereto, Method 203, Determination of the Opacity of Emissions from Stationary Sources by Continuous Opacity Monitoring Systems, or procedures approved by the District Supervisor of the Air Quality Division. **(R336.1213(3))**
4. Permittee shall not operate the pulverized coal fired boiler EUBOILER5 unless the Wahlco sulfur trioxide flue gas conditioning system and the electrostatic precipitator are installed, maintained, and operating properly. **(R336.1401(1), R336.1910)**
5. Permittee shall not substitute any fuel in the ignition system for EUBOILER5 for that described in the permit application which would result in an appreciable change in the quality or any appreciable increase in the quantity of the emission of an air contaminant without prior notification to and approval by the AQD. ² **(R336.1201(3))**
6. Permittee shall not operate the EUBOILER5 controlled by electrostatic precipitator unless each transformer-rectifier set of the electrostatic precipitator is equipped with a silicon-controlled rectifier linear reactor. ² **(R336.1330(1))**

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Within 180 days of the issuance of this Renewable Operating Permit, Permittee shall conduct particulate emission tests of EUBOILER5 at Permittee's expense. The test shall be performed per Reference Method 5 – Determination of particulate matter from stationary sources. **(R336.1213(3)(a), R336.2001(1)(e), R 336.2003(1))**
2. Permittee shall submit to the Air Quality Division, District Supervisor for approval at least 30 days prior to the anticipated particulate emission test date, a complete test protocol. **(R 336.1213(3))**
3. Permittee shall notify the AQD, District Supervisor no less than 7 days prior to the anticipated test date. ² **(R 336.2001(3))**
4. All test methods and procedures must be approved by the AQD prior to testing. **(R 336.1213(3)(a), R336.2003, R 336.2004)**
5. Testing/sampling records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall obtain and keep records of the sulfur content of the coal and fuel oil burned in EUBOILER5, as detailed in Appendix 4. **(R336.1213(3))**
2. Permittee shall conduct all required monitoring per the AQD-approved Compliance Assurance Monitoring (CAM) Plan and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9. ² **(40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
3. Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. Permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. ² **(40 CFR 64.7)**
4. Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). ² **(40 CFR 64.9(b))**
5. Permittee shall perform a non-certified visible emission observation of EUASHHANDLING and EUASHSILO stacks (SVASHHANDLINGAIRWASHER & SVASHSILO6BAGVENTFILTER) at least once every seven days during routine operating conditions. Permittee shall initiate corrective action upon observation of excessive visible emissions and shall maintain a written record of each required observation and corrective action. **(R336.1213(3))**

See Appendix 3 and 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. The results of the annual audit referenced in Paragraph No. III.3, above, shall be submitted to the District Supervisor within 60 days of completion. Further, all monitoring data shall be kept on file for a period of at least 5 years and made available to the District Supervisor upon request. **(R336.1213(3)(b)(ii))**
5. Semiannual COMS reporting using the format in Appendix 8 or an alternate format approved by the AQD, District Supervisor. Due March 15 for reporting period July 1 to December 31, and September 15 for reporting period January 1 to June 30. **(R336.1213(3)(c)(iii))**

6. Permittee shall submit to the AQD District Supervisor, within 60 days following performance of the particulate emission test, a complete test report establishing the compliance status of EUBOILER5 with the particulate emission limits. **(R 336.1213(3)(c), R 336.2001(4))**
7.
 - a. Each semi-annual report of monitoring and deviations shall include summary information on the number, duration, and cause of excursions/exceedances and the corrective actions taken. If there were no excursions/exceedances in the reporting period, then this report shall include a statement that there were no excursions/exceedances. **(R336.1213(3)(c)), 40 CFR 64.9(a)(2)(i))**
 - b. Each semi-annual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. **(R336.1213(3)(c)), 40 CFR 64.9(a)(2)(ii))**
 - c. Each semi-annual report of monitoring and deviations shall include a description of the actions taken to implement a QIP during the reporting period (if appropriate). If a QIP has been completed, the report shall include documentation that the plan has been implemented and if it has reduced the likelihood of excursions or exceedances. **(R336.1213(3)(c)), (40 CFR 64.9(a)(2)(iii))**

See Appendix 2 & 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SVBOILER5	59 ²	135 ²	R336.1201(3)
2. SVASHHANDLINGAIRWASHER	NA	NA	R336.1201(3)
3. SVASHSILO6BAGVENTFILTER*	NA	NA	R336.1201(3)

* SVASHSILO6BAGVENTFILTER discharges horizontally and is equipped with a rain cap

IX. OTHER REQUIREMENT(S)

1. Permittee shall implement the approved Compliance Assurance Monitoring (CAM) Plan for EUBOILER5. Changes to the plans may be made upon written approval by the District Supervisor, AQD.² **(40 CFR 64.7(a), R336.1911)**
2. Permittee shall, at all times, maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.² **(40CFR 64.7(b))**
3. Permittee shall comply with all requirements of 40 CFR Part 64 (CAM).² **(40 CFR64.6(c)(3))**
4. Permittee shall, upon detecting an excursion or exceedance, restore operation of EUBOILER5 to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.² **(40CFR 64.7(d))**
5. Permittee shall notify the appropriate District Office of the AQD for the need to modify the monitoring plan if the approved monitoring is found to be inadequate and shall submit a proposed modification to the plan if appropriate.² **(40 CFR 64.7(e))**

6. Permittee shall submit a Quality Improvement Plan (QIP) at the request of the AQD District Supervisor, pursuant to the provisions of 40 CFR 64.8(a).² **(R336.1213(3)),40 CFR 64.8(a)**
7. Permittee shall not operate EUASHHANDLING and EUASHSILO unless the installed air washer and 6-bag vent filter are maintained, and operated properly.¹ **(R336.1910)**
8. Permittee shall keep a log or checklist, for all air cleaning devices to assure that the air cleaning devices are installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control Rules and existing law. Permittee shall keep records of problems found, repairs done and/or corrective action taken, and scheduled and completed maintenance on the air cleaning devices.¹ **(R336.1213(3), R336.1910)**

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

**FGPAPERMACHINES
FLEXIBLE GROUP CONDITIONS**

DESCRIPTION

Paper Machine Nos. 5, 6, 7, & 8, Machine Nos. 5 & 6 are grandfathered from air use permitting requirements.

Emission Units: EU#5PM, EU#6PM, EU#7PM, EU#8PM

POLLUTION CONTROL EQUIPMENT

NA.

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. VOC	5.3 lbs ²	Hourly	EU#7PM	Section V. and VI.	R336.1702(a)
2. VOC	1.9 tons ²	Monthly	EU#7PM	Section V. and VI.	R336.1702(a)
3. VOC	23.2 tons ²	12-month rolling time period	EU#7PM	Section V. and VI.	R336.1702(a)
4. 1,2-dibromo-2,4 dicyanobutane	0.47 lbs ²	Hourly	EU#7PM	Section V. and VI.	R336.1201(3)
5. VOC	17.1 lbs ²	Hourly	EU#8PM	Section V. and VI.	R336.1702(a)
6. VOC	4.2 tons ²	Monthly	EU#8PM	Section V. and VI.	R336.1702(a)
7. VOC	26.2 tons ²	12-month rolling time period	EU#8PM	Section V. and VI.	R336.1702(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA					

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Upon written request of the AQD District Supervisor, the volatile organic compound content of each coating containing VOC shall be determined using current manufacturer's data, provided the manufacturer used EPA Federal Reference Test Method 24, or an equivalent method deemed appropriate by AQD, as the basis for the determination. **(R336.1213(3))**

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of 5 years. **(R 336.1213(3)(b)(ii))**

1. Permittee shall keep a daily record of the following, associated with the operation of EU#7PM and EU#8PM: **(R336.1213(3))**
 - a) Usage rate of each paper additive containing VOC.
 - b) Pounds of VOC per gallon of each additive.
 - c) Pounds of 1,2-dibromo-2,4 dicyanobutane per pounds of each additive (EU#7PM only).
 - d) Tons of paper produced based on 12 months rolling time period.
 - e) Hours of operation.
2. Permittee shall maintain a current listing from the manufacturer of the VOC content of each paper additive. The data may consist of Material Safety Data Sheets, manufacturer's formulation data, or both as deemed acceptable by the AQD District Supervisor. All records shall be kept on file for a period of at least five years and made available to the Department upon request. **(R336.1213(3))**

See Appendix 4

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD's District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Monthly computation of the total VOC emissions and the 12 month rolling time period VOC emission rate associated with EU#7PM and EU#8PM, each of those calculations based on the monthly usage of each VOC-containing paper additive, shall be submitted in an acceptable format semiannually, received by appropriate AQD district office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R336.1213(3))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV#7PM-WET-END *	40 ²	40 ²	R336.1201(3)
2. SV#7PM-ECONOMIZ	36 ²	62 ²	R336.1201(3)
3. SV#7PM-DRY-END *	42 ²	42 ²	R336.1201(3)
4. SV#7PM-VAC-PUMP	28 ²	40 ²	R336.1201(3)
5. SV#7PM-AFTER-DRY *	42 ²	42 ²	R336.1201(3)
6. SV#8PMYANKEE	46 ²	100 ²	R336.1201(3)
7. SV#8PMAFTERDRYER	40 ²	76 ²	R336.1201(3)
8. SV#8PM2NDAFTERDR*	22 x 10 ²	47 ²	R336.1201(3)
9. SV#8PMNORTHVAC	30 ²	74 ²	R336.1201(3)
10. SV#8PMSOUTHVAC	18 ²	74 ²	R336.1201(3)
11. SVSTARCHSILO	NA	NA	R336.1201(3)

* SV#7PM-WET-END, SV#7PM-DRY-END, SV#7PM-AFTER-DRY and SV#8PM2NDAFTERDR are horizontal stacks with horizontal discharge.

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state-only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

FGDIESELS FLEXIBLE GROUP CONDITIONS
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DESCRIPTION

This group consists of two existing, on-site, stationary diesel-fired internal combustion engines rated at 9.8 MMBTU/hr (3,838 HP) each. The engines are used for emergency/back-up electric generation and are subject to 40 CFR Part 63, Subpart ZZZZ, National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE).

Emission Units: EUDIESEL1 & EUDIESEL2

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Fuel oil	1.5% Sulfur Content ²	Based on heat value of 18,000 BTU's per pound	EUDIESEL1 EUDIESEL2	Section VI.	R336.1401(1)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. NA

See Appendix 5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. The permittee shall maintain a record of the size, installation date, hours of operation and type of operation of the unit to demonstrate compliance with 40 CFR 63.6590(b)(3). **(40 CFR 63.6590(b)(3))**
2. Permittee shall obtain and keep records of the sulfur content of the fuel oil burned in EUDIESEL1 and EUDIESEL2, as detailed in Appendix 4. **(R336.1213(3))**

See Appendices 3, 4, and 7

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. Permittee shall not operate any emergency electrical generator covered in this flexible group for more than 500 hours per year. **(R336.1213(3))**
2. Permittee shall operate the emergency generators for emergency use only, except for no more than 50 hours per year of non-emergency use in addition to routine testing and maintenance, maintenance checks, and required readiness testing. **(40 CFR 63.6675, R 336.1213(3))**
3. The permittee shall comply with the applicable requirements of 40 CFR Part 63 (“National Emission Standard for Hazardous Air Pollutants for Source Categories”), Subparts A (“General Provisions”) and ZZZZ (“National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines”). **(40 CFR Part 63, Subparts A and ZZZZ)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that the requirements identified in the table below are not applicable to the specified emission unit(s) and/or flexible group(s). This determination is incorporated into the permit shield provisions set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii). If the permittee makes a change that affects the basis of the non-applicability determination, the permit shield established as a result of that non-applicability decision is no longer valid for that emission unit or flexible group.

Emission Unit/Flexible Group ID	Non-Applicable Requirement	Justification
EUBOILER2	40 CFR Part 60 Subpart Dc	The boiler was installed prior to June 9, 1989 and has not been modified.
EUBOILER4	40 CFR Part 60 Subpart Dc	The boiler was installed prior to June 9, 1989 and has not been modified.
EUBOILER5	40 CFR Part 60 Subpart Db	The boiler was installed prior to June 19, 1984 and has been modified, however major modification dates were before 1984 and the modification in 1997, covered under PTI No.106-77B, does not constitute "modification" nor "reconstruction" under 60.14 and 60.15 and is therefore exempt from 40 CFR Part 60 Subpart Db. In addition, 40 CFR Part 60.40b(j) states, in pertinent part, that any affected facility otherwise (sic) meeting the applicability requirements under 40 CFR Part 60.40b(a) and commencing construction, modification, or reconstruction after June 19, 1986 is not subject to Subpart D (Standards of Performance for Fossil-Fuel-Fired Steam Generators, §60.40).
EUBOILER6	40 CFR Part 60 Subpart Dc	The boiler was installed after June 9, 1989, however, the unit fires with natural gas only and therefore is exempt from the standards for sulfur dioxide and particulate matter emissions within 40 CFR Part 60 Subpart Dc.

APPENDICES

Appendix 1: Abbreviations & Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acfm	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H ₂ S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO ₂	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfuction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

Appendix 2. Schedule of Compliance

The Permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the Permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (R 336.1213(4)(a), R 336.1119(a)(ii))

Appendix 3. Monitoring Requirements

Specific monitoring requirement procedures, methods or specifications are detailed in Part A or the appropriate source-wide, emission unit and/or flexible group special conditions.

The following details the facility’s compliance with the 40 CFR 64, Compliance Assurance Monitoring (CAM) CAM Plan requirement, associated with FGBOILER5, submitted by the Company and approved by its inclusion in MI-ROP-B6420-201X.

Compliance Assurance Monitoring (CAM) Plan

E. B. Eddy Paper, Inc., Port Huron (d.b.a Domtar Industries Inc.) Boiler 5 Electrostatic Precipitator

I. BACKGROUND

Emission Unit

Description: One 196 MMBtu/hr coal/fuel oil fired utility boiler (Unit #5)

Identification: EUBOILER5 (Unit #5)

Facility: E.B. Eddy Paper, Inc.
(d/b/a Domtar Industries Inc.)
1700 Washington Ave
Port Huron MI 48060

Applicable Regulation, Emission Limit, Monitoring Requirements

Renewable Operating Permit No: MI-ROP-B6420-201X

Emission Limits:

Particulate Matter 0.28 lbs. per 1,000 lbs of exhaust gas, Rule 331(1)(c)

Opacity 20% opacity based on 6-minute average, except for one 6-minute average per hour of not more than 27% opacity, Rule 301

Monitoring requirements: Continuous opacity monitoring using a Continuous Opacity Monitoring System (COMS)

Control Technology

An electrostatic precipitator (ESP) is installed on the unit. Pre-control potential emissions of PM are more than 560 tons annually. Efficiency rate of the ESP exceeds 95%.

II. MONITORING APPROACH

The key elements of the monitoring approach for PM are presented in Table 1. Opacity will be used as the primary performance indicator for demonstrating compliance with the PM mass emission limit.

Table 1. Monitoring Approach

	COMS Opacity
A. Indicator	Visible emissions (Opacity) will be monitored continuously by a certified COMS installed in the stack for boiler 5.
B. Indicator Range	An excursion is defined as any continuous two-hour duration exceeding 20%. Excursions trigger an investigation, corrective action and reporting requirement.

III. PERFORMANCE CRITERIA

Table 2 Performance Criteria

	Visible Emissions (Opacity)
A. Data Representativeness	Measurements are made in the discharge stack. The 40CFR60, Appendix B, PS-1 certified opacity monitor is correlated to the stack exit diameter to provide 6-minute average opacity indications.
B. Verification of Operational Status	Daily zero and calibration.
C. QA/QC Practices and Criteria	Routine preventative maintenance and an annual monitor audit.
D. Monitoring Frequency	Continuous (Six-minute averages based on 24 or more equally spaced instantaneous opacity measurements per 6-minute period).
E. Data Collection Procedure	Continuously recorded by data acquisition system and maintained for five years.
F. Averaging Period	Six minute averages.

IV. JUSTIFICATION

Rationale for Selection of Performance Indicator

Opacity was selected as a performance indicator because it is indicative of good operation and maintenance of the precipitators. When a precipitator is operating properly, there will be minimal opacity from the stack of boiler #5. Particulate emission test results historically indicate that the emission rate is well below the particulate limit when the stack opacity is at or below 20%.

Stack opacity is controlled with the implementation of a Malfunction Abatement Plan approved by the Air Quality Division, District Supervisor.

The Malfunction Abatement Plan assures that the ESP is operating normally by monitoring important operating parameters on daily basis. These checks are documented and abnormal conditions are reported to the team leader who ensures corrective actions are taken. Specified routine preventative maintenance activities are

performed on a quarterly basis and major preventative maintenance activities are performed annually during the major scheduled maintenance outage.

The Malfunction Abatement Plan also specifies operator actions to minimize emissions during various operating scenarios such as startup/shutdown and malfunction modes, normal operation and specific operating scenarios that often have an effect on opacity, such as increasing boiler load. Operator actions to minimize emission during normal operation include basic actions such as responding to opacity alarms and taking corrective action to minimize emissions. During startup and shutdown and malfunctions, the operator is required to follow a predetermined sequential list of actions aimed at emission minimization.

To assure proper operation of the ESP, the Malfunction Abatement Plan is followed. This plan ensures that the continuous opacity monitoring system is calibrated, maintained and operated properly.

Rationale for Selection of Indicator Range

The selected indicator range is two continuous hours exceeding 20% opacity. This indicator is consistent with the excess emission reporting requirement of Michigan Rule 912.

Performance Test

Particulate emission testing was completed on EUBOILER5 in September 1989 and in August 2006. Emissions reports were submitted to the AQD for both tests. The results of both PM tests indicate that the emission levels are well below the emission limit. Results from the August 2006 test show that the average emission rate of EUBOILER5 was 0.07 lbs/1000 lbs gas flow, corrected to 50% excess air. Any future particulate emission testing will be submitted to the AQD and will be kept on file for five years.

Appendix 4. Recordkeeping

1. Daily recordkeeping for EU#7PM and EU#8PM shall be in tabular form, and shall contain the following information for each of EU#7PM and EU#8PM: **(R336.1213(3))**
 - a) Date of record
 - b) Identification of each VOC-containing paper additive used
 - c) VOC emission rate in pounds per hour recorded daily
 - d) VOC emission rate in tons per month, totaled and recorded for each month
 - e) VOC emission rate in tons per year based on a 12-month time period, determined and recorded at the end of each month
2. Coal Analysis (EUBOILER5) **(R336.1213(3))**
 - a) For each coal shipment received, the Permittee shall obtain from the coal supplier a laboratory analysis of the ash content, sulfur content, moisture content, and heat value to demonstrate compliance with the 1.5% sulfur content limitation. The determination of sulfur content (percent by weight) of fuel shall be carried out in accordance with a procedure acceptable to the Air Quality Division. For each coal delivery, the Permittee shall record the date received, source of coal and shipper, and tons received. These records shall be retained by the Permittee for a minimum of 5 years, and made available to the Air Quality Division upon request.
 - b) At least once per calendar year, the Permittee shall have a coal analysis performed of the ash content, sulfur content, moisture content, and heat value. This analysis shall be independent of the analysis received from the coal supplier with each coal delivery. The determination of sulfur content (percent by weight) of fuel shall be carried out in accordance with ASTM Method 3177-75 or Method 4239-85 or other method as approved by the District Supervisor. These records shall be retained by the Permittee for a minimum of 5 years, and made available to the Air Quality Division upon request.
3. Fuel Oil Analysis (EUBOILER5 & FGDIESELS) **(R336.1213(3))**

For each fuel oil shipment received, the Permittee shall demonstrate that the sulfur content of the fuel oil obtained is in compliance with the sulfur content limitation by means of documented requisitions of purchase orders and supplier invoices which state that the sulfur content of the fuel oil is less than the 1.5% sulfur content limitation. Upon request of the Air Quality Division, the Permittee shall obtain from the fuel oil

supplier laboratory analyses of the sulfur content of the fuel oil. The determination of the sulfur content shall be carried out in accordance with ASTM Method D129-64 or ASTM Method 1552-83 or ASTM Method 2622-87 or other method as approved by the District Supervisor. For each fuel oil delivery, the Permittee shall record the date received, source of fuel oil and supplier, and gallons received. These records shall be retained by the Permittee for a minimum of 5 years, and made available to the Air Quality Division upon request.

Appendix 5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 6. Permits to Install

The following table lists any Permits to Install issued since the effective date of previously issued ROP No. MI-ROP-B6420-2006a:

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
NA	NA	NA

Appendix 7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The Permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting section of the source-wide, emission unit and/or flexible group special conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

The Permittee shall summarize excess emissions and COMS performance using the following format unless an alternative method is approved by the AQD District Supervisor.

EXCESS EMISSIONS SUMMARY REPORT FOR EUBOILER5

Reporting Period

From: _____

To: _____

Excess Opacity Summary	
Excess Emission Reason(s):	_____
Duration:	_____
Total Duration In This Period (hrs):	_____
Total Percent Of Time In Excess:	_____

Continuous Opacity Monitor Performance Summary	
Down Time Reason:	_____
Duration:	_____
Total CMS Down Time In This Period (hrs):	_____
Total Percent Of Operating Time CEMS Out Of Service:	_____

Name: _____ Title: _____

Signature _____ Date: _____

Appendix 9. Malfunction Abatement Plan

Permittee shall implement and maintain a Malfunction Abatement Plan (MAP) for EUBOILER5. An approved MAP, dated March 28, 2011, was submitted to the Southeast Michigan District Supervisor. The approved MAP covers the boiler system, electrostatic precipitator (ESP) air pollution control equipment, a granular sulfur gas conditioning system, and a Continuous Opacity Monitor System (COMS). Any modifications to the MAP shall be submitted to the AQD District Supervisor for approval, and are subject to review and approval by the AQD. Records in support of the activities required by the plan shall be maintained. These records shall be made available upon inspection of the facility, or as otherwise requested by the AQD. **(R336.1213(3))**