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AIR POLLUTION CONTROL PERMIT
ATTAINMENT AREA MAJOR SOURCE

EI FACILITY NO. 445031180 PERMIT NO. 86-SJK-072

STACK NO.(S). S7, S8, S9, S10 TYPE: Permit to Operate

SOURCE NO.(S). B7, B8, B9, B10, B11

THIS OPERATING PERMIT IS PERMANENT UNLESS ALTERED, REVOKED OR SUSPENDED.

In compliance with the provisions of Chapter 144, Wis. Stats., and Chapters NR 400 to NR 499, Wis. Adm. Code,

Name of Source: Thilmany Pulp and Paper Company

Street Address: Thilmany Road
Kaukauna, WI 54130

Principal Officer or Authorized Representative, & Title:
Mr. Thomas Jayne, Manager - Technical Services

is authorized to operate five industrial boilers described in the plans and specifications dated September 29, 1984; November 28, 1984; February 26, 1985; March 1, 1985 (EOP Request); April 18, 1985; June 14, 1985; November 21, 1985; December 21, 1985; May 14, 1986; July 25, 1986; July 29, 1986; November 18, 1986; November 20, 1986; December 12, 1986; January 15, 1987; January 16, 1987; April 15, 1987 and May 18, 1987 in conformity with the conditions herein.

This authorization requires compliance by the permit holder with the emission limitations, monitoring requirements and other terms and conditions set forth in Parts I and II hereof.

Dated at Madison, Wisconsin this 28th day of July, 1987.

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By Michael E. DeBrock for
Donald F. Theiler, Director
Bureau of Air Management

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PART I
SPECIFIC PERMIT CONDITIONS

A. Specific Emission Limitations

1. 122.6 Million BTU Per Hour Waste Heater Boiler No. B7, Stack No. S7

<u>Pollutant</u>	<u>Applicable Wisconsin Adm. Code, or Statute</u>	<u>Limitation/Requirement</u>
Particulate	Section NR 415.06(1)(b), Wis. Adm. Code	0.30 pounds per million BTU heat input, and 36.8 pounds per hour
Sulfur Dioxide	Section NR 417.07, Wis. Adm. Code	92.7 pounds per hour averaged over any consecutive 24-hour period*
Nitrogen Oxides	Section NR 428.03, Wis. Adm. Code	48.7 pounds per hour as nitrogen dioxide averaged over any consecutive 3-hour period**
Carbon Monoxide	Section NR 426.025, Wis. Adm. Code	19.4 pounds per hour averaged over any consecutive 3-hour period**
Organic Compounds	Section NR 419.03(1), Wis. Adm. Code	24.5 pounds per hour as methane averaged over any consecutive 3-hour period**
Visible Emissions	Section NR 431.05(1)(a), Wis. Adm. Code	20% opacity

* This sulfur dioxide limitation was developed as an alternate emission limit under Sec. NR 417.07(5), Wis. Adm. Code.

** This limitation is set in order to document the maximum emissions and avoid air pollution.

2. 206.3 Million BTU Per Hour Kraft Recovery Boiler No. B8, Stack No. S8

<u>Pollutant</u>	<u>Applicable Wisconsin Adm. Code, or Statute</u>	<u>Limitation/Requirement</u>
Particulates	Section NR 415.06(1)(b), Wis. Adm. Code	0.30 pounds per million BTU heat input, and 61.9 pounds per hour.
Sulfur Dioxide	Section NR 417.07, Wis. Adm. Code	466.3 pounds per hour averaged over any consecutive 24-hour period*
Nitrogen Oxides	Section NR 428.03, Wis. Adm. Code	45.7 pounds per hour as nitrogen dioxide averaged over any consecutive 3-hour period**
Carbon Monoxide	Section NR 426.025, Wis. Adm. Code	471.5 pounds per hour averaged over any consecutive 3-hour period**
Organic Compounds	Section NR 419.03(1), Wis. Adm. Code	40.5 pounds per hour as methane averaged over any consecutive 3-hour period**
Total Reduced Sulfur	Sec. NR 417.06(1), Wis. Adm. Code	0.5 pounds (as sulfur) per equivalent ton of air-dried Kraft pulp, or 17.5 parts per million dry volume (as hydrogen sulfide), whichever is more restrictive.
Visible Emissions	Sec. NR 431.05(1)(a), Wis. Adm. Code	20% opacity

* The combined sulfur dioxide emissions from Boiler No. B8, Stack No. S8 and Boiler No. B10, Stack No. S10 shall not exceed 466.3 pounds per hour as averaged over any consecutive 24-hour period. This sulfur dioxide limitation was developed as an alternate emission limit under Sec. NR 417.07(5), Wis. Adm. Code.

** This limitation is set in order to document the maximum emissions and avoid air pollution. This limitation applies to the combined emissions from Kraft recovery boilers Nos. 8 and 10.

3. 192.4 Million BTU Per Hour Cyclone Boiler No. B9, Stack No. S9.

<u>Pollutant</u>	<u>Applicable Wisconsin Adm. Code, or Statute</u>	<u>Limitation/Requirement</u>
Particulate	Sec. NR 415.06(1)(b), Wis. Adm. Code	0.30 pounds per million BTU heat input, and 57.7 pounds per hour
Sulfur Dioxide	Sec. NR 417.07, Wis. Adm. Code	7.0 pounds per million BTU heat input averaged over any consecutive 24 hour period, 5.5 pounds per million BTU heat input averaged over any consecutive 30 day period, and 3,865.4 pounds per hour averaged over any consecutive 24-hour period*
Nitrogen Oxides	Section NR 428.03, Wis. Adm. Code	727.5 pounds per hour as nitrogen dioxide averaged over any consecutive 3-hour period**
Carbon Monoxide	Section NR 426.025, Wis. Adm. Code	83.6 pounds per hour averaged over any consecutive 3-hour period**
Visible Emissions	Sec. NR 431.05(1)(a), Wis. Adm. Code	20% opacity

* The combined sulfur dioxide emissions from Boiler No. B9, Stack No. S9 and Boiler No. B11, Stack No. S9 shall not exceed 3865.4 pounds per hour as averaged over any consecutive 24-hour periods if the height of the stack exhausting these emissions is 290 feet or higher. Combined emissions shall not exceed 1.7 pounds per million BTU heat input if the stack height is between 175 and 290 feet. This sulfur dioxide limitation was developed as an alternate emission limit under Sec. NR 417.07(5), Wis. Adm. Code.

** This limitation is set in order to document the maximum emissions and avoid air pollution. This limitation applies to the combined emissions from cyclone boilers Nos. 9 and 11.

4. 321.7 Million BTU Per Hour Kraft Recovery Boiler No. B10, Stack No. S10

<u>Pollutant</u>	<u>Applicable Wisconsin Adm. Code, or Statute</u>	<u>Limitation/Requirement</u>
Particulate	Sec. NR 415.06(1)(b), Wis. Adm. Code	0.30 pounds per million BTU heat input, and 96.5 pounds per hour
Sulfur Dioxide	Sec. NR 417.07, Wis. Adm. Code	466.3 pounds per hour averaged over any consecutive 24-hour period*
Nitrogen Oxides	Section NR 428.03, Wis. Adm. Code	45.7 pounds per hour as nitrogen dioxide averaged over any consecutive 3-hour period**
Carbon Monoxide	Section NR 426.025, Wis. Adm. Code	471.5 pounds per hour averaged over any consecutive 3-hour period**
Organic Compounds	Section NR 419.03(1), Wis. Adm. Code	40.5 pounds per hour as methane averaged over any consecutive 3-hour period**
Total Reduced Sulfur	Sec. NR 417.06(1), Wis. Adm. Code	0.5 pounds (as sulfur) per equivalent ton of air-dried Kraft pulp, or 17.5 parts per million dry volume (as hydrogen sulfide), whichever is more restrictive.
Visible Emissions	Sec. NR 431.05(1)(a), Wis. Adm. Code	20% opacity

* The combined sulfur dioxide emissions from Boiler No. B8, Stack No. S8 and Boiler No. B10, Stack No. S10 shall not exceed 466.3 pounds per hour as averaged over any consecutive 24-hour period. This sulfur dioxide limitation was developed as an alternate emission limit under Sec. NR 417.07(5), Wis. Adm. Code.

** This limitation is set in order to document the maximum emissions and avoid air pollution. This limitation applies to the combined emissions from Kraft recovery boilers Nos. 8 and 10.

5. 379 Million BTU Per Hour Cyclone Boiler No. B11, Stack No. S9

<u>Pollutant</u>	<u>Applicable Wisconsin Adm. Code, or Statute</u>	<u>Limitation/Requirement</u>
Particulate	Sec. NR 415.06(1)(b), Wis. Adm. Code	0.30 Pounds per million BTU heat input, and 113.7 pounds per hour
Sulfur Dioxide	Sec. NR 417.07, Wis. Adm. Code	7.0 pounds per million BTU heat input averaged over any consecutive 24-hour period, 5.5 pounds per million BTU heat input averaged over any consecutive 30 day period, and 3,865.4 pounds per hour averaged over any consecutive 24-hour period*
Nitrogen Oxides	Section NR 428.03, Wis. Adm. Code	727.5 pounds per hour as nitrogen dioxide averaged over any consecutive 3-hour period**
Carbon Monoxide	Section NR 426.025, Wis. Adm. Code	83.6 pounds per hour averaged over any consecutive 3-hour period**
Visible Emissions	Sec. NR 431.05(1)(a), Wis. Adm. Code	20% opacity

* The combined sulfur dioxide emissions from Boiler No. B9, Stack No. S9 and Boiler No. B11, Stack No. B9 shall not exceed 3,865.4 pounds per hour as averaged over any consecutive 24-hour period if the height of the stack exhausting these emissions is 290 feet or higher. Combined emissions shall not exceed 1.7 pounds per million BTU heat input if the stack height is between 175 and 290 feet. This sulfur dioxide limitation was developed as an alternate emission limit under Sec. NR 417.07(5), Wis. Adm. Code.

** This limitation is set in order to document the maximum emissions and avoid air pollution. This limitation applies to the combined emissions from Kraft recovery boilers Nos. 9 and 11.

B. Other Specific Conditions

1. Waste heat boiler No. B7 shall only burn wood waste, paper broke, #6 fuel oil, natural gas and solvent vapors from Akrosil silicone coater P61 as fuel.
2. Kraft recovery boiler No. B8 shall only burn Kraft pulping liquor, #6 fuel oil and natural gas as fuel.
3. Cyclone boiler No. B9 shall only burn bituminous coal, paper broke, #6 fuel oil, natural gas and solvent vapors from Akrosil silicone coater P61 as fuel.
4. Kraft recovery boiler No. B10 shall only burn Kraft pulping liquor, #6 fuel oil and natural gas as fuel.
5. Cyclone boiler No. B11 shall only burn bituminous coal, #6 fuel oil, #2 fuel oil, natural gas and paper broke as fuel.
6. The sulfur content of the coal burned in Boiler Nos. 9, 10 and 11 shall not exceed 4.4 percent by weight.
7. The sulfur content of the #6 fuel oil burned in Boiler Nos. 7, 8, 9, 10 and 11 shall not exceed 2.5 percent by weight.

Compliance Demonstration

8. Source performance tests shall be conducted within 120 days after the issuance of this permit to prove compliance with the particulate limitations for Boiler No. 7 burning bark and broke, and the sulfur dioxide and total reduced sulfur limitations for Boiler Nos. 8 and 10 burning Kraft liquor. The Department shall be informed at least 10 working days prior to the tests so a Department representative can witness the testing. At the time of notification, a stack test plan following the provisions set forth in Section NR 439.05, Wis. Adm. Code, shall also be submitted for approval.

Two copies of the report on the tests shall be submitted to the Department for evaluation within 30 days after the tests.

9. By December 31, 1987, Thilmany Pulp & Paper Company shall install a continuous emission monitor on stack No. S9 exhausting boiler Nos. 9 and 11. This monitor shall be capable of continuously measuring and recording the sulfur dioxide emissions from these boilers to determine compliance with the limits (pounds per hour and pounds per million BTU heat input) contained in Part A of this permit.

This monitor shall be installed, calibrated and maintained as described in Performance Specification 2, 40 CFR Part 60, Appendix B.

10. Thilmany Pulp & Paper Company shall install continuous fuel monitors on boiler Nos. 7, 8 and 10 for natural gas, #2 fuel oil, #6 fuel oil and Kraft liquor. Thilmany shall keep daily records of all fuels consumed in Boiler Nos. 7, 8 and 10 and the daily hours of operation for each boiler.

11. Every month, Thilmany Pulp & Paper Company shall calculate and record the daily average sulfur dioxide emission rate in units of pounds per hour and pounds per million BTU for Boiler Nos. 9 and 11 and units of pounds per hour for Boiler Nos. 7, 8 and 10. Average hourly boiler sulfur dioxide emissions shall be calculated for each boiler by dividing total sulfur dioxide emissions for each day by the hours of boiler operation for that day. These emission records shall be kept available for inspection by Department personnel for two years.
12. Compliance with the sulfur dioxide control requirements contained in this permit for Boiler Nos. B9 and B11, shall be attained by December 31, 1987. All other requirements contained in this permit are effective immediately.

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PART II
GENERAL PERMIT CONDITIONS
FOR DIRECT STATIONARY SOURCES

A. Scope

This permit is valid only for the structure, building, facility, equipment or operations specifically identified herein. All emissions authorized hereby shall be consistent with the terms and conditions of Parts I and II of this permit.

B. Prevention of Air Pollution

No person may cause, allow or permit the emissions of any air contaminant into the ambient air from a source subject to this permit which substantially contribute to the exceeding of an air standard or which cause air pollution.

C. Notification Requirements

Pursuant to sec. 144.394(3), Wis. Stats. and sections NR 445.05 and 439.025(6), Wis. Adm. Code, the Department shall be notified of the following events:

<u>Event</u>	<u>Timing</u>
Hazardous substance air spill	Immediate-call: (608)266-3232
Malfunction or event not reported in advance which causes or may cause any violation of an emission limitation.	Within 8 hours of onset
Noncompliance with any other condition specified in this permit noncompliance, cause, duration, and steps taken to prevent reoccurrence.	Written notification within 5 days identifying steps taken to prevent reoccurrence.

D. Advance Notice of Startup or Shutdown

The permittee shall report to the Department in advance schedules for planned shutdown and startup of air pollution control equipment and the measures to be taken to minimize the down time of the control equipment. Scheduled maintenance or startup of other equipment which causes an emission limit to be exceeded shall also be reported in advance to the Department. Advance reporting pursuant to this permit condition or sec. NR 439.025(8), Wis. Adm. Code, shall not relieve any person from the duty to comply with any applicable emission limitations.

E. Right of Entry

Pursuant to sec. 144.34, Wis. Stats., the permittee shall allow authorized representatives of the Department of Natural Resources to enter upon the permittee's premises; to have access to and copy any records required to be kept under the terms and conditions of this permit; and to make any inspection necessary to ascertain compliance.

F. Malfunction Prevention and Abatement Plans

Pursuant to sec. NR 439.09, Wis. Adm. Code, the owner or operator of any direct or portable source which may emit hazardous substances or emits more than 15 pounds in any day or 3 pounds in any hour of carbon monoxide, particulate matter, hydrocarbons, sulfur oxides, nitrogen dioxide or photochemical oxidants shall prepare a written malfunction prevention and abatement plan to prevent, detect and correct malfunctions or equipment failures which may cause any emission limitation to be violated or which may cause air pollution. Any such plan shall be carried out by the owner or operator. The plan shall be updated as needed and is subject to Department review, approval and amendment.

G. Emission Control Action Programs

Pursuant to sec. NR 493.04, Wis. Adm. Code, if the source(s) covered by this permit emits 0.25 tons per day or more of carbon monoxide, particulate matter, hydrocarbons, sulfur oxides, nitrogen dioxide or photochemical oxidants, the permittee shall prepare an emission control action program consistent with good industrial practice and safe operating procedures, for reducing the emission of air contaminants into the outdoor atmosphere during periods of an air pollution alert, air pollution warning or air pollution emergency. The emission control action program shall be in writing, available on the premises for inspection and subject to review and approval by the Department on request.

H. Permit Alteration, Revocation, Suspension

After notice and opportunity for a hearing, as provided in sec. 144.395, Wis. Stats., this permit may be altered, suspended, or revoked in whole or in part for cause. Circumstances which could result in alteration of the permit include but are not limited to the following:

1. A significant or recurring violation of any term or condition of this permit;
2. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
3. A change in any applicable rule.

In addition to the circumstances in 1. and 2., failure to pay any required permit fees may result in revocation or suspension.

I. Civil Liability

Nothing in this permit shall be construed to relieve the permit holder from civil penalties under secs. 144.426, 144.96 or 144.99, Wis. Stats., for violation of the terms or conditions of this permit, or for violation of secs. 144.30 to 144.426, 144.76 and 144.96, Wis. Stats., or of any rule or any special order issued under those sections.

J. Other Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or to relieve the permit holder from any responsibilities, liabilities, or penalties established pursuant to any other applicable federal, state, or local law or regulation. The issuance of this permit does not convey any property rights in either real or personal property, nor does it authorize any injury to private property or any invasion of personal rights.

K. Records Retention

All records and information resulting from any monitoring activities required by this permit shall be retained by the permittee for a minimum of three years pursuant to sec. NR 439.03, Wis. Adm. Code, unless specified in writing by the Department.

L. Reporting

Reports required by Part I of this permit, if any, shall be signed by an authorized representative of the source.

M. Confidential Information

Except for information determined to be confidential under sec. 144.33, Wis. Stats., any information or reports received by the Department in the permit application process, or subsequently obtained, will be available for public inspection at the offices of the Department of Natural Resources.

N. Notification of Transfer

In the event of a transfer of control of operation or ownership of the source, the permittee, prior to such transfer, shall notify its successor by letter of the need for a permit. A copy of this letter shall be forwarded to the Department.

O. Nonexempt Modifications

"Modification" means any change in the physical size or method of operation of a stationary source which:

- (1) increases the potential amount of emissions of an air contaminant;

(2) results in the emission of an air contaminant not previously emitted;
or

(3) results in the violation of an ambient air increment.

Any modification of a source subject to this permit, which is in violation of a term or condition of this permit, is prohibited and may not occur unless a modification of the permit is obtained. If the modification is not in violation of a term or condition of this permit and the modification is an exempt modification under sec. 144.391(4), Stats., or sec. NR 406.04, Wis. Adm. Code, or is authorized by a permit, no additional permit is required for the modification. All other modifications require a permit prior to commencing the modification.

P. Reconstruction or Replacement

Unless the replacement is authorized by a permit or is exempt under sec. NR 406.04, Wis. Adm. Code, replacement of the source(s) covered by this permit is prohibited. If the source(s) covered by this permit is a nonattainment major source or is subject to New Source Performance Standards, reconstruction may also be prohibited unless authorized by a permit.

Q. Circumvention

Pursuant to sec. NR 439.08, Wis. Adm. Code, the installation or use of any article, machine, equipment, process, or method, which conceals an emission which would otherwise constitute a violation of an applicable rule is prohibited unless written approval has been obtained from the Department. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance and the unnecessary separation of an operation into parts to avoid coverage by a rule that applies only to operations larger than a specified size.

R. Operating Permit Review

Operating permits shall be reviewed at least once every 5 years and not more than once every 2 years, in accordance with sec. 144.397, Wis. Stats. The Department may use information received in public comments or at the public hearing as the basis to initiate proceedings under sec. 144.395, Wis. Stats., to alter, suspend, or revoke the permit.

S. Forfeitures

In addition to other penalties or remedies, sec. 144.426, Wis. Stats., provides that any person who violates this permit shall forfeit not less than \$10 nor more than \$25,000 for each violation. Each day of continued violation is a separate offense.

T. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

U. Payment of Application Fee

Sources which are required under chapter NR 410, Wis. Adm. Code and sec. 144.399, Wis. Stats. to pay an application fee shall pay the fee within 30 days of the date of the billing statement. The Department may not issue the release for permanent operation of the source until the Department receives full payment of the application fee.

V. Annual Permit Fee

Pursuant to sec. NR 410.05, Wis. Adm. Code, any person who owns or operates an air contaminant source for which an air pollution control permit has been issued shall pay an annual fee for the implementation and enforcement of the permit conditions.

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