



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE
5636 Southern Boulevard, Virginia Beach, Virginia 23462
(757) 518-2000

www.deq.virginia.gov

Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

Craig R. Nicol
Regional Director

May 31, 2024

Mr. Sahil Tak
Vice President
Tak Investment Holdings, LLC
401 Professional Drive, Suite 110
Gaithersburg, Maryland 20879
Sahil.Tak@stpaperrllc.com

Location: Isle of Wight County
Registration No.: 61646

Dear Mr. Tak:

Attached is a renewal Title V permit to operate your facility pursuant to 9VAC5 Chapter 80 Article 1 of the Virginia Regulations for the Control and Abatement of Air Pollution. The attached permit will be in effect beginning May 31, 2024.

In the course of evaluating the application and arriving at a final decision to issue this permit, the Department of Environmental Quality (DEQ) deemed the application complete on December 7, 2023, and solicited written public comments by placing a newspaper advertisement in the *Tidewater News* newspaper on Wednesday, April 10, 2024. The thirty-day required comment period, provided for in 9VAC5-80-270, expired on Friday, May 10, 2024.

This permit contains legally enforceable conditions. Failure to comply may result in a Notice of Violation and/or civil charges. Please read all permit conditions carefully.

This permit approval to operate shall not relieve Tak Investment Holdings, LLC of the responsibility to comply with all other local, state, and federal permit regulations.

The Board's Regulations as contained in Title 9 of the Virginia Administrative Code 5-170-200 provide that you may request a formal hearing from this case decision by filing a petition with the DEQ within 30 days after this case decision notice was mailed or delivered to you. Please consult the relevant regulations for additional requirements for such requests.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have 30 days from the date you actually received this permit or the date on which it was mailed to you, whichever occurred first, within which to initiate an appeal of this decision by filing a Notice of Appeal with:

Michael S. Rolband, Director
Department of Environmental Quality
PO Box 1105
Richmond, VA 23218

If this permit was delivered to you by mail, three days are added to the thirty-day period in which to file an appeal. Please refer to Part Two A of the Rules of the Supreme Court of Virginia for information on the required content of the Notice of Appeal and for additional requirements governing appeals from decisions of administrative agencies.

If you have any questions concerning this permit, please contact Eric C. Slagle at (757) 763-9667 or by email at eric.slagle@deq.virginia.gov.

Sincerely,

Craig R. Nicol
Regional Director

CRN/MSO/ECS/61646_006_008_24_ST Tissue_T5R_cvrltr.docx

Attachment: Permit

cc: John Brandt, DEQ TRO Air Compliance Manager (john.brandt@deq.virginia.gov)
Maya Whitaker, DEQ Office of Air Permit Programs (OAPP)
(maya.whitaker@deq.virginia.gov)
Yongtian (Tom) He, PhD, U.S. EPA Region III (he.vongtian@epa.gov)
Krystal Stankunas, U.S. EPA Region III (stankunas.krystal@epa.gov)
Premkumar Pichaimani, Lead Process Engineer, ST Tissue, LLC
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Mickey Lee, Mill Manager, ST Tissue, LLC (mickey.lee@sttissuellc.com)



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**Federal Operating Permit
Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1, of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9VAC5-80-50 through 9VAC5-80-300, of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Tak Investment Holdings, LLC
Facility Name:	ST Tissue, LLC
Facility Location:	34050 Union Camp Drive Franklin, Virginia
Registration Number:	61646
Permit Number:	TRO-61646

This permit includes the following programs:

Federally Enforceable Requirements - Clean Air Act

May 31, 2024
Effective Date

May 30, 2029
Expiration Date

May 31, 2024
Signature Date

Craig R. Nicol

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Facility Information

Permittee

Tak Investment Holdings, LLC
401 Professional Drive, Suite 110
Gaithersburg, Maryland 20879

Responsible Official

Sahil Tak
Vice President
Sahil.Tak@stpaperrllc.com

Facility

ST Tissue, LLC
34050 Union Camp
Franklin, Virginia 23851

Contact Person

Mark Burgess
Environmental/Sustainability Manager
mark.burgess@stpaperrllc.com
(902) 639-0351

County-Plant Identification Number: **51-093-00058**

Facility Description:

NAICS **322120** - ST Tissue, LLC is a wet crepe paper manufacturing facility located within the International Paper Franklin Mill site and operating under the International Paper Site Wide Emissions Cap which is permitted in a Federally Enforceable State Operating Permit (FESOP, TRO-60214). ST Tissue, LLC is considered a site tenant and manufactures tissue paper and napkins. ST Tissue, LLC is a Title V major source for PM10, NOx, SO2, CO, VOC, TRS, and H2SO4 under the International Paper Site Wide Emissions Cap Federally Enforceable State Operating Permit. The site wide emissions cap also includes Lead and Fluorides. The International Paper Franklin Mill Site does not currently have a Site-Wide Cap for PM2.5 or Green House Gas (GHG) emissions. The International Paper Franklin Mill site is a major source of HAP emissions.

Emission Units

Equipment to be operated consists of:

Fuel Burning Equipment

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
B01	BSV01	Natural Gas Fired Boiler; (watertube type boiler manufactured by Power Mechanical and equipped with a Low NOx Burner) (2020)	94.6 MMBtu/hr	-	-	-	-

Engines

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
MIS18	MISSV18	#4 Diesel Fire Pump Engine (2000)	2.04 MMBtu/hr 270 hp-hr	-	-	-	-

Fiber Recycling Plant

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
FRP01	FRP01	Fiber Recycling Plant; consisting of two pulpers. Detrasher, screening systems, cleaners, high consistency presses, deckers, bleaching towers, HD Storage Chest, and Stock Preparation	720 Air Dried Tons (ADT)/day 30 ADT/hr	-	-	-	-

Tissue Paper Manufacturing Area

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
TM-05 (PRM05)	PRMSV05	No. 5 Tissue Machine – Consisting of a Tissue Machine and Yankee Dryer	165 tons/day 22.6 MMBtu/hr	-	-	-	8/4/2023
PRM06	PRMSV06	No. 6 Tissue Machine – Consisting of a Tissue Machine and Yankee Dryer	250 tons/day 48 MMBtu/hr	-	-	-	4/3/2012
PRM07	PRMSV07	150 Ton Broke Chest	-	-	-	-	4/3/2012

Miscellaneous Activities

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description*	PCD ID	Pollutant Controlled	Applicable Permit Date
MIS01	-	General Site Traffic	17,500 miles/yr	-	-	-	4/3/2012

*The Size/Rated capacity and PCD efficiency are provided for informational purposes only and are not applicable requirements.

FUEL BURNING EQUIPMENT REQUIREMENTS – (Ref. No. B01)

Limitations

1. **Fuel Burning Equipment Requirements (Ref. No. B01)** - Visible emissions from the boiler's stack shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity as determined by the EPA Method 9 (reference 40 CFR 60 Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9VAC5-80-110 and 9VAC5-50-80)
2. **Fuel Burning Equipment Requirements (Ref. No. B01) – MACT DDDDD** - At all times, the permittee must operate and maintain the boiler (Ref. No. B01), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ that 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.
(9VAC5-80-110 and 40 CFR 63.7500(a)(3))
3. **Fuel Burning Equipment Requirements (Ref. No. B01) – MACT DDDDD** - The permittee must conduct a performance tune-up of the boiler (Ref. No. B01) annually, as specified below. The annual tune-up must be conducted no more than 13 months after the initial startup and then no more than 13 months after the previous tune up. If the boiler (Ref. No. B01) is not in operation on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup.
 - a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
 - b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
 - c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may

delay the inspection until the first outage, not to exceed 36 months from the previous inspection;

- d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
- f. Maintain on-site and submit, if requested by the Administrator, a report containing the information in paragraphs (i) through (iii) below:
 - i. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater;
 - ii. A description of any corrective actions taken as a part of the tune-up; and
 - iii. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.

(9VAC5-80-110, 40 CFR 63.7510(g), 40 CFR 63.7515(d), 40 CFR 63.7540(a)(10), and Table 3 of 40 CFR 63 Subpart DDDDD)

Monitoring

- 4. **Fuel Burning Equipment Requirements (Ref. No. B01)** - The permittee shall perform a monthly visible emissions observation on the boiler (Ref. No. B01) stack during normal operation. If such observation indicates any visible emissions, the permittee shall take corrective actions to eliminate the visible emissions. If such corrective action fails to eliminate the visible emissions, the permittee shall conduct a visible emissions evaluation (VEE) using 40 CFR 60, Appendix A, Method 9 for one hour to determine compliance with the opacity limit. The permittee shall keep records of the monthly observations, any corrective actions taken, and any visible emissions evaluations (VEEs) in accordance with 40 CFR 60, Appendix A, Method 9.
(9VAC5-80-110)

Recordkeeping

5. **Fuel Burning Equipment Requirements (Ref. No. B01)** - The permittee must keep the following records:

- a. Each monthly periodic visible emission observation,
- b. Any corrective action taken, and
- c. Each Method 9 visible emission evaluation performed.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.
(9VAC5-80-110)

6. **Fuel Burning Equipment Requirements (Ref. No. B01) – MACT DDDDD** - The permittee shall maintain records of emissions data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:

- a. A copy of each notification and report submitted to comply with 40CFR63 Subpart DDDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report submitted, according to the requirements in 40CFR63.10(b)(2)(xiv); and
- b. Records of performance tests, fuel analyses, or other compliance demonstrations and performance evaluations as required in 40CFR63.10(b)(2)(viii).

Records must be in a form suitable and readily available for expeditious review, according to 40CFR63.10(b)(1). As specified in 40CFR63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40CFR63.10(b)(1). The permittee can keep the records off site for the remaining 3 years.

(9VAC5-80-110, 40 CFR 63.7555, and 40 CFR 63.7560)

7. **Fuel Burning Equipment Requirements (Ref. No. B01) – NSPS Dc** - The permittee shall do one of the following:
- a. Record and maintain records of the amount of each fuel combusted during each operating day;
 - b. Record and maintain records of the amount of each fuel combusted during each calendar month; or
 - c. Record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
(9VAC5-80-110 and 40 CFR 60.48c(g))

Reporting

8. **Fuel Burning Equipment Requirements (Ref. No. B01) – MACT DDDDD** - The permittee shall submit compliance reports semi-annually, annually, biennially, or every five-years in accordance with 40 CFR 63.7550(b). The first and subsequent compliance reports shall be submitted according to 40 CFR 63.7550(c)(1) and 40 CFR 63.7550(h)(3).
(9VAC5-80-110 and 40 CFR 63.7550)

INTERNAL COMBUSTION ENGINE REQUIREMENTS – (Ref. No. MIS18)

Limitations

9. **Internal Combustion Engine Requirements (Ref. No. MIS18)** - Visible emissions from the fire pump engine exhaust stacks (Ref. No. MIS18) shall not exceed 20% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30% opacity as determined by the EPA Method 9 (reference 40 CFR 60 Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9VAC5-80-110 and 9VAC5-50-80)
10. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The RICE for the fire pump engine (Ref. No. MIS18) shall comply with the emission limitations and other applicable requirements in Table 2c of 40 CFR 63 Subpart ZZZZ, except for startup periods. During periods of startup, the engine's time spent at idle must be minimized and the startup time for the RICE be minimized to a period needed for appropriate and safe engine loading, not to exceed 30 minutes, after which time the non-startup emissions limitations shall apply.
(9VAC5-80-110, 40 CFR 63.6602, and 40 CFR 63.6625(h))

11. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee must use diesel fuel that meets the requirements in 40 CFR 1090.305 for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted.
(9VAC5-80-110 and 40 CFR 63.6604(b))
12. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in 40 CFR 63 Subpart ZZZZ that apply at all times. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, 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 permittee 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 Administrator 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.
(9VAC5-80-110 and 40 CFR 63.6605)
13. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee must operate and maintain the stationary RICE (Ref. No. MIS18) and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or the permittee shall develop a maintenance plan which must provide to the extent practicable for then maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. If an optional oil analysis program is used in accordance with 40 CFR 63.6625(i), it must be a part of the maintenance plan.
(9VAC5-80-110, 40 CFR 63.6625(e), 40 CFR 63.6625(i), 40 CFR 63.6640(a), and Table 6 of 40 CFR 63, Subpart ZZZZ)
14. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee shall meet the following requirements, except during periods of startup:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply. The permittee has the option of utilizing the oil analysis program according to 40 CFR 63.6625(i).

(9VAC5-80-110, 40 CFR 63.6625(i), and Item 1 of Table 2c of 40 CFR 63, Subpart ZZZZ)

15. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee shall operate the emergency stationary RICE according to the requirements in 40 CFR 63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under 40 CFR 63 Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in 40 CFR 63.6640(f)(1) through (4) is prohibited. If the permittee does not operate the engine according to the requirements in 40 CFR 63.6640(f)(1) through (4), the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and must meet all requirements for non-emergency engines.
- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
 - b. The permittee may operate the emergency stationary RICE for any combination of the following purposes for a maximum of 100 hours per calendar year: emergency stationary RICE may be operated for 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. The permittee may petition EPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. Any operation for non-emergency situations as allowed by 40 CFR 63.6640(f)(3) and (4) of 40 CFR 63.6640(f) counts as part of the 100 hours per calendar year allowed by 40 CFR 63.6640(f)(2).
 - c. Emergency stationary RICE located at major sources of HAP 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 15.b. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- (9VAC5-80-110 and 40 CFR 63.6640(f))

Monitoring

16. **Internal Combustion Engine Requirements (Ref. No. MIS18)** - The permittee shall perform Visible Emission Observations (VEO) on the exhaust stack of the fire pump engine (Ref. No. MISC18) according to the following schedule:

Operating Schedule/History	Observation Frequency
< 100 hrs / year*	No Observation Required
100 hrs/yr* < hours operated < 200 hrs/yr*	Once per year*
Hours operated > 200 hrs/yr*	Once every 200 hours

*year means calendar year

Each VEO shall be performed for a sufficient period of time (minimum of 2 minutes) to identify the presence of visible emissions. If no visible emissions are observed, no action shall be required. However, if visible emissions are observed, the permittee shall take corrective actions to eliminate the visible emissions. If such corrective action fails to eliminate the visible emissions, a visible emissions evaluation (VEE) shall be conducted using 40 CFR Part 60, Appendix A, Method 9 for a period of not less than 6 minutes. If the average opacity exceeds 20%, modifications and/or repairs shall be performed to correct the problem and the corrective measures shall be recorded. If such corrective action fails to reduce the opacity to below 20% opacity during a 6 minute observation, a VEE in accordance with 40 CFR Part 60, Appendix A, Method 9, shall be performed for a period of at least 60 minutes to determine compliance with the opacity limits specified in Condition 9 of this permit. The VEE observer shall be currently Method 9 certified. The permittee shall record the details of the observations, VEE, and any maintenance actions to reduce opacity.
(9VAC5-80-110)

17. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee shall install a non-resettable hour meter on the existing emergency stationary RICE if one is not already installed.
(9VAC5-80-110 and 40 CFR 63.6625(f))

Recordkeeping

18. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee must keep the following records:
- Records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.
 - Records of all required maintenance performed on the air pollution control and monitoring equipment.

- c. Records of all actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- d. Records required in Table 6 of 40 CFR 63 Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to the permittee.
- e. Records of the maintenance conducted on the stationary RICE in order to demonstrate that the source operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's maintenance plan.
- f. If the oil analysis program described in Condition 14 is implemented, the permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engines.
- g. If the emergency stationary RICE does not meet the standards in 40 CFR 63 Subpart ZZZZ applicable to non-emergency engines, the permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The documentation shall include the information specified in 40 CFR 63.6655(f).
- h. Visible emissions monitoring records as required in Condition 16.

(9VAC5-80-110, 40 CFR 63.6625(i), and 40 CFR 63.6655(a), (d), (e), and (f))

19. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** – The permittee must keep the following records:

- a. In a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1);
 - b. As specified in 40 CFR 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record; and
 - c. Readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1).
- (9VAC5-80-110 and 40 CFR 63.6660)

Reporting

20. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - The permittee must report each instance in which the source did not meet an applicable operating limitation in Table 2c of 40 CFR 63 Subpart ZZZZ, and any applicable requirement included in Table 8 of 40 CFR 63 Subpart ZZZZ.
(9VAC5-80-110 and 40 CFR 63.6640(b) and (e))
21. **Internal Combustion Engine Requirements (Ref. No. MIS18) – MACT ZZZZ** - If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.
(9VAC5-80-110 and Footnote 1 of Table 2c of 40 CFR 63 Subpart ZZZZ)

FIBER RECYCLING PLANT REQUIREMENTS – (Ref. No. FRP01)

22. **Fiber Recycle Plant – (FRP01) - Requirements by Reference** - Except where this permit is more restrictive than the applicable requirement, the fiber recycle plant (FRP01) shall be operated in compliance with the requirements of 40 CFR 63 Subpart S.
(9VAC5-80-110)

TISSUE PAPER MANUFACTURING AREA REQUIREMENTS – (Ref. Nos. TM-05, PRM06, and PRM07)

Limitations

23. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - Particulate emissions from the No. 5 Tissue Machine (TM-05) shall be controlled by good operating practices.
(9VAC5-80-110 and Condition 1 of 08/04/2023 NSR Permit)
24. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - Particulate emissions from the 22.6 MMBtu/hr Yankee Dryer shall be controlled by the use of natural gas.
(9VAC5-80-110 and Condition 2 of 08/04/2023 NSR Permit)

25. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - The throughput of natural gas to the 22.6 MMBtu/hr Yankee Dryer shall not exceed 194 million cubic feet per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9VAC5-80-110 and Condition 3 of 08/04/2023 NSR Permit)
26. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - The production of tissue from the No. 5 tissue machine shall not exceed 53,200 tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
(9VAC5-80-110 and Condition 4 of 08/04/2023 NSR Permit)
27. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - The approved fuel for the 22.6 MMBtu/hr Yankee Dryer is natural gas. A change in the fuel shall be considered a change in the method of operation of the Yankee Dryer and may require a new or amended permit. However, if a change in the fuel is not subject to new source review permitting requirements, this condition should not be construed to prohibit such a change.
(9VAC5-80-110 and Condition 5 of 08/04/2023 NSR Permit)
28. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - Emissions from the operation of the No. 5 Tissue Machine and the 22.6 MMBtu/hr Yankee Dryer shall not exceed the limits specified below:
- | | |
|--------|-------------|
| PM 2.5 | 9.8 tons/yr |
|--------|-------------|
- These emissions are derived from the estimated overall emission contribution from operating limits. Exceedance of the operating limits may be considered credible evidence of the exceedance of emission limits. Compliance with these emission limits may be determined as stated in Conditions 25, 26, 27, and 29.
(9VAC5-80-110 and Condition 6 of 08/04/2023 NSR Permit)
29. **Tissue Paper Manufacturing Requirements (Ref. No. TM-05)** - Visible emissions from the No. 5 Tissue Machine (Ref. No. TM-05) stack shall not exceed 5% opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 10% opacity as determined by the EPA Method 9 (reference 40 CFR 60 Appendix A). This condition applies at all times except during startup, shutdown, and malfunction.
(9VAC5-80-110 and Condition 7 of 08/04/2023 NSR Permit)

30. **Tissue Paper Manufacturing Requirements (Ref. Nos. PRM06 and PRM07)** - Visible Emissions from each of the No. 6 Tissue Machine (Ref. No. PRM06) and the 150 Ton Broke Chest (Ref. No. PRM07) stacks shall not exceed 20 percent opacity except during one six-minute period in any one hour in which visible emissions shall not exceed 30 percent opacity. This condition applies at all times except during startup, shutdown, and malfunction.
(9VAC5-80-110 and 9VAC5-50-80)

Monitoring

31. **Tissue Paper Manufacturing Requirements (Ref. Nos. TM-05, PRM06, and PRM07)** - The permittee shall perform a monthly visible emissions observation on the No. 5 Tissue Machine (Ref. No. PRM05) stack, the No.6 Tissue Machine (Ref. No. PRM06) stack, and the 150 ton Broke Chest (Ref. No. PRM07) stack during normal operation of each process. If such observation indicates any visible emissions, the permittee shall take corrective actions to eliminate the visible emissions. If such corrective action fails to eliminate the visible emissions, the permittee shall conduct a visible emissions evaluation (VEE) using 40 CFR 60, Appendix A, Method 9 for one hour to determine compliance with the opacity limit. The permittee shall keep records of the monthly observations, any corrective actions taken, and any visible emissions evaluations (VEEs) in accordance with 40 CFR 60, Appendix A, Method 9.
(9VAC5-80-110)

Recordkeeping

32. **Tissue Paper Manufacturing Requirements (Ref. Nos. TM-05)** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Tidewater Regional Office. These records shall include, but are not limited to:
- a. Annual production of tissue from the No. 5 tissue machine, in tons per year, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.
 - b. Annual throughput of natural gas to the 22.6 MMBtu/hr Yankee Dryer, in million cubic feet, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110 and Condition 8 of 08/04/2023 NSR Permit)

33. Tissue Paper Manufacturing Requirements (Ref. Nos. TM-05, PRM06, and PRM07) -

The permittee shall maintain records of the following items for the No. 5 Tissue Machine (Ref. No. PRM05), the No. 6 Tissue Machine (Ref. No. PRM06), and the 150 Ton Broke Chest (Ref. No. PRM07):

- a. Each monthly periodic visible emission observation,
- b. Any corrective action taken, and
- c. Each Method 9 visible emission evaluation performed.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9VAC5-80-110)

Testing

34. Tissue Paper Manufacturing Requirements (Ref. Nos. TM-05, PRM06, and PRM07) -

Upon request by the DEQ, the permittee shall conduct additional performance tests to demonstrate compliance with the emission limits contained in this permit. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the appropriate method(s) in accordance with procedures approved by the DEQ. The details of the tests shall be arranged with the DEQ.

(9VAC5-80-110)

Reporting

35. Tissue Paper Manufacturing Requirements (Ref. Nos. TM-05, PRM06, and PRM07) -

The permittee shall submit reports of any required monitoring at least every six months. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 9VAC5-80-80(G). Prompt reporting of 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.

(9VAC5-80-110)

Facility Wide Conditions – International Paper FESOP

36. **Pollutants Covered Under the International Paper Site-Wide Emissions Cap**

PM, PM₁₀, SO₂, NO_x, CO, VOC, TRS, Lead, H₂SO₄, and Fluorides.
(9VAC5-80-110 and 9VAC5-230-40)

37. **Compliance with State and Federal Regulations and Air Permits**

The International Paper Federally Enforceable State Operating Permit allows any Site Tenant to construct and operate new emission units or modify and operate existing emission units at the site. Any construction, reconstruction or modification activities shall be deemed to satisfy all requirements of the major and minor new source review program for the pollutants specified in Condition 36 provided that there is no exceedance of any Emission Cap. Exceedance of any Emission Cap or other provisions of this permit, whether caused directly by the actions or omissions of International Paper or those of a site tenant may subject International Paper to permitting requirements, enforcement and/or permit revocation.

(9VAC5-80-110 and 9VAC5-230-50(B))

Major NSR Permitting and Registration

38. **Major NSR Permitting and Registration** – Compliance with this permit shall be deemed to satisfy all requirements of the major new source review program for the pollutants listed in Condition 36.

Note: There is no GHG emissions cap.

- a. **Definition** – “Physical or operational change” means any physical or operational change at the affected facility that involves the addition of a new emissions unit or a modification to an existing emission unit.
- b. **Control Technology** – For any physical or operational change (as defined above) that would otherwise be subject to the major NSR program, any site tenant of the International Paper-Franklin Mill shall submit a control technology application to and shall obtain approval thereof from the Department of Environmental Quality (DEQ) that the control technology to be installed meets the applicable requirements of Article 4 (9VAC5-50-240 et seq.) of Part II of 9VAC5 Chapter 50. The site tenant shall install emission controls that are consistent with the approval. The site tenant may begin and complete actual construction of the physical or operational change prior to receiving approval from the DEQ if each of the following conditions is met:
 - i. The site tenant has submitted an approvable control technology application for the physical or operational change with a notice of intent to begin actual construction of the physical or operational change.

- ii. The site tenant has submitted a certification that it:
 - (1) Freely assumes all financial and other risks associated with beginning actual construction of the physical or operational change prior to receiving the control technology approval; and
 - (2) Acknowledges that the DEQ, in evaluating the application, may not consider any consequences to the applicant of beginning actual construction prior to receiving the control technology approval.
 - iii. The DEQ has not, within 30 days of receipt of the application, issued a written notice to the site tenant, based on concerns about air quality impacts or emissions control technology, requiring the termination of construction as soon as practicable but no later than five business days after receipt of the notice.
 - iv. The site tenant constructs the physical or operational change as described in the control technology application.
 - v. The site tenant does not commence operation of the physical or operational change until the control technology approval has been granted.
- c. **DEQ Response** - If the DEQ has not, within 60 days of receipt of the control technology application submitted in accordance with Condition 38.b issued a written notice to the site tenant either approving or objecting to the construction of the physical or operational change, the control technology application may be deemed granted.
(9VAC5-80-110 and 9VAC5-230-50(D) and (E))

Minor NSR Permitting

39. **Minor NSR Permitting** - Compliance with this permit shall be deemed to satisfy all requirements of minor NSR program for all pollutants listed in Condition 36.
Note: There is no Site-wide cap for PM_{2.5} so minor source permitting applicability for PM_{2.5} needs to be performed for each change at the facility.
(9VAC5-80-110 and 9VAC5-230-50(A), (B), and (C))
40. **Hazardous Air Pollutants** - Except for pollutants specified in Condition 36 compliance with this permit does not relieve International Paper or any site tenant from obligations to comply with requirements addressing emissions of hazardous air pollutants under Articles 4 (9VAC5-60-200 et seq.) and 5 (9VAC5-60-300 et seq.) of Part II of 9VAC5 Chapter 60.
(9VAC5-80-110 and 9VAC5-230-50(B) and (C))

Other Regulations Encompassed

41. **New Source Performance Standards (NSPS) for Stationary Sources:** TAK Investments, LLC, the site tenant, is subject to various NSPS regulations and shall comply with all the requirements of each NSPS regulation. If the site tenant becomes subject to a regulation listed in 40 CFR Part 60, after the effective date of the permit, the site tenant shall comply with all requirements under that regulation.
(9VAC5-80-110 and 9VAC5-230-60(A))
42. **National Emission Standards for Hazardous Air Pollutants:** TAK Investments, LLC is subject to various NESHAP regulations and shall comply with all the requirements of each NESHAP. If TAK Investments, LLC becomes subject to a regulation listed in 40 CFR Part 61 or Part 63, after the effective date of the permit, TAK Investments, LLC shall comply with all requirements under that regulation.
(9VAC5-80-110 and 9VAC5-230-60(A))
43. **State Air Pollution Control Board (SAPCB) -** TAK Investments, LLC shall remain in compliance with all other SAPCB Regulations. Compliance with this permit shall constitute compliance with Article 4 of 9VAC5 Chapter 50 and Article 6, Article 8, and Article 9 of 9VAC5 Chapter 80 for the pollutants listed in Condition 36.
(9VAC5-80-110, 9VAC5-230-50(B), and 9VAC5-230-60(A))
44. **Other Laws and Regulations -** Compliance with the terms and conditions of this permit shall not relieve TAK Investments, LLC of its obligation to comply with applicable local, State or Federal laws and regulations not addressed in this section.
(9VAC5-80-110 and 9VAC5-230-60(A))

Compliance Determination

45. TAK Investments, LLC, the site tenant, shall demonstrate compliance with the emission caps in Condition 36 as follows:
 - a. Actual emissions from existing processes (those whose emissions were included in determining the emission caps) shall be determined using the methodology used in establishing the emission caps, as found in Appendix A of this permit, except where the DEQ has approved alternative emissions quantification methods.
 - b. Actual emissions from any physical or operational changes (those not in existence on the effective date of the variance) shall be calculated using methodology approved by the DEQ.
- (9VAC5-80-110 and 9VAC5-230-80(A))

Monitoring

46. **Site-Wide Monitoring** - The permittee shall monitor throughputs, hours of operation, venting minutes and other parameters as necessary to determine actual emissions to demonstrate compliance with the emission caps. Monitoring to show compliance with the emission caps in this permit or other SAPCB regulations shall be carried out as specified in the applicable regulations, the Title V permits, in the International Paper FESOP, or as agreed to by the DEQ.
(9VAC5-80-110, 9VAC5-230-50(F), and 9VAC5-230-80(A))
47. **Calculating Emissions** - Actual emissions of emission cap pollutants from the facility shall be calculated as described in Condition 45 of this permit. Records shall be kept for five years and shall be available for inspection.
(9VAC5-80-110, 9VAC5-230-50(F), and 9VAC5-230-80(A))

Maintenance/Operator Training Procedures

48. **General Maintenance and Training** - The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
 - b. Maintain an inventory of spare parts.
 - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
 - d. Train operators in the proper operation of all such equipment prior to such operation and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided including the names of trainees, the date of training and the nature of the training.

Records of maintenance and training shall be maintained on site for a period of five years and shall be made available to DEQ personnel upon request.
(9VAC5-80-110 and 9VAC5-230-80(A))

Testing

49. **Performance Testing** - Future performance testing shall be conducted in a manner consistent with acceptable DEQ procedures and methods. The details of the tests and reports are to be arranged in advance with the DEQ. The permittee shall submit to the DEQ an approvable test protocol at least 30 days prior to testing. A copy of the test results shall be submitted to the DEQ within 60 days after test completion and shall conform to a format acceptable to the DEQ.
(9VAC5-80-110 and 9VAC5-230-80(A))
50. **Testing/Monitoring Ports** - All emission units and air pollution control devices shall be constructed so as to allow for emissions testing and monitoring upon reasonable notice at any time, using appropriate methods. This includes constructing the emission units and air pollution control devices such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and providing stack or duct that is free from cyclonic flow. Test ports shall be provided when requested at the appropriate locations.
(9VAC5-80-110 and 9VAC5-230-80(A))
51. **Testing** - The DEQ reserves the right to require site-specific testing at any time to verify compliance with information submitted by the permittee.
(9VAC5-80-110 and 9VAC5-230-80(A))

Recordkeeping

52. **Recordkeeping** - The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the DEQ. These records shall include, but are not limited to:
- a. The permittee shall keep records of process throughputs, emissions and other parameters as necessary to determine actual emissions to demonstrate compliance with the emission caps. Records shall be kept for five years and shall be available for inspection.
 - b. Records shall be available for inspection and shall be kept for five years.
(9VAC5-80-110 and 9VAC5-230-80(A))

Insignificant Emission Units

53. Insignificant Emission Units - The following emission units at the facility are identified in the application as insignificant emission units under 9VAC5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720B)	Rated Capacity (9VAC5-80-720C)
--	None Identified	--	--	--

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9VAC5-80-110. (9VAC5-80-110)

Permit Shield & Inapplicable Requirements

54. **Permit Shield & Inapplicable Requirements** - Compliance with the provisions of this permit shall be deemed in compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
9VAC5 Chapter 40	Existing Stationary source	ST Tissue does not have any emission units subject to this chapter.
9VAC5 Chapter 80, Article 3	Federal Operating Permits for Acid Rain Sources	ST Tissue does not have any affected emissions units.
40 CFR Part 60, Subpart BB	Standards of Performance for Kraft Pulp Mills	ST Tissue does not own or operate a Kraft Pulp Mill.
40 CFR Part 60 Subparts D, Da, and Db	New Source Performance Standards For Fossil-Fuel-Fired Steam Generators, Electric Utility Steam Generating Units And Large Industrial-Commercial-Institutional Steam Generating Units	ST Tissue's boiler is below 100 MMBtu/hr heat input capacity.
40 CFR Part 60 Subparts K, Ka, and Kb	New Source Performance Standards For Volatile Organic Liquid Storage Vessels including Petroleum Liquid Storage Vessels	There are no storage vessels on site that have a storage capacity of 40,000 gallons or larger.
40 CFR Part 63, Subpart MM	National Emission Standards for Hazardous Air Pollutant for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite and Stand-Alone Semichemical Pulp Mills	ST Tissue does not own or operate a Kraft, Soda, Sulfite, or Stand-Alone Semichemical Pulp Mill.
40 CFR Part 63 Subpart OO	National Emission Standards For Tanks - Level 1	This subpart applies to the control of air emissions from storage vessels for which another subpart references the use of this subpart for such air emission control. ST Tissue's tanks are not subject to another subpart that references use of 40 CFR 63 Subpart OO.
40 CFR Part 63 Subpart WW	National Emission Standards For Storage Vessels (Tanks) - Level 2	This subpart applies to the control of air emissions from storage vessels for which another subpart references the use of this subpart for such air emission control. ST Tissue's tanks are not subject to another subpart that references use of 40 CFR 63 Subpart WW.
40 CFR Part 60 Subpart IIII	New Source Performance Standards For Stationary Compression Ignition Combustion Engines	MIS18 is a pre-2005 engine and has not been modified or reconstructed after July 11, 2005.
40 CFR Part 63, Subpart JJJJ	National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating	ST Tissue does not own or operate web coating lines that would trigger applicability of this subpart.

40 CFR Part 63, Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants: Coal and Oil Fired Electric Utility Steam Generating Units	ST Tissue does not own or operate a coal-fired electric utility steam generating unit (EGU) or an oil-fired EGU.
40 CFR Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants For Industrial, Commercial, and Institutional Boilers at Area Sources	This site is not an Area source.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by (i) the administrator pursuant to §114 of the federal Clean Air Act or (ii) the DEQ pursuant to §10.1-1307.3 or §10.1-1315 of the Virginia Air Pollution Control Law.
(9VAC5-80-110 and 9VAC5-80-140)

General Conditions

55. **General Conditions - Federal Enforceability** - All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.
(9VAC5-80-110)

56. General Conditions - Permit Expiration

- a. This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the DEQ consistent with the requirements of 9VAC5-80-80, the right of the facility to operate shall be terminated upon permit expiration.
- b. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
- c. If an applicant submits a timely and complete application for an initial permit or renewal under 9VAC5-80-80(F), the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9VAC5 Chapter 80, until the DEQ takes final action on the application under 9VAC5-80-150.
- d. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9VAC5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9VAC5 Chapter 80.

- e. If an applicant submits a timely and complete application under section 9VAC5-80-80 for a permit renewal but the DEQ fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9VAC5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
- f. The protection under subsections F 1 and F 5 (ii) of section 9VAC5-80-80(F) shall cease to apply if, subsequent to the completeness determination made pursuant to section 9VAC5-80-80(D), the applicant fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(9VAC5-80-80, 9VAC5-80-110, and 9VAC5-80-170)

57. **General Conditions - Recordkeeping and Reporting** - All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:

- a. The date, place as defined in the permit, and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of such analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

(9VAC5-80-110)

58. **General Conditions - Recordkeeping and Reporting** - Records of all monitoring data and support information shall be retained for at least five 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 for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9VAC5-80-110)

59. **General Conditions - Recordkeeping and Reporting** - The permittee shall submit the results of monitoring contained in any applicable requirement to the DEQ no later than March 1 and September 1 of each calendar year. This report must be signed by a responsible official, consistent with 9VAC5-80-80(G), and shall include:
- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31; and
 - b. All deviations from permit requirements. For purpose of this permit, deviations include, but are not limited to:
 - i. Exceedances of emissions limitations or operational restrictions;
 - ii. Excursions from control device operating parameter requirements, as documented by continuous emission monitoring or periodic monitoring, or Compliance Assurance Monitoring (CAM) which indicates an exceedance of emission limitations or operational restrictions; or,
 - iii. Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.
 - c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that "no deviations from permit requirements occurred during this semiannual reporting period."
- (9VAC5-80-110)
60. **General Conditions - Annual Compliance Certification** - Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to the Environmental Protection Agency (EPA) and the DEQ no later than March 1 each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices for the period ending December 31. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a) (3) and §504(b) of the federal Clean Air Act. The permittee shall maintain a copy of the certification for five (5) years after submittal of the certification. This certification shall be signed by a responsible official, consistent with 9VAC5-80-80(G), and shall include:
- a. The time period included in the certification. The time period to be addressed is January 1 to December 31;

- b. The identification of each term or condition of the permit that is the basis of the certification;
- c. The compliance status;
- d. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance;
- e. Consistent with subsection 9VAC5-80-110, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period;
- f. Such other facts as the permit may require to determine the compliance status of the source; and
- g. One copy of the annual compliance certification shall be submitted to the EPA in electronic format only. The certification document should be sent to the following electronic mailing address:

R3_APD_Permits@epa.gov

(9VAC5-80-110)

- 61. **General Conditions - Permit Deviation Reporting** - The permittee shall notify the Tidewater Regional Office within four daytime business hours after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semiannual compliance monitoring report pursuant to Condition 59 of this permit.
(9VAC5-80-110(F)(2))
- 62. **General Conditions - Failure/Malfunction Reporting** - In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall no later than four daytime business hours after the malfunction is discovered, notify the Tidewater Regional Office of such failure or malfunction and within 14 days provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Tidewater Regional Office.
(9VAC5-80-110 and 9VAC5-20-180)

63. **General Conditions – Severability** - The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.
(9VAC5-80-110)
64. **General Conditions - Duty to Comply** - The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.
(9VAC5-80-110)
65. **General Conditions - Need to Halt or Reduce Activity not a Defense** - 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.
(9VAC5-80-110)
66. **General Conditions - Permit Modification** - A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9VAC5-80-50, 9VAC5-80-1100, 9VAC5-80-1605, or 9VAC5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios.
(9VAC5-80-110, 9VAC5-80-190, and 9VAC5-80-260)
67. **General Conditions - Property Rights** - The permit does not convey any property rights of any sort, or any exclusive privilege.
(9VAC5-80-110)
68. **General Conditions - Duty to Submit Information** - The permittee shall furnish to the DEQ, within a reasonable time, any information that the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality.
(9VAC5-80-110)
69. **General Conditions - Duty to Submit Information** - Any document (including reports) required in a permit condition to be submitted to the DEQ shall contain a certification by a responsible official that meets the requirements of 9VAC5-80-80(G).
(9VAC5-80-110)

70. **General Conditions - Duty to Pay Permit Fees** - The owner of any source for which a permit was issued under 9VAC5-80-50 through 9VAC5-80-300 shall pay annual emissions fees, as applicable, consistent with the requirements of 9VAC5-80-310 through 9VAC5-80-350 and annual maintenance fees, as applicable, consistent with the requirements of 9VAC5-80-2310 through 9VAC5-80-2350.
(9VAC5-80-110, 9VAC5-80-310 et seq., and 9VAC5-80-2310 et seq.)
71. **General Conditions - Fugitive Dust Emission Standards** - During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:
- a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
 - b. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
 - c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or similar operations;
 - d. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
 - e. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.
(9VAC5-80-110 and 9VAC5-40-90)
72. **General Conditions - Startup, Shutdown, and Malfunction** - At all times, including periods of startup, shutdown, and soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the DEQ, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
(9VAC5-80-110 and 9VAC5-40-20(E))

73. **General Conditions - Alternative Operating Scenarios** - Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9VAC5 Chapter 80, Article 1.
(9VAC5-80-110)

74. **General Conditions - Inspection and Entry Requirements** - The permittee shall allow the DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

- a. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
- c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
- d. Sample or monitor at reasonable times' substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9VAC5-80-110)

75. **General Conditions - Reopening for Cause** - The permit shall be reopened by the DEQ if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9VAC5-80-80(F). The conditions for reopening a permit are as follows:

- a. The permit shall be reopened if the DEQ or the 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.

- b. The permit shall be reopened if the administrator or the DEQ determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
- c. The permit shall not be reopened by the DEQ if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9VAC5-80-110(D).

(9VAC5-80-110)

76. **General Conditions - Permit Availability** - Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to the DEQ upon request.
(9VAC5-80-110 and 9VAC5-80-150)

77. **General Conditions - Transfer of Permits**

- a. No person shall transfer a permit from one location to another, unless authorized under 9VAC5-80-130, or from one piece of equipment to another.
- b. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the DEQ of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9VAC5-80-200.
- c. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the DEQ of the change in source name within 30 days of the name change and shall comply with the requirements of 9VAC5-80-200.

(9VAC5-80-110 and 9VAC5-80-160)

78. **General Conditions - Permit Revocation or Termination for Cause** - A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9VAC5 Chapter 80 Article 1. The DEQ may suspend, under such conditions and for such period of time as the DEQ may prescribe any permit for any grounds for revocation or termination or for any other violations of these regulations.
(9VAC5-80-110, 9VAC5-80-190(C), and 9VAC5-80-260)

79. **General Conditions - Duty to Supplement or Correct Application** - Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.
(9VAC5-80-110 and 9VAC5-80-80(E))
80. **General Conditions - Stratospheric Ozone Protection** - If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.
(9VAC5-80-110 and 40 CFR Part 82)
81. **General Conditions - Asbestos Requirements** - The permittee shall comply with the requirements of National Emissions Standards for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.148), and Standards for Waste Disposal (40 CFR 61.150).
(9VAC5-60-70 and 9VAC5-80-110)
82. **General Conditions - Accidental Release Prevention** - If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.
(9VAC5-80-110 and 40 CFR Part 68)
83. **General Conditions - Changes to Permits for Emissions Trading** - No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.
(9VAC5-80-110)
84. **General Conditions - Emissions Trading** - Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:
- a. All terms and conditions required under 9VAC5-80-110, except subsection N, shall be included to determine compliance.
 - b. The permit shield described in 9VAC5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.

- c. The owner shall meet all applicable requirements including the requirements of 9VAC5-80-50 through 9VAC5-80-300.

(9VAC5-80-110)

Appendix A

Emission Units and Quantification Methods

Below is a table listing all the emission sources and the method of calculating emissions from each emission unit for each pollutant.

Emission Unit ID^a	Emission Unit Description	Emission Quantification Method^b	Pollutant
PRM06	No. 6 Paper Machine – Tissue Machine - Owned and operated by Tak	T&SF	PM, PM ₁₀ , VOC
	No. 6 Paper Machine – Yankee Dryer - Owned and operated by Tak	T&SSEF, T&SF	PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC
PRM07	150 Ton Broke Chest – Owned and operated by Tak	CV	VOC
MIS01	Other Truck Traffic	CV	PM, PM ₁₀

^a This is the Unit Reference ID number.

^b List of Emission Quantification Methods:

CV = Constant Value, no change to emissions from year to year, assumed to always be the same.

T&SSEF = Use of throughput and a site-specific emission factor.

T&SF = Use of throughput and a supplied emission factor from either NCASI or AP-42.

Emission Factor Tables

Emission Factors for PM

Unit ID	Emission Unit Description	PM Factor	PM Factor Units	PM Factor Source
PRM06	No. 6 Paper Machine – Tissue Machine - Owned and operated by Tak	1.11	lb/MDT tissue	NCASI TB 942, Mill C, Table E3a (filterable PM and condensable PM)
	No. 6 Paper Machine – Yankee Dryer - Owned and operated by Tak	7.6	lb/MMscf	AP-42 Table 1.4-2 (filterable PM ₁₀ and condensable PM ₁₀)
MIS01	Other Truck Traffic	32.72	ton/yr	EPA AP-42 Section 13.2.1.1, December 2003 - average of 5-year baseline period

Emission Factors for PM₁₀

Unit ID	Emission Unit Description	PM ₁₀ Factor	PM ₁₀ Factor Units	PM Factor Source
PRM06	No. 6 Paper Machine – Tissue Machine - Owned and operated by Tak	0.48	lb/MDT tissue	NCASI TB 942, Mill C, Table E3a (filterable PM and condensable PM)
	No. 6 Paper Machine – Yankee Dryer - Owned and operated by Tak	7.6	lb/MMscf	AP-42 Table 1.4-2 (filterable PM ₁₀ and condensable PM ₁₀)
MIS01	Other Truck Traffic	6.38	ton/yr	EPA AP-42 Section 13.2.1.1, December 2003 - average of 5-year baseline period

Emission Factors for SO₂

Unit ID	Emission Unit Description	SO ₂ Factor	SO ₂ Factor Units	SO ₂ Factor Source
PRM06	No. 6 Paper Machine – Yankee Dryer – Owned and operated by Tak	0.6	lb/MMscf	AP-42 Table 1.4-2

Emission Factors for NO_x

Unit ID	Emission Unit Description	NO _x Factor	NO _x Factor Units	NO _x Factor Source
PRM06	No. 6 Paper Machine – Yankee Dryer– Owned and operated by Tak	60	lb/MMscf	Vendor data

Emission Factors for CO

Unit ID	Emission Unit Description	CO Factor	CO Factor Units	CO Factor Source
PRM06	No. 6 Paper Machine – Yankee Dryer – Owned and operated by Tak	100	lb/MMscf	Vendor data

Emission Factors for VOC

Unit ID	Emission Unit Description	VOC Factor	VOC Factor Units	VOC Factor Source
PRM06	No. 6 Paper Machine – Tissue Machine – Owned and operated by Tak	2.5	lb/MDT tissue	AP-42 Table 1.4-2
	No. 6 Paper Machine – Yankee Dryer – Owned and operated by Tak	5.5	lb/MMscf	EPA AP-42 Section 3.3

Conversion Factors and Inputs

Conversion Factors

Unit ID	Emission Unit Description	Throughput Units	Conversion Factor		Throughput source or comment
PRM06	No. 6 Paper Machine- Tissue Machine – Owned and operated by Tak	MDTFP/month	1.0556	ADTFP/MDTFP	Tak production data-depends on their from REEL moisture content
	No. 6 Paper Machine- Yankee Dryer – Owned and operated by Tak	MMscf/month	--	--	Monthly gas usage
PRM07	150 Ton Broke Chest – Owned and operated by Tak	--	--	--	Constant Value
MIS01	Other Truck Traffic	--	--	--	Constant Value

Inputs

The table below lists all the data that International Paper shall input on a monthly basis to show compliance with the emission caps.

Tanks/Chests Operating Time

150 Ton Broke Chest hrs/month (Owned and operated by Tak)

Paper Machine Throughputs

No. 6 Paper Machine: MDTFP/month (Owned and operated by Tak)

Fuel Throughput

No. 6 PM – Yankee Dryer:
Natural gas MMft³ gas/month (Owned and operated by Tak)