

Via Certified Mail XXXXXXXXXXXX

Mr. Robert H. Thomas  
International Paper Company  
P.O. Box 539  
Terre Haute, IN 47808

September XX, 2004

Re: 167-19468  
First Administrative Amendment to  
Part 70 Permit T167-7358-00022

Dear Mr. Thomas:

International Paper Company was issued a Part 70 (Title V) Operating Permit on March 22, 2004 for an integrated, semi-chemical, pulp and paper mill. A letter requesting two revisions to this permit was received on June 16, 2004. The two revisions requested affect the following conditions: Condition D.2.5, changing the source testing period from 6 to 12 months to 3 to 12 months; Condition D.2.9(b), changing the Notification of Compliance Status (NOCS) submission date language. Condition D.2.9(b) will remain as written, as the NOCS was received within the timeframe specified in the Part 70 permit. Pursuant to the provisions of 326 IAC 2-7-11(a)(7) the permit is hereby administratively amended as follows:

**Compliance Determination Requirements**

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between ~~3 and 12~~ ~~6 and 12~~ months after issuance of this permit, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform PM testing on emissions from PMET003, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Scott Sines, at (812) 462-3433, extension 12.

Sincerely,

George M. Needham  
Director  
Vigo County Air Pollution Control

Attachments

sbs

cc: IDEM - Mindy Hahn  
IDEM - Winter Bottum

# PART 70 OPERATING PERMIT

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY and VIGO COUNTY AIR POLLUTION CONTROL

International Paper Co.  
2401 Prairieton Ave.  
Terre Haute, Indiana 47802

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T167-7358-00022	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: March 22, 2004 Expiration Date: March 22, 2009
First Administrative Amendment 167-19468	Page(s) Affected: 37
Issued by:  George M. Needham, Director Vigo County Air Pollution Control	Issuance Date: September XX, 2004

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

Spent liquor fluidized-bed recovery reactor (Dorr Oliver), installed in 1976, identified as PMET003, with a maximum capacity of 35 gallons per minute at 62% black liquor solids and a maximum supplemental fuel firing rate of 30.24 million BTU per hour, using a venturi scrubber for control, and exhausting to stack/vent 038.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart MM.

#### D.2.2 Pulp and Paper Combustion NESHAP [326 IAC 2-7-5][40 CFR Part 63, Subpart MM]

PMET003 (Spent liquor fluidized-bed reactor) is subject to the National Emission Standard Hazardous Air Pollutants, 40 CFR 63, Subpart MM and shall be in compliance with all applicable provisions of this rule no later than March 13, 2004. The Pulp and Paper Recovery Combustion NESHAP consists of the following sections:

- 63.860 Applicability and designation of affected source
- 63.861 Definitions
- 63.862 Standards
- 63.863 Compliance dates
- 63.864 Monitoring requirements
- 63.865 Performance test requirements and test methods
- 63.866 Recordkeeping requirements
- 63.867 Reporting requirements
- 63.868 Delegation of authority
- Appendix to Subpart MM - Table

Before the Permittee initiates specific equipment or operational changes to comply with this NESHAP they must apply for and obtain a Significant Permit Modification. This modification will reopen this section and spell out the specific applicable requirements for the chosen compliance method.

#### D.2.3 Particulate Matter (PM) [326 IAC 6-1-13]

Pursuant to 326 IAC 6-1-13, PMET003 is limited 71 pounds of particulate matter per hour. PMET003 is also limited to a total of 311.0 tons of particulate matter per year.

#### D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

### Compliance Determination Requirements

#### D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

During the period between 3 and 12 months after issuance of this permit, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform PM testing on emissions from PMET003, utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

#### D.2.6 Control Equipment

The venturi scrubber (with mist elimination) controlling PM emissions from PMET003 shall be in operation at all