

***DRAFT* Part 70 Permit
No. 47-065-3455**

This Permit Shall Remain in Full Force and Effect
From December xx, 2023, through March 16, 2028

Issued to:

**SONOCO PRODUCTS COMPANY
701 MANUFACTURERS ROAD
CHATTANOOGA, TENNESSEE 37405-3703**

Designated Representative:

Gary Brown
Technical Director
Telephone: 423.702.2119

Responsible Official:

James Haun
Mill Manager

*An Application for Renewal Must Be Submitted to the Executive Director
of the Chattanooga-Hamilton County Air Pollution Control Bureau
No Later Than September 16, 2027*

**CHATTANOOGA-HAMILTON COUNTY
AIR POLLUTION CONTROL BUREAU**

CBL Center II
2034 Hamilton Place Blvd., Suite 300
Chattanooga, Tennessee 37421-6061
Telephone: 423.643.5970

Ronald Drumeller
Executive Director

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EMISSION UNIT SUMMARY

The emission units regulated by this permit are the following:

Emission Unit No.	Description
001	Babcock & Wilcox Boilers #1 and #2
002	Paperboard Manufacturing Process
003	Paperboard Trim Conveying System

CONDITIONS OF GENERAL APPLICABILITY

This permittee, Sonoco Products Company, is subject to each of the conditions expressed below and is required to comply with them throughout the term of this Part 70 permit. By accepting this permit and operating under it, Sonoco Products Company agrees to comply with all terms, provisions, limitations, and requirements herein.

Where the term “Chattanooga Air Pollution Control Ordinance” is used in this permit, it means Part II, Chapter 4, of the Chattanooga City Code and any provisions of amendatory ordinances enacted subsequent to the date of the most recent codification of the Chattanooga City Code. ALL SECTIONS OF BOTH THE CHATTANOOGA AIR POLLUTION CONTROL ORDINANCE AND THE CODE OF FEDERAL REGULATIONS CITED IN THIS PERMIT ARE INCORPORATED HEREIN BY REFERENCE. Section numbers referred to in this permit which are not otherwise identified refer to sections in the Chattanooga Air Pollution Control Ordinance.

- 1.0 **Definitions.** Unless specifically defined within a provision of the Chattanooga Air Pollution Control Ordinance referenced elsewhere in this permit, the definitions in §4-2 and §4-53 shall apply. §4-2; §4-53

- 2.0 **Severability.** If any provision, part of a provision, sentence, clause, or phrase in this permit is for any reason declared to be unconstitutional or otherwise invalid by any court of competent jurisdiction, such decision shall not affect the validity of any other portion of this permit, and only such invalid portion shall be elided. §4-57(a)(5)

- 3.0 **Compliance.**
 - 3.1 The permittee must comply with all conditions of this Part 70 permit. Noncompliance with any permit provision constitutes a violation of either the Chattanooga Air Pollution Control Ordinance; the Tennessee Air Quality Act, T.C.A. 68-201-101 *et seq.*; and/or the federal Clean Air Act, as amended, Title 42 United States Code (U.S.C.) §7401 *et seq.* and is grounds for joint or several enforcement action; for permit termination, revocation, or modification; or for denial of a permit renewal application. Enforcement by the Chattanooga-Hamilton County Air Pollution Control Board (the Board) or the Director of the Chattanooga-Hamilton County Air Pollution Control Bureau (the Bureau) shall be conducted in accordance with the provisions of §4-4, §4-7, §4-14, §4-15, §4-17, §4-18, §4-20, §4-61, §4-62, §4-63, §4-64, and §4-65, as appropriate to the circumstances. §4-57(a)(6)(i)

 - 3.2 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. §4-57(a)(6)(ii)

- 3.3 This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination; or the filing of a notification of planned changes or anticipated noncompliance does not stay any condition in this permit. *§4-57(a)(6)(iii)*
- 3.4 Annual compliance certifications shall be submitted by **March 16** of each year throughout the term of this permit. Separate compliance certifications shall be submitted to:

Chattanooga-Hamilton County Air Pollution Control Bureau
CBL Center II
2034 Hamilton Place Blvd., Suite 300
Chattanooga, TN 37421-6061

And to:

U.S. EPA Region 4
Air Permits Section
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW, Suite 9T25
Atlanta, GA 30303-8960

Each such compliance certification shall include the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):

- 3.4.1 Identification of each term or condition of the permit that is the basis of the certification; *§4-57(c)(5)(iii)(A)*
- 3.4.2 Compliance status; *§4-57(c)(5)(iii)(C)*
- 3.4.3 Whether compliance was continuous or intermittent; *§4-57(c)(5)(iii)(B)*
- 3.4.4 The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with *§4-57(a)(3)*; *§4-57(c)(5)(iii)(B)*
- 3.4.5 Where any specific emission test method requires quality assurance audit samples and the audit result does not validate the source's sample within the specified parameters, the source must retest until such time as the audit result does validate the sample within the specified parameters; except that the Bureau Director may waive retesting if the source's emission test

sample is in compliance with this permit even if not validated within the specified quality assurance parameters; §4-3(d)

- 3.4.6 Such other facts as the Board or the Bureau Director may require to determine the compliance status of the Part 70 source; and §4-57(c)(5)(iii)(D)
- 3.4.7 Such additional requirements as may be required for enhanced monitoring compliance certification under Title 42 U.S.C. §7414(a)(3) and §7661c(b) of the Clean Air Act. §4-57(c)(5)(v)

The annual compliance period that is covered by each compliance certification shall be the previous calendar year from **January 1 through December 31**. §4-57(c)(5)

- 3.5 The methods set forth in §4-3 shall be applicable for determining compliance with all terms, provisions, limitations, and requirements contained in this permit, except where otherwise specifically provided in this permit. §4-3
- 4.0 **Property Rights.** This permit does not convey any property rights of any sort or any exclusive privilege. This permit is not assignable except as provided in §4-58(d)(1)(iv). §4-57(a)(6)(iv)
- 5.0 **Information to be furnished.** The permittee shall furnish to the Bureau Director, within a reasonable period of time, any information that the Board or the Bureau Director may request in writing to determine whether cause exists for modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board or the Bureau Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the U.S. Environmental Protection Agency (EPA) along with a claim of confidentiality. Eligibility for confidential treatment shall be determined by the Board pursuant to the provisions of §4-19 for information submitted directly to the Bureau Director. An independent determination regarding confidentiality would be made by the Administrator of the U.S. EPA for information submitted directly to the Administrator. §4-57(a)(6)(v)
- 6.0 **Fees.** The permittee shall pay fees to the Bureau Director consistent with the fee provisions set forth in §4-60. §4-57(a)(7)
- 7.0 **Changes Provided for by Permit.** No permit revision shall be required under any economic incentives, marketable permits, emissions trading, or similar program or process which is included in the Chattanooga City Code, Part II, Chapter 4, Article III, for changes that are provided for in this permit pursuant to such program or process. §4-57(a)(8)

- 8.0 **Reasonably Anticipated Operating Scenarios.** Contemporaneously with making a change from one operating scenario to another, the permittee must record in a log at the Part 70 source premises a record of the scenarios under which it is operating. §4-57(a)(9)
- 9.0 **Acid Precipitation Requirements.** Where an applicable requirement of the Clean Air Act is more stringent than an applicable requirement of regulations promulgated under Title IV of the Clean Air Act and incorporated by reference at §4-52(d), both provisions are herein incorporated into this permit by reference and shall be legally enforceable. This source does not lawfully hold any allowance under Title IV of the Clean Air Act. §4-57(a)(1)(ii)
- 10.0 **Federal Enforceability.** All terms and conditions in this Part 70 permit, including any provisions designed to limit the potential to emit of this Part 70 source, are enforceable by the Administrator of the U.S. EPA and by citizens pursuant to the applicable citizen suit provisions under Section 304 of the Clean Air Act (Title 42 U.S.C. §7604) except for the following, which are locally enforceable only:
- 10.1 §4-41, Rule 12 (Regulation of Odors in the Ambient Air) and
- 10.2 §4-41, Rule 14 (Nuisances).

Any terms and conditions included in the permit that are not required under the Clean Air Act or under any of its applicable requirements are specifically designated in this permit as not being federally enforceable under the Clean Air Act. §4-57(b)

- 11.0 **Inspection of Permitted Source(s).** Upon presentation of identification and in the performance of their duties, the permittee shall allow the Bureau Director and other Bureau employees to perform the following:
- 11.1 Enter upon the permittee's premises or buildings where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- 11.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- 11.3 Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- 11.4 Sample or monitor substances or parameters, and collect and preserve evidence for the purpose of assuring compliance with the permit or applicable requirements thereunder at reasonable times and for taking such other actions as are appropriate under the law in accordance with Item 3.1 of these Conditions of General Applicability.

- 11.5 For the purposes of Items 11.2, 11.3, and 11.4 of these Conditions of General Applicability, “reasonable times” shall be considered to be customary business hours, unless reasonable cause exists to suspect noncompliance with the Chattanooga Air Pollution Control Ordinance or any “applicable requirement,” as defined in §4-53, or with any permit issued thereunder, and the Bureau Director specifically authorizes a designee to inspect a facility at any other time.
- 11.6 In the alternative, the Bureau Director, other Bureau employees, or any other law enforcement officer may obtain a search warrant to obtain, collect, and preserve evidence.

§4-16; §4-57(c)(2)

12.0 **Recordkeeping and Reporting.**

- 12.1 **Record Retention Requirements.** All required monitoring data and related support information shall be retained by the permittee for **five (5) years** after the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and logs and copies of all reports required by the permit. §4-57(a)(3)(ii)(B)
- 12.2 **Reporting of Emission Limitation Exceedances.** The permittee shall promptly notify the Bureau Director **within twenty-four (24) hours** of any **emission limitation exceedance**. A written report shall be submitted to the Bureau Director **within seven (7) days** of the onset of the exceedance. The report shall include the probable cause of the exceedance and any corrective actions or preventive measures that were taken. §4-57(a)(3)(iii)(B); §4-57(c)(1)

Any excess emissions that create an **imminent hazard requiring immediate action to protect health or safety** must be **reported by telephone immediately** to the Bureau Director, to the Hamilton County Local Emergency Planning Committee, to the Tennessee Emergency Management Agency, and to the National Response Center. §4-12(e)(2)

- 13.0 **Emergency Provision.** If the Bureau Director or the Administrator of the Chattanooga-Hamilton County Health Department finds that a condition of air pollution exists or is likely to exist, and that it creates any emergency requiring immediate action to protect human health or safety, the mayor with the concurrence of the Bureau Director or the Administrator of the Chattanooga-Hamilton County Health Department shall order persons causing or contributing to the air pollution to reduce or discontinue immediately the emission of air pollutants. Upon issuance of any such order, the Bureau Director shall fix a place and time, not later than twenty-four (24) hours thereafter, for a hearing to be held before the Board. Not more than twenty-four (24) hours after commencement of such

hearing, and without adjournment thereafter, the Board shall affirm, modify, or recommend to the mayor that the order be affirmed, modified, or set aside. §4-20

14.0 **Certification.** Any application form, report, or compliance certification submitted pursuant to this permit shall contain a certification, as defined in §4-53, by a responsible official, as defined in §4-53, of truth, accuracy, and completeness. Any certification required by this permit shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. §4-56(d)

15.0 **Modifications.**

15.1 **Administrative amendments** to this permit shall be requested and may be granted in accordance with §4-58(d), and only for the reasons set forth therein. The permittee is required to submit an application for an administrative amendment within sixty (60) days after a change of the name of the permittee is registered with the Tennessee Secretary of State. §4-58(d)

15.2 **Minor permit modifications** to this permit shall be requested and may be granted in accordance with §4-58(e)(1) and (2). §4-58(e)(1) and (2)

15.3 **Significant permit modifications** to this permit shall be requested and may be granted in accordance with §4-58(e)(3). §4-58(e)(3)

15.4 **Operational flexibility** allows changes within this permitted source without requiring a permit revision, if the changes are not modifications under Title I of the Clean Air Act and the changes do not exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions), provided that:

15.4.1 The permittee provides the U.S. EPA and the Bureau Director with written notification at least seven (7) days in advance of the proposed changes; and

15.4.2 For each such change, said written notification shall include a brief description of the change within the permitted source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

The permit shield described in §4-57(f) shall not apply to any change made pursuant to operational flexibility. §4-58(i)

15.5 Installation permit application and issuance requirements in §4-8(a) will apply to this permittee and emission units located at this Part 70 source if modifications to or new construction of a Part 70 source are subject to the following:

15.5.1 §4-41, Rule 18 (Prevention of Significant Air Quality Deterioration);

15.5.2 §4-41, Rule 25.3 (General Provisions and Applicability for Volatile Organic Compounds – Standards for New Sources);

15.5.3 §4-41, Rule 23 (General Provisions and Applicability for Process Gaseous Emissions Standards);

15.5.4 Any standard or other requirement pursuant to regulations promulgated under Title 42 U.S.C. §7411 in Title 40 *Code of Federal Regulations* Part 60;

15.5.5 Case-by-case determinations made pursuant to Title 42 U.S.C. §7412(g) and (j) as set forth at §4-53 “Applicable requirements (4)”; or

15.5.6 Case-by-case determinations made pursuant to §4-41, Rule 27 (Particulate Matter Controls for New Sources and New Modifications After August 29, 1995).

§4-50

16.0 **Off-Permit Changes.**

16.1 An off-permit change is one that:

16.1.1 Is not addressed or prohibited by the permit;

16.1.2 is not a modification under Title I of the Clean Air Act;

16.1.3 is not subject to any requirements under Title IV of the Clean Air Act;

16.1.4 Meets all applicable requirements, as described in this permit; and

16.1.5 Does not violate, or cause or contribute to a violation of, any existing permit term or condition.

16.2 A contemporaneous notification shall be submitted to the Bureau Director and to the U.S. EPA except for changes that qualify as insignificant under §4-56(c)(11) and (12).

16.3 The permittee shall keep a record describing off-permit changes made at the Part 70 source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.

16.4 The permit shield described in §4-57(f) shall not apply to any change made pursuant to off-permit changes.

§4-58(j)

17.0 **Permit Reopening**. This permit shall be reopened and revised under any of the following circumstances, as set forth at §4-58(f)(1):

17.1 Additional applicable requirements become applicable by amendment of the Chattanooga Air Pollution Control Ordinance to this source and the remaining permit term is three (3) or more years. Such reopening shall be completed no later than eighteen (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;

17.2 Additional requirements (including excess emissions requirements) become applicable to an affected source as defined in §4-53. Upon approval by the Administrator of the U.S. EPA and amendment of the Chattanooga Air Pollution Control Ordinance, excess emissions offset plans shall be incorporated into the permit;

17.3 The Board, the Bureau Director, or the Administrator of the U.S. EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

17.4 The Board, the Bureau Director, or the Administrator of the U.S. EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

Proceedings to reopen and issue a revised permit shall follow the same procedures as apply to initial permit issuance, described in §4-58, and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable, but only after notice of such intent is provided to this permittee by the Bureau Director at least thirty (30) days in advance of the date that permit is to be reopened. A shorter time period may be provided in the case of an emergency. *§4-58(f)*

This permit is also subject to reopening for cause by the U.S. EPA, as described in §4-58(g).
§4-58(g)

18.0 **Rules Applicable to All Permittee Activities.** The following conditions apply to all activities of this permittee, including insignificant activities:

- 18.1 **Nitrogen Oxides.** The permittee shall comply with §4-41, Rules 2.4, 2.5, and 2.7, regarding emissions of nitrogen oxides.
- 18.2 **Visible Emissions.** The permittee shall comply with §4-41, Rule 3, which stipulates that the opacity of visible emissions shall not exceed twenty (20) percent for an aggregate of more than five (5) minutes in any one-hour period or more than twenty (20) minutes in any twenty-four-hour period. The permittee shall also comply with §4-41, Rule 9, regarding visible emissions from internal combustion engines. In addition, the permittee shall comply with §4-41, Rule 11, which stipulates that the opacity of visible emissions from the handling, processing, or storage of any material in the open air shall not exceed twenty (20) percent for more than three (3) minutes in any consecutive sixty-minute period or more than twenty (20) minutes in any twenty-four-hour period. §4-3(c)(9)
- 18.3 **Certain Fuels.** The permittee shall comply with §4-41, Rule 4, regarding importation, sale, transportation, use, or consumption of fuels containing in excess of four (4) percent sulfur by weight.
- 18.4 **Prohibition of Hand-Fired Fuel-Burning Equipment.** The permittee shall comply with §4-41, Rule 5, regarding the prohibition of the use of hand-fired fuel-burning equipment with solid fuels.
- 18.5 **Open Burning.** The permittee is prohibited from conducting open burning except in accordance with §4-41, Rule 6.
- 18.6 **Fuel-Burning Equipment.** The permittee shall comply with §4-41, Rule 8, regarding particulate matter emissions from fuel-burning equipment.
- 18.7 **Process Emissions.** The permittee shall comply with §4-41, Rule 10, regarding process particulate matter emissions.
- 18.8 **Odors in Ambient Air.** The permittee shall comply with §4-41, Rule 12, regarding emissions of objectionable odors. (*Local rule only*)
- 18.9 **Sulfur Oxides.** The permittee shall comply with §4-41, Rule 13, regarding emissions of sulfur oxides.
- 18.10 **Nuisances.** The permittee shall comply with §4-41, Rule 14, regarding discharges from any source of air contaminants or other material which shall cause a nuisance. (*Local rule only*)

- 18.11 Hazardous Air Pollutants. The permittee shall comply with §4-41, Rules 16.1 through 16.4, regarding emission standards for hazardous air pollutants other than asbestos.
- 18.12 Asbestos – Demolition or Renovation. The permittee shall comply with §4-41, Rules 17.5, 17.10, 17.12, and 17.13, when conducting any demolition or renovation activities at the permitted source.
- 18.13 Stack Heights. The permittee shall comply with §4-41, Rule 22, regarding good engineering practice stack heights.
- 18.14 Particulate Matter Controls for New Sources and New Modifications. The permittee shall comply with §4-41, Rule 27, regarding particulate matter controls for any new source or modification for which installation commences after August 29, 1995.
- 19.0 **Stratospheric Ozone and Climate Protection**. The permittee is subject to the standards for recycling and emissions reduction promulgated at Title 40 *Code of Federal Regulations* Part 82, Subpart F, including the use of certified technicians only. §4-53
- 20.0 **Dismantled Equipment**. The permittee shall report the permanent discontinuance or dismantlement of any equipment or activity covered by this permit to the Bureau Director within thirty (30) days. §4-11(a)
- 21.0 **Monitoring**. All monitoring and related reporting shall be conducted in compliance with §4-57(a)(3). §4-57(a)(3)
- 22.0 **Applicable Requirements**. In addition to the Conditions of General Applicability, Conditions Applicable to the Entire Facility, and Emission Unit Special Conditions in this permit, “applicable requirements” as defined in §4-53 shall apply. §4-57(a)(1)
- 23.0 **Basis of Permit**. This permit is being issued based on the statements made and the information provided in the Part 70 permit application submitted under oath by this source. §4-56

CONDITIONS APPLICABLE TO THE ENTIRE FACILITY

- 1.0 **Semiannual Compliance Monitoring Reports**. In addition to reports that are required by the Conditions of General Applicability, a semiannual compliance monitoring report shall be submitted by **March 16** and **September 16** of each year throughout the term of this permit. The compliance monitoring report shall be submitted to:

Chattanooga-Hamilton County Air Pollution Control Bureau
CBL Center II
2034 Hamilton Place Blvd., Suite 300
Chattanooga, TN 37421-6061

Each such compliance monitoring report shall include the following information:

- 1.1 The annual **quantities of natural gas, No. 2 fuel oil, and No. 6 fuel oil** that were burned in Babcock & Wilcox Boilers #1 and #2 (**Emission Unit 001**) combined during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period);
- 1.2 The single **highest sulfur content**, in units of percentage by weight, of any shipment of **No. 2 fuel oil** and of any shipment of **No. 6 fuel oil** that were received at the plant for combustion in Babcock & Wilcox Boiler #1 or #2 (**Emission Unit 001**) during the reporting period;
- 1.3 A summary of information pertaining to the paperboard manufacturing process (**Emission Unit 002**) that shall include the following:
 - 1.3.1 The annual **quantity of raw materials** (waste paper) that was used during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period);
 - 1.3.2 The annual **quantity of paperboard** that was produced during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period);
 - 1.3.3 The identity and annual **quantity of each volatile organic compound (VOC) or hazardous air pollutant (HAP)-containing chemical** that was used in the process during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period);
 - 1.3.4 A **current safety data sheet, current environmental data sheet, or current written certification from the supplier** indicating the VOC and HAP contents for each chemical either that began to be used in the process

during the reporting period or for which the VOC or HAP content changed during the reporting period;

- 1.3.5 The annual **VOC emissions** that resulted from the process during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period);
 - 1.3.6 The annual **emissions of each individual HAP** that resulted from the process during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period); and
 - 1.3.7 The annual **emissions of combined HAPs** that resulted from the process during the preceding **twelve (12) calendar months** (ending on the last day of the reporting period); and
- 1.4 A detailed summary of **emission limitation exceedances** (including those attributable to malfunctions) **and all other deviations from permit requirements** during the reporting period. For each such incident, the nature and cause of the incident, affected equipment, calendar date, beginning time, and elapsed time shall be included in the summary. Furthermore, for each incident of an emission limitation exceedance, the estimated resulting emissions shall be included in the summary. *§4-57(a)(3)(iii)(A); §4-57(c)(1)*

The six (6)-month reporting period that is covered by each compliance monitoring report that is due on March 16 shall be from **July 1 through December 31** of the previous year. The six (6)-month reporting period that is covered by each compliance monitoring report that is due on September 16 shall be from **January 1 through June 30** of the current year. *§4-57(a)(3)(iii)(A)*

EMISSION UNIT SPECIAL CONDITIONS

Emission Unit 001 – Babcock & Wilcox Boilers #1 and #2

- 1.0 Only natural gas, No. 2 fuel oil, and No. 6 fuel oil may be burned in Babcock & Wilcox Boilers #1 and #2. The sulfur content of the No. 2 fuel oil that is burned in the two boilers shall not exceed **15 parts per million (0.0015 percent)** by weight. The sulfur content of the No. 6 fuel oil that is burned in the two boilers shall not exceed **2.0 percent** by weight. (Each of these boilers has a heat input capacity of 104.7×10^6 Btu/hour.) §4-57(a)(1)
 - 2.0 Preventative maintenance on Boilers #1 and #2 shall be performed at regular intervals in accordance with the permittee's maintenance procedures. §4-57(a)(1)
 - 3.0 No more than **3,500,000 gallons** of No. 2 fuel oil and No. 6 fuel oil combined shall be burned in Boilers #1 and #2 combined **during any period of twelve (12) consecutive calendar months.** §4-57(a)(1)
 - 4.0 Boilers #1 and #2 are subject to and the permittee shall comply with "National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources," Title 40 *Code of Federal Regulations* Part 63, Subpart JJJJJJ, which includes the following requirements:
 - 4.1 A **performance tune-up** of each of the two boilers shall be conducted every **two years [no more than twenty-five (25) months apart]**; and
 - 4.2 A log shall be maintained, on the premises, in which the **quantities of natural gas, No. 2 fuel oil, and No. 6 fuel oil** that are burned in the two boilers combined during each **calendar month** are recorded. In addition, the annual quantity of No. 2 fuel oil and No. 6 fuel oil combined that is burned in the two boilers combined shall be totaled in this log for each **rolling twelve (12)-calendar month period.**
- §4-57(c)(1); §4-41, Rule 16.5(c) (40 CFR 63.11193–11237)
- 5.0 The sulfur content of each shipment of No. 2 fuel oil or No. 6 fuel oil that is received at the plant for combustion in Boiler #1 or #2 shall be documented by a certification from the supplier, and each such certification shall be maintained on the premises. §4-57(c)(1)
 - 6.0 The maximum allowable emissions of particulate matter from Boilers #1 and #2 are 0.1103 pound per 10^6 Btu. For each boiler, this emission limitation is equivalent to 11.55 pounds/hour for the operation of the boiler at its heat input capacity. This emission limitation is reasonably available control technology (RACT). §4-41, Rule 26.6

- 7.0 Visible emissions from Boilers #1 and #2 shall not exceed twenty (20) percent opacity for an aggregate of more than five (5) minutes in any period of one hour or more than twenty (20) minutes in any period of twenty-four hours. *§4-41, Rule 3*
- 8.0 Testing of either Boiler #1 or #2 to determine the emissions of particulate matter, sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO) and to determine the opacity of the emissions may be required by the Bureau Director. If required, these tests shall consist of and be performed in accordance with test methods approved by the U.S. EPA and be performed in accordance with §4-3. *§4-3; §4-8(c)(8); §4-57(c)(1)*

Emission Unit 002 – Paperboard Manufacturing Process

- 1.0 Chemicals such as fiber retention aids, sizing agents, strength aids, felt cleaners, and water microbiological control agents are used in the paperboard manufacturing process. The volatile organic compound (VOC) content and individual hazardous air pollutant (HAP) contents of each process chemical that is used in the process shall be documented by a current safety data sheet, current environmental data sheet, or current written certification from the supplier, and each such data sheet or certification shall be maintained on the premises. §4-57(c)(1)
- 2.0 **VOC emissions** resulting from the paperboard manufacturing process shall not exceed **50.0 tons during any period of twelve (12) consecutive calendar months**. This emission limitation is best available control technology (BACT), as determined by the Bureau Director. §4-41, Rule 25.3
- 3.0 **Emissions of each individual HAP** resulting from the paperboard manufacturing process shall not exceed **8.20 tons during any period of twelve (12) consecutive calendar months**. This emission limitation is both “reasonable and proper” and BACT, as determined by the Bureau Director. §4-41, Rules 23 and 25.3
- 4.0 **Emissions of combined HAPs** resulting from the paperboard manufacturing process shall not exceed **22.70 tons during any period of twelve (12) consecutive calendar months**. This emission limitation is both “reasonable and proper” and BACT, as determined by the Bureau Director. §4-41, Rules 23 and 25.3
- 5.0 A log shall be maintained, on the premises, in which the **quantity of raw materials** (waste paper) used and the **quantity of paperboard** produced in the paperboard manufacturing process during each **calendar month** and the **monthly emissions of each individual HAP** (methanol, acetaldehyde, formaldehyde, and propionaldehyde) resulting directly from such production are recorded. The identity and **quantity of each VOC or HAP-containing chemical** used in the process during each **calendar month** and the **monthly VOC emissions and emissions of each individual HAP** resulting from such use of each chemical shall also be recorded in the log. In addition, the annual VOC emissions, annual emissions of each individual HAP, and annual emissions of combined HAPs resulting from the entire process shall be totaled in this log for each **rolling twelve (12)-calendar month period**. §4-57(c)(1)

Emission Unit 003 – Paperboard Trim Conveying System

- 1.0 The maximum allowable emissions of particulate matter from the paperboard trim conveying system are 3.98 pounds per hour. *§4-41, Rule 10.3*
- 2.0 Visible emissions from the two cyclones of the paperboard trim conveying system shall not exceed ten (10) percent opacity for an aggregate of more than fifteen (15) minutes in any period of one hour or more than sixty (60) minutes in any period of twenty-four hours. This limitation is reasonably available control technology (RACT). *§4-41, Rule 26.11*
- 3.0 Visible emissions from the two cyclones of the paperboard trim conveying system shall not exceed twenty (20) percent opacity for an aggregate of more than five (5) minutes in any period of one hour or more than twenty (20) minutes in any period of twenty-four hours. *§4-41, Rule 3*
- 4.0 Testing of either of the two cyclones of the paperboard trim conveying system to determine the emissions of particulate matter and to determine the opacity of the emissions may be required by the Bureau Director. If required, these tests shall consist of and be performed in accordance with test methods approved by the U.S. EPA and be performed in accordance with §4-3. *§4-3; §4-8(c)(8); §4-57(c)(1)*

PERMIT SHIELD

At the request of the responsible official who signed and certified to the Part 70 permit application, compliance with the conditions of this permit shall be deemed compliance with any “applicable requirements,” as defined in §4-53, as of the date of permit issuance that (1) are included and specifically identified in this permit, or (2) have been determined in writing in this permit not to be applicable to this permittee as specifically identified. This permit shield does not alter or affect the following:

- 1.0 The provisions of Title 42 U.S.C. §7603 (emergency orders), including the authority of the Administrator of the U.S. EPA, the Board, or the Bureau Director thereunder; §4-57(f)(3)(i)
- 2.0 The liability of a permittee of a source for any violation of applicable requirements prior to or at the time of permit issuance; §4-57(f)(3)(ii)
- 3.0 The applicable requirements of the acid rain program promulgated under Title IV of the Clean Air Act consistent with Title 42 U.S.C. §7651g(a); §4-57(f)(3)(iii)
- 4.0 The ability of the U.S. EPA to obtain information from a source pursuant to Title 42 U.S.C. §7414, or of the Board or the Bureau Director to obtain information from a source pursuant to the Chattanooga Air Pollution Control Ordinance or any other provision of local, state, or federal law; and §4-57(f)(3)(iv)
- 5.0 The right of any person to damages or other relief on account of injury to persons or property and to maintain any action or other appropriate proceeding therefor; nor does it abridge, limit, impair, create, enlarge, or otherwise affect substantively or procedurally this right. §4-5(1)

§4-57(f)