Simple

air contaminant discharge permit

Department of Environmental Quality

This permit is being issued in accordance with the provisions of ORS 468A.040 and

based on the land use compatibility findings included in the permit record.

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| ISSUED TO:  International Paper Company  1601 NE 192nd Avenue  Portland, OR 97230 | INFORMATION RELIED UPON:  Application No.: 023554  Date Received: 12/11/2008 |
| PLANT SITE LOCATION:  Portland Containerboard Packaging  1601 NE 192nd Avenue  Portland, OR 97230 | LAND USE COMPATIBILITY FINDING:  Approving Authority: City of Gresham  Approval Date: 2/17/1994 |
|  | PERMIT PREVIOUSLY ISSUED TO:  Weyerhaeuser Company  1601 NE 192nd Avenue  Portland, OR 97230 |
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**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

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Air Quality Manager Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-0020):

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| **Table 1 Code** | **Source Description** | **SIC/**  **NAICS** |
| Part B, 75 | Source that would emit 10 tons/year or more of a criteria pollutant if operated uncontrolled (containerboard mfg.) | 2653/  322211 |
|  | Boiler greater than 10 MM Btu/hr input, natural gas fired with diesel back-up | 4961/  221330 |

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# GENERAL emission standards AND LIMITS

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| Visible Emissions | The permittee must comply with the following visible emission limits, as applicable: |
|  | Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour. |
|  | Emissions from any air contaminant source other than the boiler must not equal or exceed 20% opacity for a period aggregating more than 30 seconds in any one hour. |
| Particulate Matter Emissions | The permittee must comply with the following particulate matter emission limits, as applicable: |
|  | Particulate matter emissions from the boiler must not exceed 0.1 grains per standard cubic foot, corrected to 12% CO2 or 50% excess air. |
|  | Particulate matter emissions from any air contaminant source installed, constructed, or modified after June 1, 1970 other than the boiler and fugitive emission sources must not exceed 0.1 grains per standard cubic foot. |
| Fugitive Emissions | The permittee must take reasonable precautions to prevent fugitive dust emissions by: |
|  | Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times. |
|  | Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer. |
| Particulate Matter Fallout | The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. |
| Nuisance and Odors | The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel. |
| Fuels and Fuel Sulfur Content | The permittee must not use any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used oil. |
|  | Fuel oils must not contain more than: |
|  | 0.3% sulfur by weight for ASTM Grade 1 distillate oil; |
|  | 0.5% sulfur by weight for ASTM Grade 2 distillate oil; |
|  | 1.75% sulfur by weight for residual oil; |
|  | The permittee is allowed to use on-specification used oil as fuel which contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1. |

# Operation and Maintenance Requirements

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| Work practices | The permittee must perform a maintenance service on the boiler at least once in every 2-year period. As a minimum, the service must include an inspection of the burners and refractory chamber; cleaning, adjustment, and repair as necessary. For water tube boilers, the service must include flushing the tubes. |

# plant site emission limits

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| Plant Site Emission Limits (PSEL) | Plant site emissions must not exceed the following: | | |
| **Pollutant** | **Limit** | **Units** |
| PM | 24 | tons per year |
| PM10 | 14 | tons per year |
| SO2 | 39 | tons per year |
| NOX | 39 | tons per year |
| CO | 99 | tons per year |
| VOC | 39 | tons per year |

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| --- | --- | --- | --- |
|  | Single HAP | 9 | tons per year |
| Combined HAPs | 24 | tons per year |
|  |  | | |
| Annual Period | The annual plant site emissions limits apply to any 12-consecutive calendar month period. | | |

# compliance demonstration

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| PSEL Compliance Monitoring | Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:  E = Σ(EF x P)/2000 lbs  where,  E = pollutant emissions (tons/yr);  EF = pollutant emission factor (see Condition );  P = process production (see Condition 5.1) |
| Emission Factors | The permittee must use the default emission factors provided in condition for calculating pollutant emissions, unless alternative emission factors are approved by the Department. The permittee may request or the Department may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by the Department. |
| Mass Balance without controls | Annual VOC/HAP emissions for each 12 consecutive calendar month period are calculated by the following formula:  EVOC-A = [∑(CX \* DX \* KX) – W] x 1ton/2000 pounds  Where,  EVOC-A = Annual VOC emissions in tons  C = Material usage for the period in gallons  D = Material density in pounds per gallon  K = VOC/HAP concentration expressed as a decimal  X = Subscript X represents a specific material  W = Weight of VOC shipped offsite |
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# recordkeeping requirements

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| Operation and Maintenance | The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices on a monthly basis: |
|  | Quantity of natural gas combusted, in million cubic feet; |
|  | Quantity and type of fuel oils combusted, in thousand gallons; |
|  | Hours of operation of the corrugators; |
|  | Quantity of inks used, in pounds;Quantity of scrap paper/containerboard baled, in tons;Weighted average VOC content of inks, in percent;Gallons of VOC/HAP containing materials used, and percent of HAP, by weight;Gallons of VOC/HAP waste material shipped off site;Calculations required in Conditions 4.1 and 4.3;Percentage of containerboard that has been waxed |
| Excess Emissions | The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by the Department in accordance with OAR 340-214-0330(4). |
| Complaint Log | The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee’s actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. |
| Retention of Records | Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the Department upon request. |

# reporting requirements

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| Excess Emissions | The permittee must notify the Department of excess emissions events if the excess emission is of a nature that could endanger public health. |
|  | Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 8.3 by e-mail, telephone, facsimile, or in person. |
|  | If the excess emissions occur during non-business hours, the permittee must notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311. |
|  | The permittee must also submit follow-up reports when required by the Department. |
| Annual Report | For each year this permit is in effect, the permittee must submit to the Department by **February 15** two (2) copies of the following information for the previous calendar year: |
|  | Operating parameters: |
|  | Calculations required in Condition 4.0, these may be in the form of a spreadsheet. |
|  | The date of the last boiler tune-up, and any major repairs completed.Average percentage of containerboard waxed. |
|  | A summary of annual pollutant emissions determined each month in accordance with Condition 5.1. |
|  | Records of all planned and unplanned excess emissions events. |
|  | Summary of complaints relating to air quality received by permittee during the year. |
|  | List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions. |
|  | List major maintenance performed on pollution control equipment. |
| Notice of Change of Ownership or Company Name | The permittee must notify the Department in writing using a Departmental “Permit Application Form” within 60 days after the following: |
| Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or |
| Sale or exchange of the activity or facility. |
| Construction or Modification Notices | The permittee must notify the Department in writing using a Departmental “Notice of Construction Form,” or “Permit Application Form,” and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before: |
| Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions; |
| Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or |
| Constructing or modifying any air pollution control equipment. |
| Where to Send Reports and Notices | The reports, with the permit number prominently displayed, must be sent to the Field office for the region where the source is located as identified in condition 8.3 |

# Administrative requirements

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| Permit Renewal Application | The completed application package for renewal of this permit is due on 11/01/2013. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in Condition 8.2. |
| Permit Modifications | Application for a modification of this permit must be submitted not less than **60** days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the Business Office of the Department. |

# DEQ Contacts / Addresses

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| Business Office | The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ’s Business Office: |

Department of Environmental Quality

Business Office

811 SW Sixth Avenue

Portland, Oregon 97204-1390

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| Permit Coordinator | The permittee must submit all Notices and applications that do not include payment to the Northwest Region’s Permit Coordinator: |

Department of Environmental Quality

Northwest Region

2020 SW 4th Avenue, Suite 400

Portland, OR 97201-4987

Telephone: (503) 229-5582

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| Field Office | Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to field office noted below. |

Department of Environmental Quality

NWR-ESO/AQ

1550 NW Eastman Pkwy, Suite 290

Gresham, OR 97030

Telephone: (503) 667-8414

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| Web Site | Information about air quality permits and the Department’s regulations may be obtained from the DEQ web page at [www.deq.state.or.us](http://www.deq.state.or.us) |

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# fees

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| Annual Compliance Fee | The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a Simple ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by Department regulations, will be mailed prior to the above date. **Late fees in accordance with Part 4 of the table will be assessed as appropriate.** |
| Change of Ownership or Company Name Fee | The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company. |
| Special Activity Fees | The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit. |
| Where to Submit Fees | Fees must be submitted to:  Department of Environmental Quality  Business Office  811 SW Sixth Avenue  Portland, Oregon 97204-1390 |

# general conditions and disclaimers

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| Permitted Activities | This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked. |
| Other Regulations | In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the Department. |
| Conflicting Conditions | In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. |
| Masking of Emissions | The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. |
| Department Access | The permittee must allow the Department’s representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095. |
| Permit Availability | The permittee must have a copy of the permit available at the facility at all times. |
| Open Burning | The permittee may not conduct any open burning except as allowed by OAR 340 Division 264. |
| Asbestos | The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance. |
| Property Rights | The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. |
| Permit Expiration | A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit:A timely and complete application for renewal or for an Oregon Title V operating Permit has been submitted, orAnother type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. |
| Permit Termination, Revocation, or Modification | The Department may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084. |

# Emission Factors

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| **Emissions device or activity** | **Pollutant** | **Emission Factor (EF)** | **EF units** | **EF reference** |
| Natural gas combustion | PM10 | 7.6 | lb/MMCF | AP-42 |
|  | SO2 | 0.6 | lb/MMCF | AP-42 |
|  | NOX | 100.0 | lb/MMCF | AP-42 |
|  | CO | 84.0 | lb/MMCF | AP-42 |
|  | VOC | 5.5 | lb/MMCF | AP-42 |
| Diesel fuel combustion | PM10 | 2.0 | lb/1,000 Gal. | AP-42 |
|  | SO2 | 71.0 | lb/1,000 Gal. | AP-42 |
|  | NOX | 20.0 | lb/1,000 Gal. | AP-42 |
|  | CO | 5.0 | lb/1,000 Gal. | AP-42 |
|  | VOC | 0.34 | lb/1,000 Gal. | AP-42 |
| Corrugator | PM10 | 0.006 | lb/MSF | Engineer Estimate |
|  | VOC | 0.0082 | lb/MSF | Engineer Estimate |
| Finishing Inks | VOC | 0.05 | lb/lb ink | Mass Balance |
| Scrap Cyclones | PM | 0.83 | lb/ton scrap | Source Test |

# Abbreviations, acronyms, and definitions

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| ACDP | Air Contaminant Discharge Permit |
| ASTM | American Society for Testing and Materials |
| AQMA | Air Quality Maintenance Area |
| calendar year | The 12-month period beginning January 1st and ending December 31st |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| DEQ | Oregon Department of Environmental Quality |
| dscf | dry standard cubic foot |
| EPA | US Environmental Protection Agency |
| FCAA | Federal Clean Air Act |
| gal | gallon(s) |
| gr/dscf | grains per dry standard cubic foot |
| HAP | Hazardous Air Pollutant as defined by OAR 340-244-0040 |
| I&M | inspection and maintenance |
| lb | pound(s) |
| MMBtu | million British thermal units |
| NA | not applicable |
| NESHAP | National Emissions Standards for Hazardous Air Pollutants |
| NOX | nitrogen oxides |
| NSPS | New Source Performance Standard |
| NSR | New Source Review |
| O2 | oxygen |
| OAR | Oregon Administrative Rules |
| ORS | Oregon Revised Statutes |
| O&M | operation and maintenance |
| Pb | lead |
| PCD | pollution control device |
| PM | particulate matter |
| PM10 | particulate matter less than 10 microns in size |
| ppm | part per million |
| PSD | Prevention of Significant Deterioration |
| PSEL | Plant Site Emission Limit |
| PTE | Potential to Emit |
| RACT | Reasonably Available Control Technology |
| scf | standard cubic foot |
| SER | Significant Emission Rate |
| SIC | Standard Industrial Code |
| SIP | State Implementation Plan |
| SO2 | sulfur dioxide |
| Special Control Area | as defined in OAR 340-204-0070 |
| VE | visible emissions |
| VOC | volatile organic compound |
| year | A period consisting of any 12- consecutive calendar months |