BEFORE THE DEPARTMENT OF ENVIRONMENTAL QUALITY

OF THE STATE OF OREGON

IN THE MATTER OF International Paper Company Springfield Mill Permittee.	)))))	STIPULATED AGREEMENT AND FINAL ORDER ORDER NO. 208850

Permittee (International Paper Company - Springfield Mill), Lane Regional Air Protection Agency (LRAPA), and the Department of Environmental Quality (DEQ) hereby agree that:

WHEREAS:

1. Permittee operates a pulp and paper mill located at 801 42nd Street in Springfield, Oregon (the Facility).

2. On June 30, 2005, LRAPA issued Title V Operating Permit No. 208850 (the Permit) to Permittee.

3. On December 14, 2012, LRAPA renewed the Permit.

4. The Permit authorizes Permittee to discharge air contaminants associated with its operation of the Facility in conformance with the requirements, limitations, and conditions set forth in the Permit.

5. As of December 31, 2017, the Permit had the following Plant Site Emission Limits (PSELs) for sulfur dioxide (SO2), particulate matter of ten microns or less (PM10), and nitrogen oxides (NOx), which constitute round II regional haze pollutants, *see* OAR 340-223-0020(2) at the Facility: 1,521 tons per year for SO2, 750 tons per year for PM10 and 1,692 tons per year for NOx (as 12-month rolling averages).

6. The Facility is located 58.9 kilometers from Three Sisters Wilderness Area, which is the nearest Class I Area, *see* OAR 340-200-0020(25), measured in a straight line from the Facility to the Class I Area.

7. Based on the definitions and the formula in OAR 340-223-0100(2) the Facility's Q value is 3963; d value is 58.9, and ratio of Q divided by d is 67.3.

8. Because the Facility has a Title V Operating Permit and because the Facility has a Q/d value of greater than 5.00, the Facility is subject to the requirements of round II of regional haze. *See* OAR 340-223-0100(1).

9. Rather than complying with OAR 340-223-0110(1), the Facility would like to enter into a Stipulated Agreement with DEQ for alternative compliance with round II of regional haze and would like to accept federally enforceable requirements to install and continually operate control devices, monitoring equipment and accept emission limitations to reduce round II regional haze pollutants from the Facility which DEQ shall incorporate into a Final Order. *See* OAR 340-223-0110(2)(b)(A).

I. AGREEMENT

1. DEQ issues this Stipulated Agreement and Final Order (SAFO) pursuant to OAR 340-223-0110(2)(b)(A), and it shall be effective upon the date fully executed.

2. The Facility is subject to round II of regional haze, according to OAR 340-223-0100(1).

3. The Permittee agrees to and must ensure compliance with the PSEL reductions, emission limits, and Continuous Emission Monitoring System (CEMS) installation schedules and conditions in Section II of this SAFO.

4. The PSEL reductions required by this SAFO may not be banked, credited, or otherwise accessed by Permittee for use in future permitting actions.

5. PSELs for this Facility shall not be increased above those established in this SAFO except as approved in accordance with applicable state and federal permitting regulations.

6. The Permittee must calculate compliance with the PSELs in Section II of this SAFO according to the requirements of the Permit.

7. LRAPA shall incorporate this SAFO and the conditions in Section II below into the Permit pursuant to OAR 340-218-200(1)(a)(A), if applicable, or upon permit renewal.

8. DEQ may submit this SAFO to the Environmental Protection Agency as part of the State Implementation Plan under the federal Clean Air Act.

9. Permittee waives any and all rights and objections Permittee may have to the form, content, manner of service, and timeliness of this SAFO and to a contested case hearing and judicial review of the SAFO.

10. In the event EPA does not accept DEQ's Round II Regional Haze State Implementation Plan (SIP) in any manner that impacts the final order, implementation of the Final Order shall be stayed until DEQ and the Permittee modify the Final Order in such a manner as to ensure compliance with the Round II Regional Haze SIP.

11. This SAFO shall be binding on Permittee and its respective successors, agents, and assigns. The undersigned representative of Permittee certifies that he, she, or they are fully authorized to execute and bind Permittee to this SAFO. No change in ownership, corporate, or partnership status of Permittee, or change in the ownership of the properties or businesses affected by this SAFO shall in any way alter Permittee's obligation under this SAFO, unless otherwise approved in writing by DEQ through an amendment to this SAFO.

12. If any event occurs that is beyond Permittee's reasonable control and that causes or may cause a delay or deviation in performance of the requirements of this SAFO, Permittee must immediately notify DEQ verbally of the cause of delay or deviation and its anticipated duration, the measures that Permittee has or will take to prevent or minimize the delay or deviation, and the timetable by which Permittee proposes to carry out such measures. Permittee shall confirm in writing this information within five (5) business days of the onset of the event. It is Permittee's responsibility in the written notification to demonstrate to DEQ's satisfaction that the delay or deviation has been or will be caused by circumstances beyond the control and despite due diligence of Permittee. If Permittee so demonstrates, DEQ may extend times of performance of related activities under this SAFO as appropriate. Circumstances or events beyond Permittee's control include, but are not limited to, extreme and unforeseen acts of nature, unforeseen strikes, work stoppages, fires, explosion, riot, sabotage, or war. Increased cost of performance or a consultant's

failure to provide timely reports are not considered circumstances beyond Permittee's control.

13. Facsimile or scanned signatures on this SAFO shall be treated the same as original signatures.

II. FINAL ORDER

The DEQ hereby enters a final order requiring Permittee to comply with the following schedule and conditions:

1. On and after July 31, 2022, the Permittee's combined assigned PSELs for the Power Boiler, Package Boiler, Lime Kilns and Recovery Furnace for the following pollutants are:
   a. 237 tons per year for SO2, as a 12-month rolling average.
   b. 962 tons per year for NOx, as a 12-month rolling average.
   c. 177 tons per year for PM10, as a 12-month rolling average.
2. Permittee agrees that the only fuel that it may combust in the Power Boiler and Package Boiler at the facility is natural gas, except that it may operate the Power Boiler and Package Boiler on ultra-low sulfur diesel for no more than 48 hours per year and when needed for natural gas curtailments.
3. Permittee agrees that the only fuels that it may combust in the Recovery Furnace are Black Liquor Solids (BLS) and natural gas, except that it may operate the Recovery Furnace on ultra-low sulfur diesel no more than 48 hours per year and when needed for natural gas curtailment.
4. Permittee agrees that the only fuels that it may combust in the Lime Kilns are natural gas, product turpentine and product methanol, except that it may operate the Lime Kilns on ultra-low sulfur diesel no more than 48 hours per year and when needed for natural gas curtailment.
5. By December 31, 2022, Permittee shall install CEMS and measure the emissions of NOx from the Power Boiler. Permittee shall install the CEMS according to the

installation, quality control, and quality assurance requirements detailed in the following:

a. Permittee shall demonstrate proper installation of the CEMS following EPA Procedure 1 (see 40 CFR 60, Appendix F, Procedure 1), Performance Specification 2 (see 40 CFR 60, Appendix B, Performance Specification 2), and DEQ Source Sampling Manual, Rev. 2018, no later than March 31, 2023.

b. Permittee shall submit data collected during testing identified in Section II.5 to DEQ and LRAPA for review.

c. Upon DEQ's and LRAPA's approval of the CEMS certification, Permittee shall use data collected from the CEMS to demonstrate compliance with the NOx emissions rates in Section II.6 & 7.

d. Permittee shall ensure that the CEMS are certified by DEQ and LRAPA no later than May 31, 2023.

e. Permittee shall use the CEMS to document Power Boiler emissions, replacing the equation in Condition 186.g in the LRAPA permit that requires monitoring of the Power Boiler NOx, no later than May 31, 2023.

f. Permittee shall collect and record all data from the NOx CEMS and make that data available to DEQ and/or LRAPA upon request.

6. On and after January 31, 2025, Permittee shall meet the following emission limit:

a. 0.25 lb NOx/MMBtu on a 7-day rolling average from the Power Boiler

7. On and after December 31, 2025, the Permittee's assigned PSEL for the following pollutants and Emission Unit is:

a. 179 tons per year for NOx, as a 12-month rolling average for the Power Boiler.

International Paper (PERMITTEE)

8/9/2021
Date

Signature

Douglas Black
Name (print)

Mill Manager - Springfield Mill
Title (print)

LANE REGIONAL AIR PROTECTION AGENCY

8-9-21
Date

Steven A. Dietrich
Steven A. Dietrich, Director

DEPARTMENT OF ENVIRONMENTAL QUALITY and
ENVIRONMENTAL QUALITY COMMISSION

8/9/2021
Date

Ali Mirzakhalili, Administrator
Air Quality Division
on behalf of DEQ pursuant to OAR 340-223-0110(2)