Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services

STATEMENT OF BASIS

RED RIVER MILL
INITIAL PART 70 PERMIT
WEYERHAEUSER COMPANY
CAMPTI, NATCHITOCHES PARISH, Louisiana
Agency Interest Number: 2645
Activity Number: PER19960001
Draft Permit 1980-00004-VO

I. APPLICANT:

Company:
Weyerhaeuser Company, Inc.
P.O. Box 377, Campti, LA 71411

Facility:
Red River Mill
4537 Highway 480, Campti, Natchitoches Parish, Louisiana
Approximate UTM coordinates are 483.66 kilometers East and 3529.58 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS:

Weyerhaeuser Co, Weyerhaeuser Co - Red River Mill, an existing pulp and paper mill, began operation in 1974 under the Western Kraft name. The mill is located adjacent to the Red River and Louisiana State Highway 480, approximately four and one half miles west from the center of Campti, Louisiana. The Red River Mill currently operates under Permit No. 1980-00004-02 issued November 23, 1992 and PSD-LA-562(M-1) issued March 17, 1995. Weyerhaeuser estimates that the mill can produce about 800,000 tons of linerboard annually.

The facility submitted a timely application for an initial Part 70 permit and operates pursuant to the "application shield" provided in the program.

The Red River Mill has one state permit that will remain effective until replaced by a Part 70 permit. The facility also operates under a Prevention of Significant Deterioration (PSD) permit and a Small Source Permit. This permit included the following sources:

Permit #	Units or Sources	Date Issued
1980-00004-02	01 No. 1 Kraft Recovery Furnace 02 No. 1 Dissolver Tank Vent 03 Power Boiler 04 No. 2 Kraft Recovery Furnace 05 No. 2 Dissolver Tank Vent 06 Lime Kiln	November 23, 1992

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Permit #	Units or Sources	Date Issued
1980-00004-02	07 No. 1 Hogged Fuel Boiler 08 Tall Oil Reactor 09 Digester System/Blow Tank 10 Multi-Effect Evaporators 11 Turpentine Condenser 12 No. 3 Recovery Furnace 13 No. 3 Smelt Tank 14 No. 2 Hogged Fuel Boiler 15 No. 2 Lime Kiln 16 Gas Fired Boiler	
PSD-LA-562 (M-1)	14 No. 2 Hogged Fuel Boiler	March 17, 1995
2650	1109 Black Liquid Storage Tank	December 3, 1999

An application for an initial Part 70 permit addressing the facility is still under review by the department. A Prevention of Significant Deterioration (PSD) permit has been drafted to the expansion project. The Part 70 permit for the Red River Mill has been drafted to cover two different phases of operations at the mill. Phase I describes current mill operations and emission levels. Phase II represents the modified mill and emission levels after the expansion. Sources which exist in both phases are marked with the notation 'All Phases.' This application included the following sources:

Permit #	Units or Sources	
1980-00004-VO	ARE 4	13 Brownstock Washers – A & B Lines (Phase I)
	ARE 5	15 Wastewater Treatment Effluent System (All Phases)
	ARE 6	26 Recycle Area (All Phases)
	ARE 7	27 Plant Roads (All Phases)
	EQT 3	01 Recovery Boiler No. 1 (Phase I)
	EQT 4	02 Smelt Dissolving Tank No. 1 (Phase I)
	EQT 5	03 Power Boiler (All Phases)
	EQT 6	04 Recovery Boiler No. 2 (Phase I)
	EQT 7	05 Smelt Dissolving Tank No. 2 (Phase I)
	EQT 8	06 Lime Kiln (Phase I); Backup Lime Kiln (Phase II)
	EQT 9	07 Hogged Fuel Boiler No. 1 (All Phases)
	EQT 10	08 Tall Oil Plant (All Phases)
	EQT 11	09 Hogged Fuel Boiler No. 2 (All Phases)
	EQT 12	10 Old Digester System (Phase I)
	EQT 14	11 New Digester System (Phase I); Hardwood Digester System (Phase II)
	EQT 46	16 Gasoline Storage Tank (All Phases)
	EQT 48	23 Slaker System (Phase I)
	EQT 49	40 Coke Storage Silo (All Phases)
	EQT 118	25 Propane Storage Tanks (All Phases)
	EQT 120	41 Recovery Boiler No. 3 & Smelt Tank No. 3 (Phase II)
	EQT 121	42 Lime Kiln No. 2 (Phase II)
	EQT 122	43 Slaker/Causticizer System (Phase II)
	EQT 123	46 Softwood Pulping System (Phase II)
	FUG 1	44 Chip Unloading (Phase II)
	FUG 2	46 Chip Handling (Phase II)

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Permit #	Units or Sources	
1980-00004-VO	GRP 3	12 Unwashed Brownstock Handling System
	EQT 18	111 - Pine Refined Stock Tank (Phase I)
	EQT 22	112 - #1 Pine Primary Screen Reject Tank (Phase I)
	EQT 25	115 - HDW Screened Stock Tank (All Phases)
	EQT 26	116 - HDW Liquor Filter (All Phases)
	EQT 27	119 - Liquor Salvage Tank (All Phases)
	EQT 33	123a - A Line Filtrate Tank (Phase I)
	EQT 34	123b - A Line Filtrate Tank (Phase I)
	EQT 35	123c - A Line Filtrate Tank (Phase I)
	EQT 36	124a - B Line Filtrate Tank (Phase I)
	EQT 37	124b - B Line Filtrate Tank (Phase I)
	EQT 38	124c - B Line Filtrate Tank (Phase I)
	EQT 41	130 - Primary Rejects Tank (All Phases)
	EQT 47	202 - Weak Liquor Storage Tank (Phase I)
	GRP 4	14 Brownstock Washer – C Line (All Phases)
	EQT 23	113 - HDW Clean Filtrate Tank (All Phases)
	EQT 24	114 - HDW Dirty Filtrate Tank (All Phases)
	GRP 5	17 Paper Machines (All Phases)
	EQT 50	801a - Dryer Exhaust Hood 1 (All Phases)
	EQT 51	801b - Dryer Exhaust Hood 2 (All Phases)
	EQT 52	801c - Dryer Exhaust Hood 3 (All Phases)
	EQT 53	801d - Dryer Exhaust Hood 4 (All Phases)
	EQT 54	801e - Dryer Exhaust Hood 5 (All Phases)
	EQT 55	801f - Dryer Exhaust Hood 6 (All Phases)
	EQT 56	801g - Dryer Exhaust Hood 7 (All Phases)
	EQT 57	802a - Wet End Exhaust Fan 1 (All Phases)
	EQT 58	802b - Wet End Exhaust Fan 2 (All Phases)
	EQT 59	802c - Wet End Exhaust Fan 3 (All Phases)
	EQT 60	802d - Wet End Exhaust Fan 4 (All Phases)
	EQT 61	802e - Wet End Exhaust Fan 5 (All Phases)
	EQT 62	802f - Wet End Exhaust Fan 6 (All Phases)
	EQT 63	802g - Wet End Exhaust Fan 7 (All Phases)
	EQT 64	803 - Dry End Exhaust Fan (All Phases)
	EQT 65	805 - Pick-up Roll Vac. Pump Exhaust (All Phases)
	EQT 66	806 - Flat, 1st Press Suct, Couch Vacs (All Phases)
	EQT 67	807 – 1st Press Top Uhle Box Vac. Exhaust (All Phases)
	EQT 68	808 - 2nd Press Top Uhle Box Vac. Exhaust (All Phases)
	EQT 69	809a - Isoflow Blower (All Phases)
	EQT 70	809b - Slice Vac. Pump Vacufoil (All Phases)
	EQT 71	809c - Vacfoil Blower (All Phases)
	EQT 72	811 - Belbond Vac. Pump (All Phases)
	EQT 74	829 - Fordrinier Exhaust Fan (All Phases)
	EQT 75	831 - Flat Box #3 Vac. Pump (All Phases)
	EQT 76	832 - Dry End Pulper (Phase I)
	EQT 77	835 - 1st and 2nd Botton Uhle Box Vac. (All Phases)
	EQT 88	918 - Second Section Vacuum Roll Exhaust (All Phases)
	EQT 89	919 - GH Forming Section Exhaust Fan (All Phases)
	EQT 90	925a - Dryer Exhaust Hood 1 (All Phases)
	EQT 91	925b - Dryer Exhaust Hood 2 (All Phases)
	EQT 92	925c - Dryer Exhaust Hood 3 (All Phases)

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Permit #	Units or Sources	
1980-00004-VO	EQT 93	925d - Dryer Exhaust Hood 4 (All Phases)
	EQT 94	926 - Vac. Box Vac. Pump (All Phases)
	EQT 95	927 - Forming Shoe Vac. Pump (All Phases)
	EQT 96	932 - Dry End Pulper Exhaust (All Phases)
	EQT 97	933a - Vac. Pump #1 (All Phases)
	EQT 98	933b - Vac. Pump #2 (All Phases)
	EQT 99	934a - Vac. Pump #3 (All Phases)
	EQT 100	934b - Vac. Pump #4 (All Phases)
	EQT 101	935a - Vac. Pump #5 (All Phases)
	EQT 102	935b - Vac. Pump #6 (All Phases)
	EQT 103	935c - Vac. Pump #7 (All Phases)
	EQT 104	935d - Vac. Pump #8 (All Phases)
	EQT 105	936 - 1st Press Vac. Roll Exhaust (All Phases)
	EQT 106	937a - False Ceiling Fan 1 (All Phases)
	EQT 107	937b - False Ceiling Fan 2 (All Phases)
	EQT 108	937c - False Ceiling Fan 3 (All Phases)
	EQT 109	937d - False Ceiling Fan 4 (All Phases)
	EQT 110	939a - Roof Exhaust Fan 1 (All Phases)
	EQT 111	939b - Roof Exhaust Fan 2 (All Phases)
	EQT 112	939c - Roof Exhaust Fan 3 (All Phases)
	EQT 113	939d - Roof Exhaust Fan 4 (All Phases)
	EQT 114	940 - Top Slice Blower (All Phases)
	EQT 115	942 - SP Former (All Phases)
	EQT 116	943 - Wire Clean Box Vac. (All Phases)
	GRP 6	18 Old Stock Prep Storage Tanks (Phase I); Pulp Storage Tanks (Phase II)
	EQT 42	1301a - #1 Pine HD Storage Tank (Phase I)
	EQT 43	1301b - #2 Pine HD Storage Tank (Phase I)
	EQT 124	1301 – Softwood HD Storage Tank (Phase 2)
	EQT 44	1302 – Hardwood HD Storage Tank (Phase 2)
	GRP 7	19 New Stock Prep Storage Tanks (All Phases)
	EQT 44	1302 - HDW HD Storage Tank (Phase I)
	EQT 45	1310 - HDW Surge Tank (All Phases)
	EQT 73	816 - White Water Storage Tank (All Phases)
	EQT 79	909 - Mixed Sec. Fiber Surge Tank (All Phases)
	EQT 80	910 - Long Sec. Fiber Surge Chest (All Phases)
	EQT 81	911 - Top Machine Chest (All Phases)
	EQT 82	912 - Filler Machine (All Phases)
	EQT 83	913 - Botton Machine Chest (All Phases)
	EQT 84	914 - W.W. Chest #2 (All Phases)
	EQT 85	915 - Brike Chest (All Phases)
	EQT 86	916 – Saveall (All Phases)
	EQT 87	917 - Saveall White Water Chest (All Phases)
	GRP 8	21 Evaporator Area Tanks (All Phases)
	EQT 13	1018 - 50% Black Liquor Tank (All Phases)
	EQT 15	1103 - Multi-purpose Tank (All Phases)
	EQT 125	1104 - Combined Condensate Tank (All Phases)
	EQT 17	1106 - Boilout Tank (All Phases)
	EQT 19	1111 - Weak Liquor Storage Tank (All Phases)
	EQT 20	1112a - Strong Black Liquor Tank #1 (All Phases)
	EQT 21	1112b - Strong Black Liquor Tank #2 (All Phases)

Permit #	Units or Sources	
1940-00004-V0	GRP 9	22 Causticizing Tanks (All Phases)
	EQT 28	1210a - Green Liquor Clarifier Tanks (All Phases)
	EQT 29	1212a - Causticizing Tanks (All Phases)
	EQT 30	1213a - Causticizing Stand Pipes (All Phases)
	EQT 31	1214a - White Liquor Clarifier Tanks (All Phases)
	EQT 32	1215 - Dregs Washer (All Phases)
	GRP 10	24 Tall Oil Area Storage Tanks (All Phases)
	EQT 39	1253 - Neutralized Brine Storage Tank (All Phases)
	EQT 40	1256 - Brine Mix Tank (All Phases)
	GRP 12	LK-CAP Lime Kiln Usage (Phase II)
PSD-LA-562(M-2)	ARE 5	15 Wastewater Treatment Effluent System (All Phases)
	EQT 10	08 Tall Oil Plant (All Phases)
	EQT 11	09 Hogged Fuel Boiler No. 2 (All Phases)
	EQT 49	40 Coke Storage Silo (All Phases)
	EQT 120	41 Recovery Boiler No. 3 & Smelt Tank No. 3 (Phase II)
	EQT 121	42 Lime Kiln No. 2 (Phase II)
	EQT 122	43 Slaker/Causticizer System (Phase II)
	EQT 123	46 Softwood Pulping System (Phase II)
	FUG 1	44 Chip Unloading (Phase II)
	FUG 2	46 Chip Handling (Phase II)
	GRP 5	17 Paper Machines (All Phases)
	GRP 6	18 Pulp Storage Tanks (Phase II)
	EQT 124	1301 – Softwood HD Storage Tank (Phase II)
	GRP 7	19 New Stock Prep Storage Tanks (All Phases)
	GRP 8	21 Evaporator Area Tanks (All Phases)
	GRP 9	22 Causticizing Tanks (All Phases)
	GRP 10	24 Tall Oil Area Storage Tanks (All Phases)
	GRP 12	LK-CAP Lime Kiln Usage (Phase II)

III. PROPOSED PERMIT / PROJECT INFORMATION:

Proposed Permit

A permit application and Emission Inventory Questionnaire were submitted by Willamette Industries, Inc. on October 14, 1996 requesting a Part 70 operating permit. On June 30, 2002, Willamette Industries, Inc. was merged into Weyerhaeuser Company. Additional information dated April 5, 2004, January 31, February 22, July 8, August 16, October 19, 2005, February 3, February 17, and February 24, 2006, was also received.

Project Description

The current annual production at the Red River Mill is approximately 1 million machine-dried tons of Kraft linerboard per day from both virgin pulp and recycled material (secondary fiber) pulp. Wood chips for the production of virgin pulp are delivered to the

mill via truck or from the on-site wood chipping operation, where softwood and hardwood chips are processed from logs.

The mill in its current configuration is capable of producing up to 200 oven-dried tons of pulp per day (ODTP) of unbleached hardwood pulp and approximately 1,400 ODTP of unbleached softwood pulp per day through six batch digesters, two of which are dedicated primarily to hardwood pulping. These digesters cook the chips under elevated temperature and pressure in an alkaline solution of sodium sulfide and sodium hydroxide, referred to as "white liquor". During the cooking cycle, air trapped with the chips and gases formed during cooking are relieved intermittently. A turpentine condenser is used to recover marketable turpentine from these relief gases. Upon completion of the cooking cycle, the contents of the digester (consisting of the pulp and spent cooking liquor, or "black liquor") are transferred to a blow tank, where the temperature and pressure return to atmospheric levels. The gases leaving the blow tank pass through a blow heat accumulator tank to condense the moisture, and the remaining uncondensed gases, referred to as non-condensable gases (NCGs), are incinerated in the recovery boilers or in the lime kiln. The balance of the pulp supply is produced from secondary fiber. Softwood pulp is washed in the A and B Brownstock Washer lines at the mill, while hardwood pulp is washed in the C Line Washer system, which is dedicated to hardwood pulp processing.

A multiple effect evaporator line concentrates the weak black liquor from the pulp washing process via non-contact evaporation and concentration up to a black liquor solids (BLS) content of approximately 75 %. Tall oil soap is a byproduct of the process due to pulping of softwood chips with the alkaline process, and is skimmed from the evaporators. The soap is acidified with sulfuric acid to liberate the resin acids from their sodium salts in a batch tall oil reactor at the mill.

Two existing Recovery Boilers (No. 1 and No. 2), along with accompanying smelt dissolving tanks, have the capability to combust approximately 1.75 million pounds of Black Liquor Solids (BLS)/day each. The Recovery Boilers also serve to supplement the steam requirements of the mill, and control non-condensable gases (NCGs) from the digesters, evaporator system, and condensate stripper. These NCGs consist of low volume high concentration gases (LVHCs) from pulping operations and evaporators, super-concentrator non-condensable gases (SCNCGs) from the evaporator system superconcentrator system and stripper off-gases (SOGs) from a condensate stripper used to treat pulping condensates. The Lime Kiln and Causticizing area have the capacity to produce approximately 250 tons/day CaO. The Lime Kiln is fired by both natural gas and petroleum coke, and serves as a backup control device for NCG's should the Recovery Boilers have an operational problem or shutdown.

Steam for the mill is also provided via waste-wood and natural gas-fired steam generating units (boilers). The No. 2 Hogged Fuel Boiler, with a heat input rating of 940 mmBTU/hr, combusts hogged fuel, natural gas (less than 10 % heat capacity), recycled fiber rejects, and pulp mill sludge to serve as one of the primary steam generating units for the mill. This unit was constructed in 1992, and represents a source that was permitted under the PSD regulations. The No. 1 Hogged Fuel Boiler serves as a backup to the No. 2 Hogged Fuel Boiler, with permit limitations that prohibit operation when No. 2 Hogged Fuel Boiler is operating and restrict annual operation to a maximum of 21 days per year. The mill also has a natural gas-fired power boiler rated at 181 mmBTU/hr heat input to supplement the mill steam requirements.

Kraft linerboard is produced from virgin pulp and repulped recycled secondary fiber in two paper machines at the mill. Paper Machine No. 1 was constructed in 1974, with Paper Machine No. 2 added in 1995. The paper machines have a current combined capacity to produce approximately 1,331,135 machine-dried tons of unbleached Kraft linerboard per year.

Foul condensates from the pulping operations are steam stripped and combined with other "contaminated" condensates that are lower in methanol content, which is then used in the pulp washing process with clean shower water (the Clean Condensate Alternative Approach). The excess contaminated condensates along with other process liquid waste streams are sent to a wastewater treatment plant to treat the mill's effluent before discharge into the Red River. The treatment plant consists of a primary clarifier, polymer tanks, settling ponds, sludge ponds, and aeration basins. Stripper off-gases (SOG's) are collected and incinerated in the recovery boilers at the mill.

Weyerhaeuser Company proposes to expand and modernize the Red River Mill by installing a new Recovery Boiler, Lime Kiln, Softwood Pulp Mill, and Steam Turbine. The new No. 3 Recovery Boiler will replace the existing No. 1 and No. 2 Recovery Boilers and Smelt Dissolving Tanks. The new Smelt Tank will exhaust into the Electrostatic Precipitator (ESP) on the No. 3 Recovery Boiler, and therefore will not be considered an emission point for the expansion. The new Lime Kiln and associated causticizing equipment will replace the existing Lime Kiln at the plant, with the existing kiln only used as a backup when the new kiln is not operational. The new kiln will be controlled by an ESP and Flue Gas Desulfurization (FGD).

A new softwood pulp mill will replace the existing softwood pulping operations at the facility with the addition of a new continuous digester with integrated diffusion washers, and a new softwood high-density pulp storage tank, and a new multiple effect evaporator system. Weyerhaeuser will control emissions from the new softwood high-density pulp storage tank by collecting the off gases and burning them in either the No. 2 Hogged Fuel

Boiler or the Recovery Boiler No. 3. A new softwood chip stacker/reclaimer system will also be constructed to handle the increase in softwood chip usage.

Finally, a new Steam Turbine will be installed to utilize steam produced by the No. 2 Hogged Fuel Boiler to produce electricity. The steam from the No. 2 Hogged Fuel Boiler will be supplied at 1250 psig, which requires modification of the boiler to accommodate the steam demands. As part of the No. 2 Hogged Fuel Boiler modifications, Weyerhaeuser will install and operate a Selective Non-Catalytic Reduction (SNCR) system for control of NO_X emissions.

The existing hardwood operations at the mill, including chip handling system, batch digesters, and associated equipment, will not be modified or affected by the addition of the new facilities.

This Part 70 permit for the Red River Mill has been drafted to cover two different phases of operations at the mill. Phase I describes current mill operations and emission levels. Phase II represents the modified mill and emission levels after the expansion. Regulations cited in the Specific Requirements portion of this permit for each source include text indicating which phase is applicable. Many sources and citations are applicable for both Phase I and Phase II. In this case, a source includes the text 'All Phases'. Citations which are applicable to both Phase I and Phase II do not include the phase notation with the citation.
This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP).

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

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Permitted Air Emissions

Estimated changes in permitted emissions in tons per year are as follows:

Pollutant	Phase I	Phase II	Change
PM_{10}	479.77	358.88	- 120.89
SO_2	107.77	523.22	+ 415.45
NO_X	1,924.53	2,063.55	+ 139.02
CO	2,215.85	1,715.68	- 500.17
VOC *	1,205.68	659.33	- 546.35
Total Reduced Sulfur	13.30	45.68	+ 32.38

* VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Phase I	Phase II	Change
1,1,2-Trichloroethane	0.28	0.38	+ 0.10
1,2,4-Trichlorobenzene	1.72	1.68	- 0.04
1,2-Dichloroethane	0.104	0.077	- 0.027
Acetaldehyde	22.34	27.10	+ 4.76
Acetophenone	0.24	0.02	- 0.22
Acrolein	0.772	1.161	+ 0.389
Benzene	0.50	0.69	+ 0.19
Carbon Disulfide	0.59	0.65	+ 0.06
Carbon Tetrachloride	0.45	0.35	- 0.10
Chlorobenzene	0.027	0.023	- 0.004
Chloroform	0.59	0.67	+ 0.08
Chlorinated dibenzo-p-dioxins	-	0.00000105	+ 0.00000105
Chlorinated dibenzo furans	-	0.00000032	+ 0.00000032
Cresol	2.81	0.00	- 2.81
Cumene	0.29	0.44	+ 0.15
Di-n-butyl Phthalate	0.22	0.14	- 0.08
Ethyl Benzene	0.36	0.02	- 0.34
Formaldehyde	10.89	13.41	+ 2.52
n-Hexane	0.65	0.81	+ 0.16
Methanol	434.96	352.42	- 82.54
Methyl Bromide	0.03	0.04	+ 0.01
Methyl Chloride	2.34	3.66	+ 1.32
Methyl Ethyl Ketone	8.56	9.78	+ 1.22
Methyl Isobutyl Ketone	1.07	1.06	- 0.01
Naphthalene	1.44	2.06	+ 0.62
Phenol	0.90	0.99	+ 0.09
Polynuclear Aromatic HC	1.091	1.434	+ 0.343
Propionaldehyde	0.18	0.01	- 0.17
Styrene	0.96	1.21	+ 0.25
Toluene	0.35	0.39	+ 0.04
Trichloroethylene	0.14	0.10	- 0.04
Vinyl Acetate	0.01	0.0	- 0.01
Xylene	0.88	0.74	- 0.14
Total:	495.74	421.52	- 74.21

* Other VOC (TPY): 237.81

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Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Phase I	Phase II	Change
1,1,1-Trichloroethane	0.11	0.09	- 0.02
Ammonia	45.57	89.31	+ 43.74
Antimony (& compounds)	0.012	0.022	+ 0.01
Arsenic (& compounds)	0.004	0.006	+ 0.002
Barium (& compounds)	0.034	0.047	+ 0.013
Beryllium (Table 51.1)	0.002	0.002	-
Cadmium (& compounds)	0.006	0.009	+ 0.003
Chromium VI (& compounds)	0.017	0.024	+ 0.007
Cobalt	< 0.01	< 0.01	-
Copper (& compounds)	0.032	0.045	+ 0.013
Dichloromethane	4.29	4.48	+ 0.19
Hydrochloric Acid	20.34	36.46	+ 16.12
Hydrogen Sulfide	9.74	43.02	+ 33.28
Lead	0.044	0.079	+ 0.035
Manganese (& compounds)	0.344	0.387	+ 0.043
Mercury (& compounds)	0.001	0.002	+ 0.001
Nickel (& compounds)	0.037	0.058	+ 0.021
Phosphorus	0.39	0.80	+ 0.41
Selenium (& compounds)	0.002	0.003	+ 0.001
Sulfuric Acid	13.25	0.27	- 12.98
Tetrachlorethylene	1.68	1.78	+ 0.10
Zinc (& compounds)	0.35	0.52	+ 0.17
Total:	96.25	177.41	+ 81.16

Prevention of Significant Deterioration Applicability

Weyerhaeuser Co. proposes a major modification at the Red River Mill which will trigger Prevention of Significant Deterioration analysis. The Red River Mill currently operates using the limits determined as BACT in PSD-LA-562(M-1). After the expansion project is complete, the permittee will operate under the new limits in PSD-LA-562(M-2). Permit No. PSD-LA-562(M-2) details the project and also presents a BACT analysis and an analysis of the source's impact on total air quality to ensure compliance with the National Ambient Air Quality Standards (NAAQS) and Ambient Air Standards for the affected equipment.

Estimated emissions in tons per year associated with the project are as follows:

Pollutant	Actual Emissions *	Potential Emissions	Change	PSD De Minimus
PM_{10}	141.44	323.18	+ 181.74	15
SO_2	95.23	522.23	+ 427.0	40
NO_X	778.49	1,800.07	+ 1,021.58	40
CO	1,907.52	1,618.67	- 288.85	100
VOC	531.96	625.76	+ 93.80	40
Total Reduced Sulfur (TRS)	9.97	45.83	+ 35.86	10
Sulfuric Acid	0.13	0.27	+ 0.14	7

* Actual emissions are the average of 2003 and 2004 emissions of the effected units.

The modifications associated with the project result in a significant net emissions increase of the following pollutant(s): particulate matter (PM/PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NO_X), volatile organic compounds (VOC), and total reduced sulfur (TRS). Therefore, PSD requirements, including best available control technology (BACT), apply. The selection of BACT was based on a "top down" approach; a more thorough discussion of the BACT selection process can be found in proposed permit PSD-LA-562(M-2).

Neither the project nor the general commercial, residential, industrial, or other growth associated with it is expected to have a significant adverse impact on soil, vegetation, visibility, or air quality in the area of the facility or any Class I area.

The following table displays BACT limits for applicable sources to the Red River Mill expansion project.

MAXIMUM ALLOWABLE OPERATING AND EMISSIONS RATES				
ID/Emission Point No.	**Description**	**Max Operating Rate or Capacity**	**BACT Limits**	
EQT 11 9	No. 2 Hogged Fuel Boiler	940 MM BTU/hr	PM_{10} SO_2 NO_X VOC	0.025 lb/MM BTU 0.015 lb/MM BTU 0.15 lb/MM BTU 0.01 lb/MM BTU
EQT 43 1301c	New Softwood HD Tank	800 tons	VOC	0.144 lb/ODTP
EQT 120 41	Recovery Boiler No. 3 & Smelt Tank No. 3	6.4 MM lbs BLS/day	PM_{10} SO_2 NO_X TRS VOC	0.015 gr/dscf 20 ppm 80 ppm 3 ppm 10 ppm
EQT 121 42	Lime Kiln No. 2	191,625 tons per year	PM_{10} SO_2 NO_X TRS VOC	0.01 gr/dscf 70 ppm 190 ppm 8 ppm 50 ppm
EQT 122 43	Slaker System	191,625 tons per year	PM_{10} VOC	0.03 lb/ton CaO 0.0411 lb/ton CaO
FUG 001 44	Chip Unloading	3.53 MM tons per year	PM_{10}	0.0001 lb/ton chips
FUG 002 45	Chip Handling	3.53 MM tons per year	PM_{10}	0.0000293 lb/ton chips

BACT limits at the Red River Mill determined in PSD-LA-562(M-1)				
ID/Emission Point No.	**Description**	**Max Operating Rate or Capacity**	**BACT Limits**	
14	No. 2 Hogged Fuel Boiler	940 MM BTU/hr	SO_2 NO_X CO VOC	14.1 lb/hr 1,253.2 lb/hr 1,253.2 lb/hr 411.7 lb/hr

MACT Requirements

Individual major TAPs emitted for Phase I are Acetaldehyde, Ammonia, Formaldehyde, Hydrochloric acid, Hydrogen Sulfide, Methanol and Sulfuric Acid. Individual major TAPs emitted for Phase II are Acetaldehyde, Ammonia, Formaldehyde, Hydrochloric acid, Hydrogen Sulfide, Methanol and Methyl Ethyl Ketone. Major sources in the pulp and papermill source category are exempt from the MACT provisions of LAC 33:III.5109.A according to LAC 33:III.5105.B.8. Weyerhaeuser Co., Red River Mill, complies with the requirements of NESHAP Subpart S and Subpart MM for MACT for the pulp and paper industry. Weyerhaeuser Co. must comply with NESHAP Subpart DDDDD at the Red River Mill by the compliance date published in the rule.

Air Modeling Analysis

In Phase I, PM_{10} emissions are compared to the National Ambient Air Quality Standards (NAAQS) for modeling. For both the 24 hour and annual averaging periods for all years modeled, the maximum impacts, as well as those within 10 % of the maximum impacts, occurred at or near the plant property boundary, well within 1 km of the plant boundary. Therefore, no additional refined modeling is necessary to assure identification of the maximum impacts. The maximum 24-hour and annual PM_{10} impacts from current potential emissions from the Red River Mill are well below the applicable NAAQS.

For the PSD expansion project, dispersion modeling indicates the impacts of PM_{10}, SO_2, NO_x, VOC, and TRS are below the National Ambient Air Quality Standards (NAAQS) and within the allowable increment consumption limits of these pollutants. Screening dispersion modeling indicates maximum ground level concentrations of PM_{10}, VOC, and TRS are below the preconstruction monitoring exemption levels and the ambient significance levels. No preconstruction monitoring, increment analysis, or refined modeling is required for PM_{10}, VOC, and TRS. SO_2 (3-hour and 24-hour) and NO_X concentrations were above significance levels and therefore required increment analysis and refined modeling.

The maximum total annual NO_X impact including background is predicted to be 35.88 ug/m^3, which is well less than the applicable NAAQS of 100 ug/m^3. The maximum 3-hour total SO_2 impact including background is predicted to be 81.99 ug/m^3, while the maximum 24-hour total SO_2 impact including background is predicted to be 30.55 ug/m^3. These values are well below the applicable NAAQS of 1300 ug/m^3 for the 3-hour SO_2 averaging period and 365 ug/m^3 for the 24-hour SO_2 averaging period. Since maximum total predicted ambient impacts of NOx and SO_2 are well below the applicable NAAQS, Weyerhaeuser's Red River Mill will not cause or contribute to a violation of the applicable NAAQS.

Louisiana Toxic Air Pollutant (LTAP) dispersion modeling is performed for the applicable LTAP compounds with emissions above the Minimum Emission Rate associated with the initial Title V emissions (Phase I) and the PSD expansion project.

In Phase I, emissions of Chromium VI and Polynuclear Aromatic Hydrocarbon (PAH) were compared to the Ambient Air Standards (AAS) for modeling. Only PAHs was predicted to have impacts exceeding 7.5 % of the applicable Chapter 51 MER. However, the results are well less than the 75 % of the threshold. Since the 7.5 % threshold was exceeded, and an Area of Inclusion (AOI) was established indicating the area in which impacts of a pollutant are greater than or equal to 7.5 % of the ambient air standard. For PAH, the AOI is a circle with a radius equal to 1.3 km. Since no other sources of PAH can be identified in the AOI for inclusion in the modeling, no additional modeling for PAH is required. Also, the impacts of Chromium VI are less than 7.5 % of the applicable ambient limit, therefore, no further modeling is required for this pollutant.

In the PSD expansion project, the screening modeling results predict the ambient concentration of 1,2-Dichloroethane, Ammonia, Antimony, Barium, Benzene, Carbon Tetrachloride, Chlorinated dibenzo-p-dioxins, Chlorinated dibenzo furans, Chlorobenzene, Chloroform, Chromium VI, Copper, Hydrochloric Acid, Hydrogen Sulfide, Manganese, Methyl Ethyl Ketone, Methylene Chloride, Naphthalene, Nickel, Phenol, Styrene, Sulfuric Acid, Tetrachloroethylene, and Zinc are below 7.5% of the Ambient Air Standard (AAS) provided in LAC 33:III.Chapter 51. Initial screening modeling results showed that modeled concentrations for Acetaldehyde, Acrolein, Formaldehyde, Methanol, and Polynuclear Aromatic Hydrocarbons, exceeded 7.5% of their respective AAS, which required that the initial refined model be developed. Refined modeling results showed that the modeled concentration of Acetaldehyde, Acrolein, Formaldehyde, Methanol, and Polynuclear Aromatic Hydrocarbons, were less than 75% of the AAS; therefore, no further modeling demonstrations are required.

Impact on air quality from the emissions of the proposed unit will be below the National Ambient Air Quality Standards (NAAQS) and the Louisiana Ambient Air Standards (AAS) beyond industrial property.

General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to Section VIII of the draft Part 70 permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to Section IX of the draft Part 70 permit.

The applicability of the appropriate regulations is straightforward and provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the draft permit, or where provided, Tables 2, 3 and 4 of the draft permit.

IV. Periodic Monitoring

Weyerhaeuser Company is required to perform visual inspection and monitoring of individual drain systems for ARE 004, 13 – Brownstock Washers (Phase I) according to 40 CFR 63.453, NESHAP - Subpart S.

Weyerhaeuser Company is required to monitor opacity using a continuous opacity monitor (COM) for EQT 003, 01 – Recovery Boiler No. 1 (Phase I), and EQT 006, 04 - Recovery Boiler No. 2 (Phase I), according to 40 CFR 63.864(d), NESHAP – Subpart MM.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 004, 02 – Smelt Dissolving Tank No. 1 (Phase I), and EQT 007, 05 - Smelt Dissolving Tank No. 2 (Phase I), according to 40 CFR 63.864(e)(10), NESHAP – Subpart MM.

A federally enforceable condition requires Weyerhaeuser to limit the combined total lime kiln operating hours in Phase II of both EQT 008, 06 – Backup Lime Kiln, and also EQT 121, 42 – Lime Kiln No. 2, to 8,760 hours per year. The combined total lime kiln operating time shall be recorded each month, as well as the total lime kiln operating time for the last twelve months. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. A total lime kiln operating time above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. A report showing the total lime kiln operating time for the preceding calendar year shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 008, 06 – Lime Kiln (Phase I), Backup Lime Kiln (Phase II), according to 40 CFR 63.864(e)(10), NESHAP – Subpart MM.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 009, 07 - Hogged Fuel Boiler No. 1 (All Phases), according to LAC 33:III.501.C.6.

A federally enforceable condition requires Weyerhaeuser to limit the operating hours of EQT 009, 07 - Hogged Fuel Boiler No. 1 (All Phases), to 504 hours per year. The boiler operating time shall be recorded each month, as well as the boiler operating time for the last twelve months. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division. A boiler operating time above the maximum listed in this specific condition for any twelve consecutive month period shall be a violation of this permit and must be reported to the Office of Environmental Compliance, Enforcement Division. A report showing the boiler operating time for the preceding calendar year shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 010, 08 – Tall Oil Reactor (All Phases), according to LAC 33:III.501.C.6.

Weyerhaeuser Company shall establish and maintain a record of natural gas usage for EQT 11, 09 - Hogged Fuel Boiler No. 2, to ensure the annual capacity factor for natural gas does not exceed 10 percent. Should natural gas usage exceed the annual capacity factor of 10 percent, the permittee shall within ninety days perform compliance testing for NO_X by a continuous monitoring system over a 30 day operating period as prescribed under 40 CFR 60.46b. Permittee shall include a summary of the natural gas usage in EQT 11, 09 - Hogged Fuel Boiler No. 2, In an annual report to the Office of Environmental Assessment, Environmental Technology Division, due by March 31 for the preceding calendar year.

Weyerhaeuser Company is required to monitor and record opacity by a continuous opacity monitor (COM) on EQT 011, 09 – Hogged Fuel Boiler No. 2 (All Phases), according to 40 CFR 60.48b(a), NSPS – Subpart Db.

Weyerhaeuser Company is required to monitor flow by a flow indicator once every 15 minutes in the bypass lines for EQT 012, 10 – Old Digester System (Phase I), according to 40 CFR 63.454(e), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the methanol outlet concentration on EQT 012, 10 – Old Digester System (Phase I), according to 40 CFR 63.453(h), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the seal or closure mechanism on the closed vent system by visual inspection on EQT 012, 10 – Old Digester System (Phase I), according to 40 CFR 63.453(k)(1)-(6), NESHAP – Subpart S.

Weyerhaeuser Company is required to perform visual inspection and monitoring of individual drain systems according to 40 CFR 63.453, NESHAP - Subpart S, for EQT 012, 10 – Old Digester System (Phase I).

Weyerhaeuser Company is required to monitor flow by a flow indicator once every 15 minutes in the bypass lines for EQT 014, 11 – New Digester System (Phase I); Hardwood Digester System (Phase II), according to 40 CFR 63.454(e), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the methanol outlet concentration on EQT 014, 11 – New Digester System (Phase I); Hardwood Digester System (Phase II), according to 40 CFR 63.453(h), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the seal or closure mechanism on the closed vent system by visual inspection on EQT 014, 11 – New Digester System (Phase I); Hardwood Digester System (Phase II), according to 40 CFR 63.453(k)(1)-(6), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 048, 23 – Slaker System (Phase I), according to LAC 33:III.501.C.6.

Weyerhaeuser Company is required to monitor the opacity by continuous opacity monitor (COM) for EQT 120, 41 – Recovery Boiler No. 3 & Smelt Tank No. 3 (Phase II), according to 40 CFR 63.864(d), NESHAP – Subpart MM.

Weyerhaeuser Company is required to monitor Total Reduced Sulfur and Oxygen by a continuous emission monitor (CEM) for EQT 120, 41 – Recovery Boiler No. 3 & Smelt Tank No. 3 (Phase II), and EQT 121, 42 – Lime Kiln No. 2 (Phase II), according to 40 CFR 60.284(a)(2), NSPS – Subpart BB.

Weyerhaeuser Company is required to monitor the opacity by continuous opacity monitor (COM) for EQT 121, 42 – Lime Kiln No. 2 (Phase II), according to 40 CFR 63.864(d), NESHAP – Subpart MM.

Weyerhaeuser Company is required to monitor and record the pressure drop and the liquid flow rate using a wet scrubber on EQT 122, 43 – Slaker System (Phase II), according to LAC 33:III.501.C.6.

Weyerhaeuser Company is required to monitor flow by a flow indicator once every 15 minutes in the bypass lines for EQT 123, 46 – Softwood Pulping System (Phase II), according to 40 CFR 63.454(e), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the methanol outlet concentration for EQT 123, 46 – Softwood Pulping System (Phase II), according to 40 CFR 63.453(h), NESHAP – Subpart S.

Weyerhaeuser Company is required to monitor the seal or closure mechanism on the closed vent system by visual inspection for EQT 123, 46 – Softwood Pulping System (Phase II), according to 40 CFR 63.453(k)(1)-(6), NESHAP – Subpart S.

Weyerhaeuser Company is required to properly install, operate, and maintain a fabric filter on EQT 049, 40 – Coke Storage Silo (All Phases). Filter vents shall be inspected for visible emissions on a daily basis. The filter elements (bags) shall be inspected every six months or whenever visual checks indicate maintenance may be necessary. Records of visual checks and maintenance inspections of the dust filters shall be kept on site and available for inspection by the Office of Environmental Compliance, Enforcement Division.

Weyerhaeuser Company is required to perform visual inspection and monitoring of individual drain systems according to 40 CFR 63.453, NESHAP - Subpart S, for GRP 003, 12 – Unwashed Brownstock Handling System (All Phases), and GRP 004, 14 – Brownstock Washer – C Line (All Phases).

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP 11	Odorous Substances [LAC 33:III.2901.E.7]	EXEMPT. Emission points regulated under the Total Reduced Sulfur (TRS) emission standard (LAC 33:III.2301.D.3) are exempt from the provisions of this regulation.
	Chemical Accident Provision [LAC 33:III.Chapter 59]	EXEMPT. The mill does not produce, handle, process, or store substances listed in LAC 33:III.Chapter 59 in quantities greater than the listed threshold.
	Compliance Assurance Monitoring [40 CFR 64]	EXEMPT. Permittee is exempt from CAM requirements for the initial Part 70 permit because an application had been filed and determined to be complete prior to April 20, 1998.
	Chemical Accident Prevention Provisions [40 CFR 68]	EXEMPT. The mill does not produce, handle, process, or store substances listed in 40 CFR 68.130 in quantities greater than the listed threshold.
ARE 4	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
ARE 5	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
ARE 6	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstrution, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 3	Control of Emission of Smoke LAC 33:III.1101.B]	DOES NOT APPLY. A specific opacity limit for recovery boilers is given in LAC 33:III.2301.D.4 for the Woodpulping industry.
	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 4	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 5	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. No construction or modification of this source after June 9, 1989.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 6	Control of Emission of Smoke LAC 33:III.1101.B]	DOES NOT APPLY. A specific opacity limit for recovery boilers is given in LAC 33:III.2301.D.4 for the Woodpulping industry.
	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS Subpart BB – *Standards of Performance for Kraft Pulp Mills* [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 7	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 8	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	NSPS Subpart BB – *Standards of Performance for Kraft Pulp Mills* [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 9	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3.a]	EXEMPT. Emissions from the combustion of Group I virgin fossil fuels (natural gas) are exempt from the requirements of this Subchapter.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 9 Cont.	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.7]	EXEMPT. Emissions from the combustion of wood residue fuel are exempt from the provisions of LAC 33:III.5109.
	NSPS Subpart D – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40(a)(2)]	EXEMPT. By letter dated February 9, 2004, the Louisiana Department of Environmental Quality determined that the boiler's maximum hourly natural gas heat input capability is lower than the NSPS Subpart D threshold.
	NSPS Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. No construction or modification of this source after June 19, 1984.
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	DOES NOT APPLY. The boiler has a maximum design heat input capacity greater than 100 MM BTU/hr.
EQT 10	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
EQT 11	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. BACT limit for SO_2 is more stringent.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3.a]	EXEMPT. Emissions from the combustion of Group I virgin fossil fuels (natural gas) are exempt from the requirements of this Subchapter.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.7]	EXEMPT. Emissions from the combustion of wood residue fuel are exempt from the provisions of LAC 33:III.5109.
	NSPS Subpart D – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40(a)(2)]	DOES NOT APPLY. Boiler meets the requirements of 40 CFR 60.40b(a) and is not subject to the requirements NSPS Subpart D according to 40 CFR 60.40b(j).
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	DOES NOT APPLY. The boiler has a maximum design heat input capacity greater than 100 MM BTU/hr.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 12	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.3.b]	APPLIES. The TRS standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart S for non-condensable gases.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. No construction or modification of this source after September 24, 1976.
EQT 14	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.3.b]	APPLIES. The TRS standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart S for non-condensable gases.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.283(a)(1)]	APPLIES. The TRS standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart S for non-condensable gases.
EQT 46	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b(a)]	EXEMPT. The capacity of the gasoline storage tank is less than 10,566 gallons.
EQT 48	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
EQT 49	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 118	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b(a)]	EXEMPT. The capacity of the propane storage tanks is less than 10,566 gallons.
EQT 120	Control of Emission of Smoke LAC 33:III.1101.B]	DOES NOT APPLY. A specific opacity limit for recovery boilers is given in LAC 33:III.2301.D.4 for the Woodpulping industry.
	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.1.a & 2301.D.4]	APPLIES. The Particulate Matter and Opacity standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart MM.
	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.3.a.i]	APPLIES. The TRS standards comply by meeting the more stringent requirements of NSPS – Subpart BB.
	NSPS – Subpart BB Standards of Performance for Kraft Pulp Mills [40 CFR 60.282(a)(1)(i) & 282(a)(1)(ii)]	APPLIES. The Particulate Matter and Opacity standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart MM.
EQT 121	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits less than 250 tons of SO2 per year is exempt from the 2,000 ppmv limitation but permittee must maintain records to verify exemption from LAC 33:III.1503.C.
	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.1.a]	APPLIES. The Particulate Matter standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart MM.
	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.3.a.i]	APPLIES. The TRS standards comply by meeting the more stringent requirements of NSPS – Subpart BB.
	NSPS – Subpart BB Standards of Performance for Kraft Pulp Mills [40 CFR 60.283.(a)(5)]	APPLIES. The Particulate Matter standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart MM.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 122	Emission Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. This Section does not apply to the wood pulping industry.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
EQT 123	Control of Emissions from the Chemical Woodpulping Industry [LAC 33:III.2301.D.3.b]	APPLIES. The TRS standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart S for non-condensable gases.
	NSPS – Subpart BB Standards of Performance for Kraft Pulp Mills [40 CFR 60.283(a)(1)]	APPLIES. The TRS standards comply by meeting the more stringent MACT requirements of NESHAP – Subpart S for non-condensable gases.
GRP 3, EQT 18, EQT 22, EQT 25, EQT 26, EQT 27, EQT 33, EQT 34, EQT 35, EQT 36, EQT 37, EQT 38, EQT 41, EQT 47	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstrution, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP 4, EQT 23, EQT 24 Cont.	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstrution, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.283(a)(1)(iv)]	EXEMPT. By letter dated June 20, 2003, EPA Region 6 has determined that the C-Line Brown Stock Washer System qualifies for an exemption from the TRS emission standard because the cost of controlling emissions would be economically unfeasible.
GRP 5, EQT 79	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP 6, EQT 42, EQT 43	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [*40 CFR 60.110b*	EXEMPT. *In the final rule for NSPS Subpart Kb dated October 15,* 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.
GRP 7, EQT 44, EQT 45, EQT 73, EQT 79	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.
GRP 8, EQT 13, EQT 15, EQT 125, EQT 17, EQT 19, EQT 20, EQT 21	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.

V. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
GRP 8, EQT 13, EQT 15, EQT 125, EQT 17, EQT 19, EQT 20, EQT 21 Cont.	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.
GRP 9, EQT 28, EQT 29, EQT 31	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.
GRP 10, EQT 39, EQT 40	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Tanks do not store a volatile organic compound with a vapor pressure of 1.5 psia or greater.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.8]	EXEMPT. Major sources in the pulp and paper industry are exempt from the MACT provisions of LAC 33:III. Chapter 51.
	NSPS – Subpart Kb Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. [40 CFR 60.110b]	EXEMPT. In the final rule for NSPS Subpart Kb dated October 15, 2003, EPA has exempted process tanks and eliminated recordkeeping requirements for storage vessels with a capacity less than 19,812 gallons, for storage vessels with a capacity between 19,812 and 39,889 gallons storing liquid with vapor pressure less than 2.18 psia, and for storage vessels with a capacity greater than 39,889 gallons storing liquid with vapor pressure less than 0.51 psia.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

VI. Streamlined Requirements			
Unit or Plant Site	**Programs Being Streamlined**	**Stream Applicability**	**Overall Most Stringent Program**
	Not Applicable		

VII. Glossary

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

Carbon Monoxide (CO) – A colorless, odorless gas which is an oxide of carbon.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Hydrogen Sulfide (H_2S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

New Source Review (NSR) - A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: $\geq$ 10 tons per year of any toxic air pollutant; $\geq$ 25 tons of total toxic air pollutants; and $\geq$ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

Sulfur Dioxide (SO_2) – An oxide of sulphur.

Title V permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) - Any organic compound which participates in atmospheric photochemical reactions; that is, any organic compound other than those which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.