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1/26/2021

Fed Ex No.: 8156 4079 1432

Technical Management Section
South Carolina Department of Health and
Environmental Control
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201-1708

Re: New Indy Catawba Semi-Annual Reporting; July 1, 2020 – December 31, 2020
Air Permit No. TV-2440-0005

Technical Management Section:

The purpose of this submittal is to meet the semi-annual reporting requirements for the New Indy Catawba LLC mill located at 5300 Cureton Ferry Road in Catawba, South Carolina.

Semi-annual reporting requirements in Section C of the Permit are outlined in this report, and detailed in Attachment A. Additional National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements are included in Attachment B.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Daniel Mallett at (803) 981-8010 or Dan.Mallett@new-indycb.com.

Sincerely,

Charles Cleveland
Technical Manager

Attachments: Attachment A: Excess Emissions and Continuous Emissions Monitor Report Logs
Attachment B: Additional NESHAP Requirements

cc: EPA Region 4
SCDHEC – BAQ, Air Toxics Section
Allie Dabney, Midlands EQC Lancaster
Environmental File 208.21

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TV-2440-0005, Condition C.4

Emission Unit IDs:	02, 03, 04, 06, 07, 08, 09
Equipment IDs:	5210, 5220, 5230, 5240, 5250, 5300, 5300C, 1790, 1790C, 1790Ca, 9700, B-2000, 2505, 2510, 2520, 5105, 5110, 5120, 2723, 2700 (No. 4 Causticizer), 2701, 2702, 2703, 2400, 2500, 5100, 2505C, 5105C, 2723C, 2511C, 2725C, 2726C, 2724C, 2605, 3705, 5260, 5260C, 5270, 2605C, 2610C, 3705C, 3710C1, 9800, 9801, 9802
Regulation:	S.C. Regulation 61-62.1, Section II; S.C. Regulation 61-62.70.6.a.3.i.B
Description:	Monitoring parameter readings and inspection checks are maintained in logs. Instances of operation outside operational ranges including date, time, cause and correction action taken.

See Attachment A.

TV-2440-0005, Condition C.11

Emission Unit IDs:	01
Equipment IDs:	1300
Regulation:	SC Std. 4 and SC Std. 62.6 opacity and fugitive emission limitations
Description:	Opacity limit of 20%. Visual emissions inspections of the woodyard on a semi-annual basis.

There were no instances of abnormal visual observations recorded during the reporting period.

TV-2440-0005, Condition C.13

Emission Unit IDs:	02
Equipment IDs:	5210, 5250, 2605, 3705, 5270
Regulation:	NSPS BB
Description:	Continuous monitoring from B&W No.1 Combination Boiler 1, B&W No.1 Combination Boiler 2, and the HVLC Collection System

Semi-annual compliance is summarized in the Tables 1 and 2 below. Detailed information can be found in Attachment A.

Table 1. Continuous Emissions Monitoring Summary – Combination Boiler 1 (2605)

	3rd Quarter	**4th Quarter**	**Semi-Annual Period**
Monitor Downtime (%)	0.14	0.01	0.05
Emissions Discrepancies (%)	0.00	0.07	0.05
Overall Compliance (%)	99.86	99.92	99.90

Table 2. Continuous Emissions Monitoring Summary – Combination Boiler 2 (3705)

	3rd Quarter	**4th Quarter**	**Semi-Annual Period**
Monitor Downtime	2.09	0.18	1.06
Emissions Discrepancies (%)	0.03	0.16	0.10
Overall Compliance (%)	97.88	99.66	98.84

Table 3. Continuous Emissions Monitoring Summary – HVLC Collection System (5270)

	3rd Quarter	**4th Quarter**	**Semi-Annual Period**
Monitor Downtime	N/A	N/A	N/A
Emissions Discrepancies (%)	0.20	1.11	0.49
Overall Compliance (%)	99.80	98.89	99.51

TV-2440-0005, Condition C.14

Emission Unit IDs:	02, 08
Equipment IDs:	5210, 5240, 2400, 5100, 2605, 3705, 5260, 5260C
Regulation:	SC Reg. 61-62.5 Standard No. 7 {Prevention of Significant Deterioration}
Description:	Daily Unbleached Pulp Production

The daily unbleached pulp production is limited to 1,825 air dried tons unbleached pulp (ADTUBP) per day (12-month rolling average). The rolling average pulp mill production did not exceed the limit during the reporting period.

Table 4. Pulp Mill Daily Production

Month	12-Month Rolling Average (ADTUBP/day)	Corrective Actions Taken if Exceedance Occurred
July-19	1,065	N/A
August-19	1,080	N/A
September-19	1,072	N/A
October-19	1,083	N/A
November-19	1,079	N/A
December-19	1,085	N/A
January-20	1,074	N/A
February-20	1,081	N/A
March-20	1,078	N/A
April-20	1,078	N/A
May-20	1,062	N/A
June-20	1,098	N/A
July-20	1,060	N/A
August-20	1,024	N/A
September-20	953	N/A
October-20	851	N/A
November-20	772	N/A
December-20	680	N/A

TV-2440-0005, Condition C.15

Emission Unit IDs:	03
Equipment IDs:	5300, 5300C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Bleach Plant Scrubber Opacity

See Bleach Plant Scrubber Log in Attachment A. The emissions from this source (including fugitive emissions) did not exhibit an opacity greater than 20%.

TV-2440-0005, Condition C.16

Emission Unit IDs:	04
Equipment IDs:	1790, 1790C, 1790Ca
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	ClO_2 Generator Opacity

See ClO_2 Scrubber Log in Attachment A.

TV-2440-0005, Condition C.19

Emission Unit IDs:	05
Equipment IDs:	4400
Regulation:	SC Reg. 61-62.5 Standard No. 7 {Prevention of Significant Deterioration}
Description:	Thermo-mechanical pulp production

The thermo-mechanical pulping (TMP) process is limited to 384,900 air dried tons of pulp (ADTP) per year. TMP was shut down on May 11, 2020 and did not operate during the reporting period. TMP production did not exceed 384,900 ADTP per year on a 12-month rolling sum during the reporting period.

Table 5. Thermo-Mechanical Pulp Production

Month	Monthly Sum (ADTP / month)	12-Month Rolling Sum (ADTP/yr)
July-19	4,759	105,682
August-19	7,814	101,915
September-19	5,337	95,515
October-19	8,471	93,656
November-19	4,409	89,178
December-19	7,285	85,804
January-20	7,806	83,396
February-20	7,143	83,002
March-20	8,380	82,415
April-20	7,117	80,383
May-20	1,967	75,333
June-20	0	70,486
July-20	0	65,728
August-20	0	57,914
September-20	0	57,577
October-20	0	44,106
November-20	0	39,698
December-20	0	32,413

TV-2440-0005, Condition C.23

Emission Unit IDs:	06
Equipment IDs:	4600, 4605, 4610, 4100, 4110, 2100, 9701A, 9701B, 9702, 9703, 9704, 2000, 2005, 2010
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Papermill Opacity Monitoring

Visual opacity monitoring is performed while emission units combust fuel other than propane or natural gas. If opacity deviations occur, the cause and corrective action are listed in Table 6 below. No observations of abnormal emissions occurred during the reporting period.

Table 6. Papermill Visible Emissions

ID	Source Description	Cause/Corrective Action for Abnormal Emissions
4600	No. 2 Paper Machine (PM)	N/A
4605	No. 2 Paper Machine Re-Reeler	N/A
4610	No. 2 Coater Dryer	N/A
4100	Opacity No. 3 Paper Machine	N/A
4110	No. 3 Paper Machine Air Flotation Dryer (while burning kerosene)	N/A
2100	Pulp Dryer	N/A
9701A	Slurry Tank	N/A
9701B	Slurry Tank	N/A
9702	Starch Cooker	N/A
9703	Flash Tank	N/A
9704	Paste Tank	N/A
2000	No. 1 Paper Machine	N/A
2005	No. 1 Paper Machine Re-Reeler	N/A
2010	No. 1 Coater Dryer	N/A

TV-2440-0005, Condition C.26

Emission Unit IDs:	06
Equipment IDs:	4610
Regulation:	(S.C. Regulation 61-62.1, Section II; S.C. Regulation 61-62.70.6.a.3.i.B)
Description:	No. 2 Coater Dryer Fuel Usage

The No. 2 Coater Dryer is permitted to burn only natural gas (no limit), 3,000,000-gallons of kerosene per year, and 475,000-gallons propane per year. Records of fuel consumption on a 12-month rolling sum basis are provided in Table 7. The No. 2 PM did not run during the reporting period.

Table 7. No. 2 Coater Dryer Fuel Consumption

Month	Natural Gas (scf)	Propane (gallons)	Kerosene (gallons)
July-19	0	0	0
August-19	0	0	0
September-19	0	0	0
October-19	0	0	0
November-19	0	0	0
December-19	0	0	0
January-20	0	0	0
February-20	0	0	0
March-20	0	0	0
April-20	0	0	0
May-20	0	0	0
June-20	0	0	0
July-20	0	0	0
August-20	0	0	0
September-20	0	0	0
October-20	0	0	0
November-20	0	0	0
December-20	0	0	0

TV-2440-0005, Condition C.27

Emission Unit IDs:	06
Equipment IDs:	9700, B-2000
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Starch Silo Opacity

Visual opacity monitoring is performed daily for the starch silos while unloading. No abnormal emissions were observed during the reporting period. For additional information, see Attachment A.

TV-2440-0005, Condition C.28

Emission Unit IDs:	06
Equipment IDs:	9700, B-2000
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	PM Visual Inspections

See Section TV-2440-0005, Condition C.27 of this Report.

TV-2440-0005, Condition C.29

Emission Unit IDs:	06
Equipment IDs:	4120, 4130
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Infrared Dryer and Hot Oil Heating System

No abnormal emissions from these sources occurred during the reporting period. Source ID 4120 did not operate during the reporting period and has not operated since 2013. No fuels other than natural gas or propane were combusted in Source ID 4130.

TV-2440-0005, Condition C.30

Emission Unit IDs:	06
Equipment IDs:	4120, 4130
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Infrared Dryer and Hot Oil Heating System

Source ID 4120 did not operate during the reporting period and has not operated since 2013. Source ID 4130 also did not operate during the reporting period.

Month	Natural Gas (MMBtu)	12-Month Rolling Sum
July-19	1,654	43,386
August-19	3,559	42,616
September-19	1,937	40,158
October-19	3,534	39,311
November-19	2,243	37,214
December-19	3,004	35,461
January-20	3,669	35,315
February-20	3,607	36,008
March-20	4,185	36,309
April-20	3,201	34,972
May-20	989	32,870
June-20	0	31,584
July-20	0	29,929
August-20	0	26,370
September-20	0	24,433
October-20	0	20,899
November-20	0	18,656
December-20	0	15,652

TV-2440-0005, Condition C.32

Emission Unit IDs:	06
Equipment IDs:	9900
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions from Fuel Burning Operations}
Description:	Paper Machine Air Makeup Units Fuel Usage

Fuel usage for Source 9900 is listed below in Table 8. This source is permitted to burn 631,540,000 standard cubic feet of natural gas/year (total for all units) and 1,428,571 gallons of propane per year (total for all units). This source did not operate during the reporting period.

Table 8. Air Makeup Unit Fuel Usage

Month	Natural Gas (scf)	12-Month Rolling Sum	Propane (gallons)	12-Month Rolling Sum
July-19	46	656	0	0
August-19	64	553	0	0
September-19	68	517	0	0
October-19	15	480	0	0
November-19	1	480	0	0
December-19	0	478	0	0
January-20	0	478	0	0
February-20	0	376	0	0
March-20	1	290	0	0
April-20	65	309	0	0
May-20	1	288	0	0
June-20	1	262	0	0
July-20	0	215	0	0
August-20	0	151	0	0
September-20	0	83	0	0
October-20	0	68	0	0
November-20	0	67	0	0
December-20	0	67	0	0

TV-2440-0005, Condition C.33

Emission Unit IDs:	06
Equipment IDs:	4110
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Air Flotation Dryer Fuel Usage

Fuel usage for Source 4110 is listed below in Table 9. The source did not exceed the PSD BACT limit for PM of 0.0164 pounds per million Btu during the reporting period.

Table 9. Air Flotation Dryer Fuel Usage (12-Month Rolling Sums)

Month	Natural Gas (MMBtu)	Propane (gallons)	Kerosene (gallons)
July-19	76,464	0	0
August-19	75,106	0	0
September-19	70,775	0	0
October-19	69,282	0	0
November-19	65,587	0	0
December-19	62,497	0	0
January-20	62,239	0	0
February-20	63,461	0	0
March-20	63,991	0	0
April-20	61,634	0	0
May-20	57,930	0	0
June-20	55,663	0	0
July-20	52,748	0	0
August-20	46,475	0	0
September-20	43,061	0	0
October-20	36,833	0	0
November-20	32,879	0	0
December-20	27,585	0	0

TV-2440-0005, Condition C.35

Emission Unit IDs:	06
Equipment IDs:	4610, 9900
Regulation:	SC Reg. 61-62.1, Section. II(E) {General Requirements-Synthetic Minor}
Description:	No. 2 Coater Dryer and the Paper Machine Air Make Up Units Fuel Consumption

See Sections TV-2440-0005, Condition C.26 and TV-2440-0005, Condition C.32 of this Report.

TV-2440-0005, Condition C.37

Emission Unit IDs:	07
Equipment IDs:	2515, 2520, 2700, 2702, 2703, 5115, 5120
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	Chemical Recovery Visible Emissions

Visual opacity monitoring is performed for the above listed sources at the frequency listed in Table 10. If opacity deviations occur, the cause and corrective action are also listed in Table 10 below. No abnormal emissions were observed during the reporting period.

Table 10. Chemical Recovery Visible Emissions

ID	VE Frequency	Source Description	Cause/Corrective Action for Abnormal Emissions
2515	Semi-annual	No. 2 Recovery Furnace Precipitator Mix Tank	N/A
2520	Semi-annual	Salt Cake Mix Tank	N/A
5115	Semi-annual	No. 3 Recovery Furnace Precipitator Mix Tank	N/A
5120	Semi-annual	No. 3 Salt Cake Mix Tank	N/A
2700	Semi-annual	Causticizing Equipment	N/A
2702	Daily	Purchased Lime Silo	N/A
2703	Daily	Reburned Lime Silo	N/A

TV-2440-0005, Condition C.39

Emission Unit IDs:	07
Equipment IDs:	2505, 2505C, 2723, 2723C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NESHAP, Subpart MM
Description:	No. 2 Recovery Furnace and No. 2 Lime Kiln Opacity

Information regarding the No. 2 Recovery Boiler Opacity monitor can be found in Table 11. Excess emissions and COMS downtime are summarized in Table 12. Detailed Information is provided in Attachment A.

Table 11. No. 2 Recovery Boiler Opacity Monitoring

Process Unit Description:	No. 2 Recovery Boiler
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 20, 2006 Audit: September 30, 2020
Total Source Operating Time in Reporting Period:	133,710 minutes

Table 12. No. 2 Recovery Boiler Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	**Duration (minutes)**	
	Over 35%	**Over 20% for 60 minutes**
A. Startup/Shutdown	0	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	42	276
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	18	0
Total Number of Incidents	4	2
Excess Emissions/Process Operating Time	0.05%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	**Duration (minutes)**	
Monitor Equipment Malfunctions	1590	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	0	
Other Known Cause	0	
Other Unknown Cause	6	
Total Number of Incidents	6	
Percent Monitor Downtime	1.19%	

Information regarding the No. 2 Lime Kiln Opacity monitor can be found in Table 13. Excess emissions and COMS downtime are summarized in Table 14. Detailed Information is provided in Attachment A.

Table 13. No. 2 Lime Kiln Opacity Monitoring

Process Unit Description:	No. 2 Lime Kiln
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	20%
Monitor Manufacturer(s) and Model Number(s):	Monitor Labs USI 550 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: October 27, 2012 Audit: September 15, 2020
Total Source Operating Time in Reporting Period:	94,120 Minutes

Table 14. No. 2 Lime Kiln Excess Emissions and Downtime Summary

Excess Emissions Summary		
Reason for Excess Emissions	**Duration (minutes)**	
	Over 20%	**Over 20% for 60 minutes**
A. Startup/Shutdown	246	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	0	0
Fuel Problems	0	0
Other Known Cause	0	0
Other Unknown Cause	0	0
Total Number of Incidents	18	0
Excess Emissions/Process Operating Time	0.26%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	**Duration (minutes)**	
Monitor Equipment Malfunctions	20	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	25	
Other Known Cause	0	
Other Unknown Cause	0	
Total Number of Incidents	2	
Percent Monitor Downtime	0.05%	

TV-2440-0005, Condition C.40

Emission Unit IDs:	07
Equipment IDs:	2510, 5110, 2511C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	No. 2 and No. 3 Smelt Dissolving Tank Opacity

See Attachment A.

TV-2440-0005, Condition C.41

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS, Subpart BB
Description:	No. 3 Recovery Boiler Opacity

Information regarding the No. 3 Recovery Boiler Opacity monitor can be found in Table 15. Excess emissions and COMS downtime are summarized in Table 16. Detailed Information is provided in Attachment A.

Table 15. No. 3 Recovery Boiler Opacity Monitoring

Process Unit Description:	No. 3 Recovery Boiler
Pollutant:	Opacity
Time Period:	Minutes
Emission Limits:	35%
Monitor Manufacturer(s) and Model Number(s):	Teledyne Monitor Labs / Light Hawk 560 Opacity Monitor
Last CMS Certification or Audit Date:	Certification: July 31, 2010 Audit: October 1, 2020
Total Source Operating Time in Reporting Period:	146,350 Minutes

Table 16. No. 3 Recovery Boiler Excess Emissions and Downtime Summary Opacity

Excess Emissions Summary		
Reason for Excess Emissions	**Duration (minutes)**	
	Over 35%	**Over 20% for 60 minutes**
A. Startup/Shutdown	24	0
B. Malfunctions		
Process/Instrument System	0	0
Control Equipment	30	209
Fuel Problems	0	0
Other Known Cause	6	90
Other Unknown Cause	6	0
Total Number of Incidents	7	4
Excess Emissions/Process Operating Time	0.05%	N/A
Monitor Downtime Summary		
Reason for Monitor Downtime	**Duration (minutes)**	
Monitor Equipment Malfunctions	126	
Non-Monitor Equipment Malfunctions	0	
Quality Assurance	85	
Other Known Cause	0	
Other Unknown Cause	0	
Total Number of Incidents	5	
Percent Monitor Downtime	0.14%	

TV-2440-0005, Condition C.42

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB NESHAP, Subpart MM
Description:	No. 3 Recovery Boiler Opacity

See Section TV-2440-0005, Condition C.41 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.44

Emission Unit IDs:	07
Equipment IDs:	2723, 2723C
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB
Description:	No. 2 Lime Kiln

See Section TV-2440-0005, Condition C.39 of this Report and detailed information in Attachment A. The ton per day lime production on a 12-month rolling average basis did not exceed 465.0 tons per day (see Condition C.48) during the reporting period.

TV-2440-0005, Condition C.45

Emission Unit IDs:	07
Equipment IDs:	2700, 2701, 2725C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; CAM
Description:	Slaker Scrubber Flow

See detailed information in Attachment A.

TV-2440-0005, Condition C.46

Emission Unit IDs:	07
Equipment IDs:	2702, 2703, 2726C, 2724C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; CAM
Description:	Lime Silo Opacity

Daily visual inspections are conducted for visible emissions when unloading the lime silos. No abnormal emissions were observed during the reporting period.

TV-2440-0005, Condition C.48

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor}
Description:	No. 2 Lime Kiln Production

Production from the No. 2 Lime Kiln is limited to 169,725 tons per year on a 12-month rolling sum basis. Lime Kiln production for the reporting period is shown in Table 17.

Table 17. Lime Kiln 2 Production

Month	Tons per Day	12-Month Rolling Avg (TPD)	Monthly	12-Month Rolling Sum (tons)
July-19	407	355	12,617	129,736
August-19	385	353	11,935	129,147
September-19	308	347	9,240	126,927
October-19	376	347	11,656	126,834
November-19	327	344	9,810	125,694
December-19	378	343	11,718	125,446
January-20	368	344	11,408	125,601
February-20	345	343	10,005	125,666
March-20	293	337	9,083	123,527
April-20	334	335	10,020	122,687
May-20	295	328	9,145	120,207
June-20	291	342	8,730	125,367
July-20	310	334	9,610	122,360
August-20	318	329	9,858	120,283
September-20	235	323	7,050	118,093
October-20	0	291	0	106,437
November-20	157	277	4,710	101,337
December-20	712	305	22,059	111,678

TV-2440-0005, Condition C.51

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; SC Reg. 61-62.5, Standard No. 7.1 {NSR}
Description:	Recovery Boiler 3 NOx

NOx emissions from the No. 3 Recovery Furnace are limited to 78 ppmv @8% O_2. See detailed information regarding excess emissions and monitor downtime in Attachment A.

TV-2440-0005, Condition C.52

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Lime Kiln 2 NOx

The twelve-month rolling sum is limited to less than or equal to 169,725 tons. See Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.53

Emission Unit IDs:	07, 08
Equipment IDs:	2400, 2500, 5100, 5260, 5260C, 2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS, Subpart BB
Description:	LVHC Scrubber

See detailed information in Attachment A for any variances from established parameters and appropriate corrective action taken during the reporting period.

TV-2440-0005, Condition C.54

Emission Unit IDs:	07
Equipment IDs:	2505
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	No. 2 Recovery Boiler TRS

See detailed information regarding excess emissions and monitor downtime in Attachment A for monitor maintenance and monitor downtime. There were no periods of excess emissions above the applicable standard.

TV-2440-0005, Condition C.55

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	SC Reg. 61-62.5, Standard No. 7 {PSD}; NSPS, Subpart BB
Description:	Recovery Boiler 3 TRS

No. 3 Recovery Furnace excess emissions of TRS are limited to 5 ppmv @ 8% O_2.

The Department will not consider periods of excess emissions to be indicative of a violation of 40 CFR 60, Subpart BB if the number of 12-hour exceedances from No. 3 Recovery Furnace is less than or equal to 1% of the total number of contiguous 12-hour periods in a quarter (excluding periods of startup, shutdown, or malfunction and periods when the recovery furnace is not operating). Monitor downtime and excess emissions for the reporting period were 0.40% and 0.00% of operating time, respectively.

Detailed information regarding excess emissions and monitor downtime is provided in Attachment A.

TV-2440-0005, Condition C.56

Emission Unit IDs:	07
Equipment IDs:	5105
Regulation:	NSPS, Subpart Db; SC Reg. 61-62.1, Section II(J)(2) {Special Permit Conditions}
Description:	Recovery Boiler 3 Fossil Fuel Capacity Factor

Fuel consumption from the No. 3 Recovery Furnace is included in Table 18. No variances or exceedances occurred during the reporting period.

Table 18. No. 3 Recovery Furnace Fuel Consumption

Month	12-Month Rolling Sum		
	Softwood Pulping Liquor (OD Short Tons)	Natural Gas at 68°F (SCF)	Heavy Fuel Oil (gallons)
July-19	524,697	187,262,661	759,194
August-19	526,950	186,554,785	759,194
September-19	518,758	185,808,435	759,277
October-19	519,133	182,265,384	759,277
November-19	512,430	181,443,596	712,959
December-19	516,080	160,784,691	687,945
January-20	512,762	159,161,041	679,334
February-20	517,660	162,647,468	637,438
March-20	515,589	126,792,463	698,184
April-20	513,728	96,996,157	717,143
May-20	504,826	113,348,851	744,225
June-20	542,103	85,880,732	414,956
July-20	529,919	91,131,704	439,477
August-20	514,388	103,609,858	499,565
September-20	475,804	96,675,363	592,653
October-20	426,949	100,410,419	594,762
November-20	386,572	208,061,548	632,664
December-20	339,925	285,289,081	881,732

TV-2440-0005, Condition C.57

Emission Unit IDs:	07
Equipment IDs:	2510, 5110, 2511C
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; NSPS BB; SC Reg. 61-62.5, Standard No. 7 {PSD}
Description:	Smelt Dissolving Tank Scrubber

See detailed information regarding excess emissions and monitor downtime in Attachment A. There were no excess emissions recorded during the reporting period.

TV-2440-0005, Condition C.58

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	NSPS, Subpart BB; SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor Construction Permits}
Description:	No. 2 Lime Kiln TRS

See detailed information regarding excess emissions and monitor downtime in Attachment A. See Lime Kiln Production in Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.59

Emission Unit IDs:	07
Equipment IDs:	2723
Regulation:	SC Reg. 61-62.1, Section II(E) {General Requirements-Synthetic Minor Construction Permits}
Description:	No. 2 Lime Kiln VOC and Beryllium

See Lime Kiln Production in Section TV-2440-0005, Condition C.48 of this Report.

TV-2440-0005, Condition C.61

Emission Unit IDs:	08
Equipment IDs:	2550
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Power Boiler

Visual opacity monitoring is performed daily if the Power Boiler combusts No. 6 Fuel Oil. No observations of abnormal emissions occurred during the reporting period.

TV-2440-0005, Condition C.64

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Combination Boilers 1 and 2 Opacity

See Section TV-2440-0005, Condition C.13 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.65

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 1 {Emissions From Fuel Burning Operations}
Description:	Combination Boilers 1 and 2 Opacity

See Section TV-2440-0005, Condition C.13 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.66

Emission Unit IDs:	02, 08
Equipment IDs:	5210, 5240, 2400, 5100, 2605, 3705, 5260, 5260C - affected sources and control devices for the optimization project to increase Kraft pulp yield (as permitted under construction permit-DC)
Regulation:	SC Reg. 61-62.5 Standard No. 1 {Emissions from Process Industries}; SC Reg. 61-62.5 Standard No. 7 {PSD}
Description:	TRS and SO_2 from affected sources and control devices for the optimization project to increase Kraft pulp yield

See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A.

There were no exceedances of the wood rate/Kraft pulp production ratio or the PSD BACT limit for tons of SO_2 per year.

TV-2440-0005, Condition C.68

Emission Unit IDs:	08
Equipment IDs:	2605, 3705
Regulation:	SC Reg. 61-62.5, Standard No. 3 {Waste Combustion and Reduction}
Description:	Combination Boiler Tire-Derived Fuel

Tire-Derived Fuel (TDF) monthly average hourly consumption is included in Table 19. TDF fuel usage is limited to less than or equal to 1.5 tons per hour of TDF. No exceedances occurred during the reporting period.

Table 19. Tire-Derived Fuel Consumption

Month	Short Tons TDF per hour	
	Combination Boiler 1	Combination Boiler 2
July-19	0.05	0.07
August-19	0.12	0.20
September-19	0.19	0.31
October-19	0.10	0.20
November-19	0.16	0.30
December-19	0.13	0.19
January-20	0.03	0.06
February-20	0.18	0.20
March-20	0.09	0.16
April-20	0.14	0.29
May-20	0.15	0.31
June-20	0.01	0.01
July-20	0.00	0.21
August-20	0.16	0.05
September-20	0.00	0.00
October-20	0.00	0.00
November-20	0.00	0.00
December-20	0.00	0.00

TV-2440-0005, Condition C.69

Emission Unit IDs:	08, 09
Equipment IDs:	2605, 3705, 5260, 5270, 9820, 5260C
Regulation:	NSPS BB; CAM
Description:	TRS Venting

See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.71

Emission Unit IDs:	09
Equipment IDs:	9800, 9801, 9820, 2605, 3705
Regulation:	NSPS BB; CAM
Description:	TRS Venting

See Sections TV-2440-0005, Condition C.13, C.14, C.53, C.64, and C.65 of this Report and detailed information in Attachment A.

TV-2440-0005, Condition C.74

Emission Unit IDs:	11
Equipment IDs:	2900, 1100-Roads
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}; SC Reg. 61-62.6 {Control of Fugitive Particulate Matter}
Description:	Landfill and Road Visible Emissions

Visual inspections are performed on a semi-annual basis during source operation. No abnormal emissions occurred during the reporting period.

TV-2440-0005, Condition C.75

Emission Unit IDs:	12
Equipment IDs:	1299 – HD Pulp Storage Tanks
Regulation:	SC Reg. 61-62.5, Standard No. 4 {Emissions from Process Industries}
Description:	HD Pulp Storage Tanks Visible Emissions

Visual inspections are performed on a semi-annual basis during source operation. No abnormal emissions occurred during the reporting period.

Attachment A

Excess Emissions and Continuous Emissions Monitor Report Logs

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Combination Boiler No. 1

Reporting Period 7/1/20 to 12/31/20

ID 2605

Permit Conditions: C.13, C.64, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				EP Bypass Time	Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)			
There were no excursion events or downtime during the month of July 2020.										
There were no excursion events or downtime during the month of August 2020.										
1	9/30/20	12:18 PM	-	x			66		Quarterly Audit	Complete Audit
1	10/18/20	12:24 PM	56	x			6		Lost igniter gas. Could not purge bypass to relight the gas burners.	Reset gas burners and resumed boiler operation.
2	10/26/20	3:15 PM	-	x			15		Purge alarm on monitor	Changed retro side purge switch and cleaned filters
1	11/3/20	4:24 AM	42	x			6		EP field tripped.	Reset power to EP.
2	11/5/20	3:44 PM	44	x			6		TR Set tripped out.	Stopped bark combustion. Reset power to TR Set.
3	11/11/20	8:00 PM	48	x			6		EP field tripped.	Reset power to EP.
4	11/13/20	8:30 AM	48	x			6		TR Set tripped out.	Reset power to EP.
5	11/13/20	10:36 AM	43	x			6		TR Set tripped out.	Reset power to EP.
6	11/15/20	2:30 PM	45	x			6		EP field tripped.	Reset power to EP.
7	11/19/20	8:30 AM	53	x			12		TR1 & TR2 tripped out.	Reset power to EP.
8	11/24/20	6:27 PM	49	x			6		TR Set tripped out.	Reset power to EP.
9	11/27/20	2:00 PM	49	x			6		TR Set tripped out.	Reset power to EP.
10	11/27/20	2:24 PM	51	x			12		TR Set tripped out.	Reset power to EP.
11	11/27/20	3:30 PM	57	x			6		TR Set tripped out.	Reset power to EP.
1	12/1/20	5:36 AM	43	x			6		Boiler tripped offline.	Restarted boiler.
2	12/24/20	9:12 PM	45	x			6		Heavy Rains resulted in high opacity reading.	Precipitation event abated.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Combination Boiler No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2605

Permit Conditions: C.13, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				EP Bypass Time	Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)			
1	7/8/20	6:19 AM	-	x			71	71	Fire in hopper	Pulled bark, added gas, bypassed EP, washed hopper
2	7/8/20	7:30 AM	-	x			1050	1050	EP drag chain broke	Removed bark, isolated EP, maintenance repaired chain
3	7/22/20	1:42 AM	59	x			6		Wet bark	Increased air
4	7/24/20	4:06 PM	56	x			6		Wet bark	Cut fuel
1	8/1/20	8:30 AM	-	x			30		Checking monitor	Cleaned lens
2	8/7/20	8:30 AM	50	x			6		Shutting down boiler for annual maintenance	Shutdown
There were no excursion events or downtime during the month of September 2020.										
1	10/31/20	3:42 AM	48	x			6		Wet bark due to heavy rains	Reduced bark burning and switched to natural gas
1	11/24/20	4:46 PM	49	x			6		TR Set Issues.	Reduced bark burning.
2	11/26/20	6:27 PM	45	x			6		Blowing IKS	Reversed IK
1	12/16/20	8:06 AM	80	x			36		Wet bark piling on grates.	Turned off bark screws, leveled bark piles on grates.
2	12/16/20	10:12 AM	40	x			6		Wet bark piling on grates.	Turned off bark screws, leveled bark piles on grates.
3	12/20/20	4:12 AM	42	x			6		Sand piled up on the grates.	Reduced bark burning and increased air flow.
4	12/20/20	4:42 AM	40	x			6		Sand piled up on the grates.	Reduced bark burning and increased air flow.
5	12/22/20	10:30 AM	-	x			10		Checking monitor	Cleaned lens
6	12/24/20	9:06 PM	57	x			6		Heavy Rains resulted in high opacity reading.	Precipitation event abated.
7	12/25/20	8:06 PM	42	x			6		Full ash hopper, resulting in ash carryover.	Emptied hopper, reduced bark combustion.
8	12/25/20	8:00 PM	-	x			103		Dirty Lens	Cleaned lens and perform calibration

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Combination Boiler No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2605

Permit Conditions: C.13, C.65

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				EP Bypass Time	Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)			
9	12/28/20	3:12 PM	48	x			6		Wet bark piling on grates.	Reduced bark burning and increased air flow.
10	12/28/20	5:30 PM	47	x			6		Wet bark piling on grates.	Reduced bark burning and increased air flow.
11	12/29/20	2:58 PM	49	x			6		Wet bark piling on grates.	Reduced bark burning and increased air flow.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

High Volume Low Concentration Gas System

Reporting Period 7/1/20 to 12/31/20

ID 2605, ID 3705, ID 5210, ID 5250, ID 5270

Permit Conditions: C.13

This report is for indicated emissions from the fiberline, pulp washing systems, oxygen delignification, and screening/knotting systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time	HVLC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
1	7/4/2020	5:11 AM	PH: HVLC	6	Low steam flow on CB2	Increased steam flow to CB2
2	7/7/2020	11:14 PM	PH: HVLC	55	Water in HVLC line from fiberline	Tripped out system, drain water
3	7/9/2020	1:39 AM	FL: HVLC	5	Unknown	Unknown
4	7/17/2020	10:52 AM	PH: HVLC	7	Lost bark in boiler, low steam flow	Re-established boiler steam rate
5	7/17/2020	11:52 AM	PH: HVLC	8	Lost bark in boiler, low steam flow	Re-established boiler steam rate
1	8/15/2020	2:46 PM	PH: HVLC	37	Heavy rain caused malfunction in fire alarm monitor	Washed hoppers
2	8/15/2020	3:19 PM	PH: HVLC	5	Heavy rain caused malfunction in fire alarm monitor	Trouble getting system back in boiler
3	8/28/2020	9:25 PM	FL: HVLC	64	Lost warm water feed, Shtudown process which caused rupture disk to blow	Replaced rupture disk
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
1	11/12/2020	11:01 AM	PH: HVLC	20	Low steam flow	Increased steam flow
2	11/13/2020	10:57 AM	PH: HVLC	34	RB3 tripped resulting in low 150# steam header pressure. Could not reset the LVHC burner.	Started RB3
3	11/13/2020	1:10 PM	PH: HVLC	47	RB3 tripped resulting in low 150# steam header pressure. Could not reset the LVHC burner.	Started RB3
4	11/13/2020	4:20 PM	PH: HVLC	54	RB3 tripped resulting in low 150# steam header pressure. Could not reset the LVHC burner.	Started RB3
5	11/14/2020	7:50 PM	FL: HVLC	15	DCS Issues with the Chip Bin Pressure Indicator	Reset DCS
6	11/14/2020	10:06 PM	FL: HVLC	21	DCS Issues with the Chip Bin Pressure Indicator	Reset DCS
7	11/16/2020	12:03 AM	PH: HVLC	5	Unknown	Unknown
8	11/16/2020	2:01 AM	PH: HVLC	5	Unknown	Unknown
9	11/27/2020	9:56 PM	PH: HVLC	33	Low steam flow	Regained header pressure.
10	11/28/2020	5:16 AM	PH: HVLC	40	Turbine Tripped causing 150# Header pressure to drop.	Restarted turbine, stabilizing 150# steam header.
11	11/28/2020	8:40 AM	PH: HVLC	22	RB3 tripped resulting in low 150# steam header pressure.	Started RB3

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

High Volume Low Concentration Gas System

Reporting Period 7/1/20 to 12/31/20

ID 2605, ID 3705, ID 5210, ID 5250, ID 5270

Permit Conditions: C.13

This report is for indicated emissions from the fiberline, pulp washing systems, oxygen delignification, and screening/knotting systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time	HVLC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
12	11/28/2020	9:32 AM	PH: HVLC	33	150# Steam Header Pressure low.	Regained header pressure with the restart of RB3.
13	11/29/2020	12:11 AM	PH: HVLC	8	Turbine Tripped causing 150# Header pressure to drop.	Regained header pressure.
14	11/29/2020	2:26 AM	PH: HVLC	7	150# Steam Header Pressure low.	Regained header pressure.
15	11/30/2020	1:33 AM	PH: HVLC	10	Unknown	Unknown
16	11/30/2020	4:41 PM	FL: HVLC	20	Chip Bin Venting	Reset Vent
1	12/1/2020	5:30 AM	FL:HVLC	12	CB1 Tripped.	Routed gasses to CB2.
2	12/18/2020	3:34 PM	PH:HVLC	7	Lost gas pressure, tripping out the burner.	Restarted burner.
3	12/19/2020	12:56 PM	PH:HVLC	40	Lost gas pressure, tripping out the burner.	Restarted burner.
4	12/26/2020	1:43 AM	PH:HVLC	38	Vent valve malfunction on PM3 reduced 150# steam header pressure.	Restored header pressure.
5	12/26/2020	9:22 AM	PH:HVLC	23	Steam flow transmitter froze (water in air line), resulting in no steam to ejector.	Tnawed out transmitter and insulated to prevent a repeat event.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Kraft Process - Bleach Plant Scrubber

Reporting Period 7/1/20 to 12/31/20

ID 5300C

Permit Conditions: C.15

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
There were no excursion events or downtime during the month of July 2020.									
There were no excursion events or downtime during the month of August 2020.									
There were no excursion events or downtime during the month of September 2020.									
There were no excursion events or downtime during the month of October 2020.									
There were no excursion events or downtime during the month of November 2020.									
There were no excursion events or downtime during the month of December 2020.									

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Chlorine Dioxide Scrubber

Reporting Period 7/1/20 to 12/31/20

ID 1790

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

Incident No.	Date	Start Time	Parameter pH, Flow, delta P	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
There were no excursion events or downtime during the month of December 2020.						

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Starch Silo Dust Collectors

Reporting Period 7/1/20 to 12/31/20

ID B-2000

Permit Conditions: C.27, C.28

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

Incident No.	Date	Start Time	Parameter Opacity (Yes/No)	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
There were no excursion events or downtime during the month of December 2020.						

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Recovery Boiler No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2505

Permit Conditions: C.39

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	7/1/2020	1:33 PM	-	x			1437	Following startup of furnace, opacity monitor faulted, local resources could not resolve faults so offsite resources were brought onsite for troubleshooting and repair	Opacity head removed from stack, cleaned, ran offstack calibration, adjusted voltages, performed zero and span
2	7/18/2020	1:50 PM	-	x			10	Out of alignment	Realigned monitor
3	7/25/2020	7:10 AM	-	x			125	Out of alignment, Dirty lens	Cleaned lens, aligned monitor
4	7/26/2020	12:36 AM	-	x			6	Unknown	Unknown
5	7/27/2020	10:18 PM	-	x			12	Checking monitor alignment	Aligned monitor
6	7/27/2020	10:30 PM	69	x			18	Two rappers on south field not working, Fuel control system malfunctioned	Pulled liquor guns, closed and isolated south inlet, repair rapper gear box
7	7/27/2020	9:36 PM	Avg>20%	x			174	Two rappers on south field not working, Fuel control system malfunctioned	Pulled liquor guns, closed and isolated south inlet, repair rapper gear box
8	7/29/2020	9:42 PM	-	x			6	Checking monitor alignment	Ran calibration
9	7/31/2020	4:54 AM	65.7	x			18	EP fields tripped	Tried to reset fields, cut air and liquor
10	7/31/2020	4:18 AM	Avg>20%	x			102	EP fields tripped	Tried to reset fields, cut air and liquor
1	8/13/2020	4:06 PM	45	x			6	Working on EP fields, open EP damper	Closed damper
2	8/21/2020	12:00 PM	80	x			18	Unknown - Heavy rain in area (possible instrument error)	Monitor self corrected
There were no excursion events or downtime during the month of September 2020.									
There were no excursion events or downtime during the month of October 2020.									
There were no excursion events or downtime during the month of November 2020.									
There were no excursion events or downtime during the month of December 2020.									

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Lime Kiln No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2723

Permit Conditions: C.39, C.44

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	7/12/20	1:06 PM	29	x			6	Start up from kiln outage	Completed startup
1	8/21/20	6:50 AM	-	x			20	Excessive dust drift alarm	Cleaned filters and lens, ran cal
1	9/1/20	3:06 PM	24	x			24	Lime kiln startup	Put fire and mud back in kiln
There were no excursion events or downtime during the month of October 2020.									
1	11/15/20	7:12 PM	27	x			6	Lime kiln startup	Put fire and mud back in kiln
1	12/6/20	9:06 AM	21	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
2	12/6/20	9:36 AM	24	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
3	12/6/20	10:18 AM	34	x			18	Lime kiln startup and precipitator tripping out.	Restart precipitator
4	12/6/20	11:00 AM	20	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
5	12/6/20	11:18 AM	22	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
6	12/6/20	2:30 PM	22	x			12	Lime kiln startup and precipitator tripping out.	Restart precipitator
7	12/6/20	3:00 PM	21	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
8	12/6/20	4:18 PM	23	x			12	Lime kiln startup and precipitator tripping out.	Restart precipitator
9	12/6/20	4:48 PM	22	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
10	12/6/20	5:30 PM	27	x			18	Lime kiln startup and precipitator tripping out.	Restart precipitator
11	12/6/20	7:48 PM	26	x			66	Lime kiln startup and precipitator tripping out.	Restart precipitator
12	12/7/20	6:36 AM	37	x			6	Lime kiln startup and precipitator tripping out.	Restart precipitator
13	12/13/20	7:36 AM	20	x			6	Lime kiln starting up.	Bring kiln up to full operation and opacity dropped to 6%.
14	12/13/20	7:54 AM	23	x			24	Lime kiln starting up.	Bring kiln up to full operation and opacity dropped to 6%.
15	12/13/20	8:36 AM	26	x			12	Lime kiln starting up.	Bring kiln up to full operation and opacity dropped to 6%.
16	12/29/20	8:20 AM	-	x			25	Monitor reading too low.	Aligned and ran calibration

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Smelt Dissolving Tank Vent Scrubber

Reporting Period 7/1/20 to 12/31/20

ID 2510, ID 5110

Permit Conditions: C.40, C.57

This report is for variations outside of surrogate monitoring parameters or permit exception conditions.

Incident No.	Date	Start Time	Parameter Pump Pressure, Flow, delta P	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
1	12/16/20	7:00 PM	Weak Wash Flow	1140	Flowmeter Failure	Replaced flowmeter

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Recovery Boiler No. 3

Reporting Period 7/1/20 to 12/31/20

ID 5105

Permit Conditions: C.41, C.42

This report is for incidents of excess opacity (reported in % opacity), opacity monitor downtime or repair, or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
There were no excursion events or downtime during the month of July 2020.									
There were no excursion events or downtime during the month of August 2020.									
1	9/4/20	4:18 PM	50	x			12	Shutting down boiler, removing liquor	Shutdown boiler
1	10/29/20	4:30 AM	-	x			48	Monitor misalignment	Realigned reflector and monitor
1	11/13/20	5:54 AM	43	x			12	East side precipitator gear box failure	Backed off liquor combustion.
2	11/13/20	5:30 AM	Avg>20%	x			72	East side precipitator gear box failure	Backed off liquor combustion.
3	11/13/20	9:34 AM	-	x			78	Door Open on Monitor, Resulting in False High Readings	Closed door. Aligned monitor.
1	12/6/20	5:18 PM	70	x			12	Monitor misalignment	Boiler starting up. Warming up stack. Alignement corrected as stack warmed up.
2	12/29/20	9:30 PM	40	x			6	Attempting to place a second liquor gun online, could not get enough air into the boiler.	Increased air and took the second gun offline.
3	12/29/20	9:30 PM	Avg>20%	x			90	Attempting to place a second liquor gun online, could not get enough air into the boiler.	Increased air and took the second gun offline.
4	12/30/20	12:10 PM	-	x			50	Cleaning and calibration	None
5	12/31/20	12:40 PM	Avg>20%	x			44	Precipator rappers not working in automatic mode.	Adjusted the air flow to boiler, pulled liquor and put the rapper into manual mode.
6	12/31/20	12:30 PM	-	x			10	Cleaning and calibration	None
7	12/31/20	3:54 AM	36	x			6	Unknown.	Pulled liquor gun and adjusted air.
8	12/31/20	3:50 PM	-	x			25	Cleaning and calibration	None
9	12/31/20	4:15 PM	Avg>20%	x			93	Precipator rappers not working in automatic mode.	Adjusted the air flow to boiler, pulled liquor and put the rapper into manual mode.
10	12/31/20	4:36 PM	46	x			12	Precipator rappers not working in automatic mode.	Adjusted the air flow to boiler, pulled liquor and put the rapper into manual mode.
11	12/31/20	7:42 AM	37	x			6	Precipator rappers not working in automatic mode.	Adjusted the air flow to boiler, pulled liquor and put the rapper into manual mode.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Slaker Scrubber

Reporting Period 7/1/20 to 12/31/20

ID 2725C

Permit Conditions: C.45 and C.46

This report is for variations outside of surrogate monitoring parameters or permit condition exceptions.

Incident No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow			
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
There were no excursion events or downtime during the month of December 2020.						

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Recovery Boiler No. 3

Reporting Period 7/1/20 to 12/31/20

ID 5105

Permit Conditions: C.51

This report is for indicated excessive NOx (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	NOx	O2	Duration (Minutes)		
There were no excursion events or downtime during the month of July 2020.									
1	8/12/20	9:50 AM	-		x		60	Cal gas bottle low	Changed gas bottle, ran manual and normal cal
2	8/19/20	6:00 PM	-		x		35	Checking monitor	Ran calibration
3	8/20/20	10:20 PM	-		x		20	Checking monitor	Ran calibration
4	8/21/20	9:30 AM	-		x		360	Checking monitor	Checked for leaks, replaced probe filter, checked PMT voltage, ran calibration
There were no excursion events or downtime during the month of September 2020.									
1	10/31/20	8:15 AM	-		x		165	Failed calibration	Changed gas bottle, ran manual and normal cal
1	11/16/20	11:00 PM	-		x		60	False Reading - Exceeded Span of Monitor	None, Monitor came back into range and following day zero and span test passed.
2	11/24/20	12:00 AM	-		x		60	False Reading - Exceeded Span of Monitor	None, Monitor came back into range and following day zero and span test passed.
3	11/25/20	9:45 AM	-		x		60	Cleaning/Calibration	Ran calibration
1	12/22/20		80		x			Exceeded the 10-day rolling average of 78 ppm.	Fuel swap to #6 fuel oil.
2	12/23/20		80		x			Exceeded the 10-day rolling average of 78 ppm.	Fuel swap to #6 fuel oil.
3	12/24/20		79		x			Exceeded the 10-day rolling average of 78 ppm.	Fuel swap to #6 fuel oil.
4	12/31/20	11:00 AM			x		60	False Reading - Exceeded Span of Monitor	None, Monitor came back into range and following day zero and span test passed.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Low Volume High Concentration Gas System

Reporting Period 7/1/20 to 12/31/20

ID 5260C

Permit Conditions: C.53

This report is for indicated emissions from the digester and/or multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
There were no excursion events or downtime during the month of December 2020.						

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Low Volume High Concentration Gas System

Reporting Period 7/1/20 to 12/31/20

ID 2605, ID 3705

Permit Conditions: C.53

This report is for indicated emissions from the digester and/or multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
1	7/1/2020	5:12 PM	LVHC - PH	42	Lost flame indication on the boiler, system vented	Found wiring issue on flame detector on the boiler, repaired wiring, system got back in service
2	7/17/2020	10:52 AM	LVHC-PH	6	Lost bark in boiler, low steam flow	Re-established boiler steam rate
1	8/15/2020	2:46 PM	LVHC-PH	23	Fire alarm malfunction due to heavy rain	Washed hoppers
2	8/31/2020	9:39 PM	LVHC-PH/FL	59	Lost steam header, boilers tripped	Shutdown evaporators and reestablish steam header
1	9/1/2020	5:47 AM	LVHC-FL	23	Lost steam header, boilers tripped	Reestablish steam header
2	9/1/2020	8:55 AM	LVHC - All	72	Mill upset conditions due to boiler tripped	Reestablish steam header
3	9/1/2020	11:53 AM	LVHC - Evap 1 & 2	11	Mill upset conditions due to boiler tripped	Reestablish steam header
4	9/1/2020	12:13 PM	LVHC - Evap 1 & 2	38	Mill upset conditions due to boiler tripped	Reestablish steam header
5	9/1/2020	6:42 PM	LVHC - FL	9	Mill upset conditions due to boiler tripped	Reestablish steam header
6	9/1/2020	7:47 PM	LVHC - FL	6	Mill upset conditions due to boiler tripped	Reestablish steam header
There were no excursion events or downtime during the month of October 2020.						
1	11/3/2020	4:20 PM	LVHC - Turpentine Decanter	19	I/O Checkout during mill startup. Toggled high high pressure switches on turpentine decanter and blew fuse in PLC 51-24-01.	Replaced blown fuse.
2	11/4/2020	6:24 PM	LVHC-FL	30	System checkout by contractor as part of mill return to operation caused the DCS to fail, resulting in a false Hi Hi pressure alarm at the evaps.	Completed system checkup, returned FL DCS to operation.
3	11/12/2020	7:38 AM	LVHC-FL	11	Fiberline DCS issue, resulting in false hi pressure reading in the collection system.	Reset Fiberline DCS.
4	11/14/2020	1:56 PM	LVHC - All	52	Lost 150# Steam flow.	Reestablish steam header
5	11/18/2020	2:21 PM	LVHC - All	17	Lost 150# Steam flow.	Reestablish steam header
6	11/19/2020	1:09 PM	LVHC - All	7	Lost 150# Steam flow.	Reestablish steam header
7	11/23/2020	3:06 PM	LVHC - All	9	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
8	11/23/2020	4:26 PM	LVHC - All	15	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Low Volume High Concentration Gas System

Reporting Period 7/1/20 to 12/31/20

ID 2605, ID 3705

Permit Conditions: C.53

This report is for indicated emissions from the digester and/or multiple effect evaporator systems exceeding 5 minutes duration, or permit condition exceptions.

Incident No.	Date	Start Time	LVHC System Leg	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
9	11/23/2020	5:36 PM	LVHC - All	2	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
10	11/23/2020	5:44 PM	LVHC - All	2	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
11	11/23/2020	7:55 PM	LVHC - All	56	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
12	11/23/2020	9:18 PM	LVHC - All	57	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
13	11/23/2020	10:28 PM	LVHC - All	5	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
14	11/23/2020	10:57 PM	LVHC - All	15	#1 PRV stuck closed, resulting in fluctuating pressure on the 150# header.	Opened 1A PRV Valve and adjusted the 150# header.
1	12/1/2020	5:30 AM	LVHC - All	23	CB1 Tripped.	Routed gasses to CB2
2	12/1/2020	6:07 AM	LVHC - All	7	LVHC Burner Tripped	Reset Burner
3	12/1/2020	8:15 AM	LVHC - All	12	Low 150# Steam Header Pressure	Started up RB3 and reset LVHC.
4	12/1/2020	9:01 AM	LVHC - All	9	Low 150# Steam Header Pressure	Started up RB3 and reset LVHC.
5	12/3/2020	5:15 PM	LVHC - All	9	Unknown	Unknown
6	12/7/2020	2:22 PM	LVHC - All	20	Tripped steam injector to CB1 due to high temperature.	Lowered temperature on the LVHC steam ejector.
7	12/8/2020	1:42 AM	LVHC - All	10	Loss of flame to burner	Relit burner
8	12/11/2020	7:04 PM	LVHC - All	29	#2 Turbine tripped out, causing the 150# header to swing.	Opened collection valve on #3 Evaporator.
9	12/16/2020	6:20 AM	LVHC - All	60	Low 150# Steam Header Pressure	Reestablish steam header
10	12/16/2020	8:09 AM	LVHC - All	32	RB3 Tripped.	Started up RB3 and reset LVHC.
11	12/19/2020	1:03 PM	LVHC - All	25	Bark belt plugged up, resulting in the 150# steam header pressure dropping.	Unplugged the bark belt, resumed bark combustion.
12	12/29/2020	8:14 PM	LVHC -All	21	TG1 & RB2 tripped, resulting in lower 150# steam header pressure.	Opened the bypass on the PRVs and reset the LVHC system.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Recovery Boiler No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2505

Permit Conditions: C.54

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
There were no excursion events or downtime during the month of July 2020.									
There were no excursion events or downtime during the month of August 2020.									
There were no excursion events or downtime during the month of September 2020.									
There were no excursion events or downtime during the month of October 2020.									
There were no excursion events or downtime during the month of November 2020.									
1	12/12/20	12:00 AM	-		x		160	No sample	Cleaned the inductor orifice and changed probe filter.
2	12/31/20	1:00 PM	-		x		35	Failed Oxygen span drift calibration	Adjusted oxygen monitor. Performed new calibration.

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Recovery Boiler No. 3

Reporting Period 7/1/20 to 12/31/20

ID 5105

Permit Conditions: C.55

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
There were no excursion events or downtime during the month of July 2020.									
1	8/12/20	9:50 AM	-		x		60	Cal gas bottle low	Replace bottle, ran calibrations with new gas
2	8/19/20	6:00 PM	-		x		35	Checking monitor	Ran manual calibration
3	8/20/20	10:20 PM	-		x		20	Checking monitor	Ran manual calibration
4	8/21/20	9:30 AM	-		x		360	Checking monitor	Checked for leaks, replaced probe filter, checked PMT voltage, ran calibration
There were no excursion events or downtime during the month of September 2020.									
There were no excursion events or downtime during the month of October 2020.									
1	11/2/20	10:45 AM	-		x		105	TRS cal gas bottle low	Changed gas bottle, ran manual and normal cal
There were no excursion events or downtime during the month of December 2020.									

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Lime Kiln No. 2

Reporting Period 7/1/20 to 12/31/20

ID 2723

Permit Conditions: C.58

This report is for indicated excessive TRS (reported in ppm), monitor downtime or repair (including O2 monitor), or permit condition exceptions.

Incident No.	Date	Start Time	% Opacity or ppm	Monitor (Check One)				Nature and Cause of Incident	Corrective Action
				OPA	TRS	O2	Duration (Minutes)		
1	7/9/20	8:00 AM	-		x		45	Checking unit, TRS reading very low	Spanned gas, ran cal. Monitor ok.
There were no excursion events or downtime during the month of August 2020.									
There were no excursion events or downtime during the month of September 2020.									
There were no excursion events or downtime during the month of October 2020.									
There were no excursion events or downtime during the month of November 2020.									
There were no excursion events or downtime during the month of December 2020.									

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CONTINUOUS EMISSION MONITOR SEMI-ANNUAL REPORT LOG

Condensate Steam Stripper

Reporting Period 7/1/20 to 12/31/20

ID 9801 **TV**

Permit Condition MACT.2

This report is for variations below mimimum 15-day average collection (11.1 #/ODTP) and treatment (10.2 #/ODTP).

Incident No.	Date	Start Time	Parameter	Duration (Minutes)	Nature and Cause of Incident	Corrective Action
			Flow and Steam			
There were no excursion events or downtime during the month of July 2020.						
There were no excursion events or downtime during the month of August 2020.						
There were no excursion events or downtime during the month of September 2020.						
There were no excursion events or downtime during the month of October 2020.						
There were no excursion events or downtime during the month of November 2020.						
There were no excursion events or downtime during the month of December 2020.						