

**TECHNICAL REVIEW AND EVALUATION  
OF APPLICATION FOR  
AIR QUALITY PERMIT NO. 46898  
Catalyst Paper (Snowflake) Inc.**

**I. INTRODUCTION**

This is a renewal Class I, Title V air quality control permit for the operation of a paper mill near Snowflake in Navajo County, Arizona. This permit renews and supersedes Operating Permit #M170424P1-99. The facility is owned and operated by Catalyst Paper (Snowflake) Inc (CPSI). The paper mill produces approximately 1,460 tons per day of newsprint and newsprint-like grades from recycled newsprint, magazines and purchased pulp.

**A. Company Information**

|                    |  |
|--------------------|--|
| Facility Name:     | Catalyst Paper Mill  |
| Facility Location: | 14 miles west of Snowflake<br>Approximately 1.5 miles north of Arizona highway 277 |
| Mailing Address:   | P.O. Box 128<br>Snowflake, Arizona 85937   |

**B. Attainment Classification**

The Snowflake area is in attainment for all criteria pollutants.

**C. Learning Sites Evaluation**

In accordance with ADEQ's Environmental Permits and Approvals Near Learning Sites Policy, the Department conducted an evaluation to determine if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

There are no learning sites within two miles of the facility.

**II. FACILITY DESCRIPTION**

**A. Process Description**

1. Paper Recycling and Production

The paper mill receives its raw material in the form of old newspapers, magazines and purchased pulp. This material is mixed with water, process chemicals, and steam to form a slurry. The slurry travels to Deinking Machines #2 and #3 where it is processed and screened to remove ink and impurities. The slurry is then processed in Paper Machines #1 and #3 into varying grades of newsprint and newsprint-like paper. The mill produces approximately 1,460 tons of paper per day.

2. Power Boilers

Power Boilers #1, #2, and #3 produce all the steam and electricity needed by the paper

mill. Power Boiler #2 has a maximum capacity of 1,132 million Btu per hour (MMBtu/hr). It is the primary source of electricity and steam at the mill and combusts mainly coal. Power Boilers #1 and #3 are stand-by units, have a maximum capacity of 523 MMBtu/hr and 337 MMBtu/hr respectively, and combust natural gas and fuel oil #2.

3. Coal Handling Facility

The coal combusted in Power Boiler #2 is received by truck or rail. The delivered coal is stored in a storage pile. As needed, the coal travels by conveyor belts to a crusher and the crushed coal is stored in one of four silos. Coal is combusted in Power Boiler #2 at the rate of 61 tons per hour.

4. Wastewater Treatment Plant

The wastewater treatment plant is used to treat the effluent from the mill. The clarified water from the treatment plant is either stored in one of two ponds or used in the biomass plantation to grow various crops. The solid sludge from the treatment plant is used to fire the boiler at the nearby Snowflake White Mountain Power facility.

5. Ash Pond

Ash from Power Boiler #2 is sluiced to one of two storage ponds. There it is kept moist to reduce fugitive particulate matter emissions. Once a pond reaches capacity, it is allowed to dry out and the ash is loaded onto trucks and landfilled on site.

**B. Air Pollution Control Equipment**

**Table 1 – Air Pollution Control Equipment**

| <b>Emission Unit</b>   | <b>Control Device</b>            | <b>Controlled Pollutant</b> |
|------------------------|----------------------------------|-----------------------------|
| Power Boiler #2        | Electrostatic Precipitator (ESP) | PM                          |
| Power Boiler #2        | Slipstream Alkaline Scrubber     | SO <sub>2</sub>             |
| Power Boiler #3        | Low NO <sub>x</sub> Burner       | NO <sub>x</sub>             |
| Coal Handling Facility | Water Sprays                     | PM                          |
| Soda Ash Silo          | Baghouse                         | PM                          |

**III. COMPLIANCE HISTORY**

There have been 62 inspections of this facility since 1992 and one Notice of Violation (NOV) associated with Permit #M170424P1-99. The NOV was issued on December 10, 2003, for violating the opacity limit on Power Boiler #2 on seven occasions and for not properly operating the pollution control equipment on Power Boiler #2. At the time the facility was owned by Abitibi Consolidated and not by CPSI. Abitibi Consolidated was required to achieve compliance by January 14, 2004, and the NOV was closed on April 13, 2004. There are no current violations associated with this facility.

#### IV. EMISSIONS

Emissions from this facility result from the Power Boilers and the paper recycling process.

**Table 2: Potential to Emit (PTE) of Facility**

| Pollutant                           | Facility PTE<br>tons per year (tpy) |
|-------------------------------------|-------------------------------------|
| PM <sub>10</sub> /PM <sub>2.5</sub> | 78.3                                |
| PM                                  | 164                                 |
| NO <sub>x</sub>                     | 4,150                               |
| CO                                  | 495                                 |
| SO <sub>2</sub>                     | 2,130                               |
| VOC                                 | 47.2                                |
| HAPS                                | 131                                 |

- 1- AP-42 and "Pulp, Paper, and Paperboard Industry - Background Information for Proposed Air Emission Standards" used for all emissions except where test data is available. See application for more information.
- 2- All emissions based on continuous operation.

#### V. APPLICABLE REGULATIONS

Table 3 identifies applicable regulations and verification as to why that standard applies.

**Table 3: Verification of Applicable Regulations**

| Unit            | Control Device                             | Rule   | Verification  |
|-----------------|--|--|---|
| Power Boiler #1 | None                                       | A.A.C. R18-2-702.B.3<br>A.A.C. R18-2-702.C<br>A.A.C. R18-2-703.C.1<br>A.A.C. R18-2-703.E.1<br>A.A.C. R18-2-703.H<br>A.A.C. R18-2-703.K | Power Boiler #1 is a fossil-fuel fired steam generating unit which has a capacity greater than 73 megawatts and its construction was commenced before August 17, 1971.<br><br>The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources.<br><br>The National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #1 but was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. Upon the promulgation of a new NESHAP for industrial boilers, those standards may apply to Power Boiler #1. |
| Power Boiler #2 | ESP for PM<br>Scrubber for SO <sub>2</sub> | A.A.C.R18-2-903.1<br>40 CFR 60 Subpart D   | New Source Performance Standard (NSPS) Subpart D applies to Power Boiler #2 because it is a fossil-fuel fired steam generating unit which has a heat input rate greater than 73 megawatts and its construction was commenced after August 17, 1971.<br><br>National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #2 but was vacated by the Court of Appeals for the District of Columbia on June   |

| Unit  | Control Device             | Rule   | Verification   |
|---|----------------------------|--|--|
|   |                            |  | <p>8, 2007. Upon the promulgation of a new NESHAP for Industrial Boilers, those standards may apply to Power Boiler #2.</p> <p>Compliance Assurance Monitoring (CAM) applies to Power Boiler #2 for PM and SO<sub>2</sub> because it is subject to emission limitations for these pollutants, uses a control device to achieve those standards, and has pre-control PTE greater than 100 tpy.</p>  |
| Power Boiler #3   | Low NO <sub>x</sub> Burner | 40 CFR 60 Subpart Db   | <p>NSPS Subpart Db applies to Power Boiler #3 because it is a steam generating unit which has a heat input capacity greater than 29 megawatts and its construction was commenced after June 19, 1984.</p> <p>National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart DDDDD applied to Power Boiler #3 but was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. Upon the promulgation of a new NESHAP for Industrial Boilers, those standards may apply to Power Boiler #3.</p> |
| General Regulations for Continuous Monitoring Systems (CMS) | None                       | 40 CFR 60.7(b)<br>40 CFR 60.7(c)<br>40 CFR 60.7(d)<br>40 CFR 60.7(f)<br>40 CFR 60.13(a)<br>40 CFR 60.13(c)<br>40 CFR 60.13(c)(2)<br>40 CFR 60.13(d)(1)<br>40 CFR 60.13(d)(2)<br>40 CFR 60.13(e)(1)<br>40 CFR 60.13(e)(2)<br>40 CFR 60.13(h)(1)<br>40 CFR 60.13(h)(2) | <p>These standards are applicable to the Power Boiler #2 Continuous Opacity Monitoring System (COMS), the Power Boiler #2 SO<sub>2</sub> Continuous Emission Monitoring System (CEMS), and the Power Boiler #3 NO<sub>x</sub> CEMS.</p>  |
| Coal Handling Facility                                      | Water Sprays               | A.A.C. R18-2-702.B.3<br>A.A.C. R18-2-716.B.1<br>A.A.C. R18-2-716.B.2   | <p>These standards are applicable to coal preparation facilities which commenced construction before October 24, 1974.</p> <p>The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources.</p>   |
| Internal Combustion Engines                                 | None                       | A.A.C. R18-2-719.B<br>A.A.C. R18-2-719.C.1<br>A.A.C. R18-2-719.E<br>A.A.C. R18-2-719.F<br>A.A.C. R18-2-719.H<br>A.A.C. R18-2-719.J<br>40 CFR 63 Subpart ZZZZ   | <p>These standards are applicable to diesel internal combustion engines manufactured before April 1, 2006.</p> <p>The National Emission Standard for Hazardous Air Pollutants (NESHAP) Subpart ZZZZ is applicable to reciprocating internal combustion engines located at major sources of HAPs.</p>   |

| Unit  | Control Device                                     | Rule   | Verification   |
|---|--|--|--|
| Fuel Burning Equipment                          | None   | A.A.C. R18-2-724.C.1<br>A.A.C. R18-2-724.J   | These standards apply to fossil fuel fired industrial equipment rated at between 0.5 MMBtu/hr and 250 MMBtu/hr in which the products of combustion do not come into direct contact with process materials. |
| Paper Machine #1                                | Baghouse on Soda Ash Silo                          | A.A.C. R18-2-702.B.3<br>A.A.C. R18-2-730.A<br>A.A.C. R18-2-730.A.2   | The standards from A.A.C. R18-2-730 apply to unclassified sources.   |
| Paper Machine #3                                | Water on Ash Pond                                  | A.A.C. R18-2-730.A.3<br>A.A.C. R18-2-730.D<br>A.A.C. R18-2-730.F<br>A.A.C. R18-2-730.G<br>A.A.C. R18-2-730.H   | The opacity standards from A.A.C R18-2-702 apply to existing stationary point sources.   |
| Corrugated Waste Area                           |  |  |  |
| De-inking Systems                               |  |  |  |
| Waste Water Treatment Plant                     |  |  |  |
| Ash Pond  |  |  |  |
| Storage tanks not covered by other requirements |  |  |  |
| Soda Ash Silo                                   |  |  |  |
| Cooling Towers                                  |  |  |  |
| 4,000 gallon gasoline tank                      | Submerged filling device;<br>Pump/compressor seals | A.A.C. R18-2-710.B<br>A.A.C. R18-2-710.D<br>A.A.C. R18-2-710.E.1   | These standards apply to existing storage vessels for petroleum liquids.<br><br>NESHAP Subpart CCCCCC does not apply to major sources of HAPS.   |
| Fugitive dust sources                           | Water and other reasonable precautions.            | A.A.C. R18-2-604.A<br>A.A.C. R18-2-604.B<br>A.A.C. R18-2-605.A<br>A.A.C. R18-2-605.B<br>A.A.C. R18-2-606<br>A.A.C. R18-2-607.A<br>A.A.C. R18-2-607.B<br>A.A.C. R18-2-614<br>A.A.C. R18-2-702.B | These standards are applicable to all fugitive dust sources at the facility.   |
| Mobile sources                                  | Water Sprays/Water Truck for dust control          | A.A.C. R18-2-801.A<br>A.A.C. R18-2-801.B<br>A.A.C. R18-2-802.A<br>A.A.C. R18-2-802.B<br>A.A.C. R18-2-804.A<br>A.A.C. R18-2-804.B   | These are applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization.   |
| Abrasive Blasting                               | Wet blasting;<br>Dust collecting equipment;        | A.A.C. R-18-2-702.B<br>A.A.C. R-18-2-726   | These standards are applicable to any abrasive blasting operation.   |

| Unit                               | Control Device         | Rule   | Verification   |
|------------------------------------|------------------------|--|--|
|                                    | Other approved methods |  |  |
| Spray Painting                     | Enclosures             | A.A.C. R18-2-702.B<br>A.A.C. R-18-2-727.A<br>A.A.C. R-18-2-727.B<br>A.A.C. R-18-2-727.C<br>A.A.C. R-18-2-727.D | This standard is applicable to any spray painting operation.                             |
| Demolition / renovation operations | N/A                    | A.A.C. R18-2-1101.A.8  | This standard is applicable to any asbestos related demolition or renovation operations. |

## VI. NESHAP SUBPART DDDDD – INDUSTRIAL BOILERS

NESHAP Subpart DDDD was vacated by the Court of Appeals for the District of Columbia on June 8, 2007. A new MACT was proposed on April 29, 2010 and once the new standards are finalized the Department will incorporate the applicable portions of the rule into CPSI’s Title V permit.

## VII. PREVIOUS PERMIT CONDITIONS

Table 4 compares the conditions in Permit No. M170424P1-99 with the conditions in the new permit and cross-references the previous permit conditions to their location in the new permit

**Table 4: Comparison of Previous and Current Permit Conditions**

| Condition # in Permit # M170424P1-99 | Determination |      |        |            | Comments  |
|--------------------------------------|---------------|------|--------|------------|---|
|                                      | Delete        | Kept | Revise | Streamline |   |
| Attachment A                         |               |      | X      |            | This Attachment has been revised and the most recent Attachment “A” is used for this permit.                                |
| Attachment B                         |               |      |        |            |   |
| Condition I.A                        |               | X    |        |            | This condition to require a certified Method 9 observer has been retained.  |
| Condition I.B                        |               | X    |        |            | This fuel standard has been retained.   |
| Condition I.C.1                      | X             |      |        |            | This condition to require recordkeeping of paper production has been deleted because there is no limit on paper production. |
| Condition I.C.2                      | X             |      |        |            | This storage tank requirement is no longer applicable to the facility because NSPS Subpart Kb has been amended.             |
| Condition I.C.3                      |               | X    |        |            | This requirement to keep fuel supplier certifications has been retained.  |

| Condition # in Permit #<br>M170424P1-99 | Determination |      |        |            | Comments   |
|---|---------------|------|--------|------------|--|
|   | Delete        | Kept | Revise | Streamline |  |
| Condition I.D                           |               | X    |        |            | This reporting requirement has been retained.  |
| Condition II.A.1                        |               | X    |        |            | This fuel limitation has been retained.  |
| Condition II.A.2.a                      | X             |      |        |            | This fuel recordkeeping requirement has been deleted because there is no permit limit on fuel usage.   |
| Condition II.A.2.b                      | X             |      |        |            | This fuel monitoring requirement has been deleted because there is no permit limit on fuel usage.  |
| Condition II.B.1.a                      |               | X    |        |            | This PM standard has been retained.  |
| Condition II.B.1.b                      |               |      | X      |            | This opacity limit has been lowered to 20% in A.A.C. R18-2-702.  |
| Condition II.B.2                        |               |      | X      |            | This bi-weekly opacity observation requirement has been revised to include quarterly observations during periods of natural gas usage.                             |
| Condition II.B.3.a                      | X             |      |        |            | This annual opacity performance test requirement has been removed because the permit requires opacity surveys.   |
| Condition II.B.3.b                      | X             |      |        |            | This one time PM performance test requirement has been removed since the PM permit limit can not be violated and the emissions of this unit will be below 100 tpy. |
| Condition II.C.1.a                      |               | X    |        |            | This SO <sub>2</sub> limit has been retained.  |
| Condition II.C.2.a                      |               | X    |        |            | This fuel recordkeeping requirement has been retained.   |
| Condition II.D.1.a                      |               | X    |        |            | This requirement to calculate NO <sub>x</sub> emissions has been retained.   |
| Condition II.D.1.b                      |               | X    |        |            | This requirement to record NO <sub>x</sub> emissions has been retained.  |
| Condition II.D.2                        |               | X    |        |            | This NO <sub>x</sub> testing requirement has been retained.  |
| Condition III.A.1                       |               | X    |        |            | This fuel limitation has been retained.  |
| Condition III.A.2                       | X             |      |        |            | This fuel limitation has been removed because limiting the use of fuel oil #2 does not lower emissions since coal is the other fuel used.                          |
| Condition III.A.3                       |               | X    |        |            | This fuel limitation has been retained.  |

| Condition # in Permit #<br>M170424P1-99 | Determination |      |        |            | Comments  |
|---|---------------|------|--------|------------|---|
|   | Delete        | Kept | Revise | Streamline |   |
| Condition III.A.4                       |               | X    |        |            | This fuel limitation has been retained.   |
| Condition III.A.5                       |               | X    |        |            | This fuel limitation has been retained.   |
| Condition III.B.1.a                     |               |      | X      |            | This PM standard has been revised to include periods of natural gas usage.  |
| Condition III.B.1.b                     |               |      | X      |            | This PM standard has been revised to include periods of natural gas usage.  |
| Condition III.B.2                       |               | X    |        |            | This control equipment requirement has been retained.   |
| Condition III.B.3.a.                    |               | X    |        |            | These COMS requirements have been retained.   |
| Condition III.B.4.a                     |               | X    |        |            | This PM test requirement has been retained.   |
| Condition III.B.4.b                     | X             |      |        |            | This opacity test requirement has been removed because there is a COMS.   |
| Condition III.C.1.a                     |               | X    |        |            | This SO <sub>2</sub> limit has been retained.   |
| Condition III.C.1.b                     |               | X    |        |            | This SO <sub>2</sub> limit has been retained.   |
| Condition III.C.1.c                     | X             |      |        |            | This SO <sub>2</sub> limit equation has been removed because it is unnecessary. The equation was to prorate the emission limit based on which fuel was being fired but both fuels have the same emission limit. |
| Condition III.C.2                       |               | X    |        |            | This control equipment requirement has been retained.   |
| Condition III.C.3.a                     |               | X    |        |            | This CEMS requirement has been retained.  |
| Condition III.C.3.b                     |               | X    |        |            | These CEMS requirements have been retained.   |
| Condition III.C.3.c                     |               | X    |        |            | This reporting requirement has been retained.   |
| Condition III.C.4                       |               | X    |        |            | This SO <sub>2</sub> testing requirement has been retained.   |
| Condition III.D.1                       |               | X    |        |            | These NO <sub>x</sub> limitations have been retained.   |
| Condition III.D.2                       |               | X    |        |            | This NO <sub>x</sub> testing requirement has been retained.   |
| Condition IV.A.1                        |               | X    |        |            | This fuel requirement has been retained.  |



| Condition # in Permit #<br>M170424P1-99 | Determination |      |        |            | Comments   |
|---|---------------|------|--------|------------|--|
|   | Delete        | Kept | Revise | Streamline |  |
| Condition IV.A.2                        |               | X    |        |            | These fuel requirements have been retained.  |
| Condition IV.B.1                        |               |      | X      |            | These opacity standards have been revised to include periods of natural gas usage.   |
| Condition IV.B.2.a                      | X             |      |        |            | The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.  |
| Condition IV.B.2.b                      | X             |      |        |            | The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.  |
| Condition IV.B.3                        | X             |      |        |            | The COMS is being removed and the opacity testing schedule in NSPS Subpart Db will be followed.  |
| Condition IV.C.1                        |               | X    |        |            | This NO <sub>x</sub> emission limitation has been retained.  |
| Condition IV.C.2                        |               | X    |        |            | This control equipment requirement has been retained.  |
| Condition IV.C.3.a                      |               | X    |        |            | These NO <sub>x</sub> CEMS requirements have been retained.  |
| Condition V                             |               | X    |        |            | These CMS requirements have been retained.   |
| Condition VI.A.1.a                      |               | X    |        |            | This PM standard has been retained.  |
| Condition VI.A.1.b                      |               |      | X      |            | This opacity standard has been revised from 40% to 20%.  |
| Condition VI.A.2                        |               | X    |        |            | This control equipment requirement has been retained.  |
| Condition VI.A.3                        |               | X    |        |            | These monitoring and recordkeeping requirements have been retained.  |
| Condition VII                           |               |      | X      |            | These requirements for unclassified sources have been retained with the exception of a revision to the opacity standard from 40% to 20%. |
| Condition VIII                          |               |      | X      |            | These general standards for non point sources have been updated.   |
| Condition IX                            |               |      | X      |            | These general standards for other periodic activities have been updated.   |

## VIII. MONITORING AND RECORDKEEPING REQUIREMENTS

### A. Facility Wide

1. Along with the semiannual compliance certification, the Permittee is required to submit reports of all recordkeeping and monitoring required by the permit.

2. The Permittee is required to maintain, on-site, records of the manufacturer's specifications or an Operation and Maintenance Plan for all equipment listed in the permit
3. The Permittee is required to maintain fuel supplier certifications to demonstrate that any fuel oil #2 used in permitted equipment has a sulfur content no greater than 0.05% by weight.

**B. Power Boiler #1**

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section II by having a Method 9 certified observer perform bi-weekly surveys of visible emission from Power Boiler #1 when firing fuel oil #2 and quarterly when firing natural gas. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard or baseline opacity level.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to keep records of any change to the baseline opacity level.
5. The Permittee is required to keep records of the total NO<sub>x</sub> emitted to the atmosphere from Power Boiler #1 during each calendar year.

**C. Power Boiler #2**

1. The Permittee is required to keep a record of the rolling 12-month total of on-specification used oil combusted in Power Boiler #2.
2. The Permittee is required to keep records of the analyses performed on the used oil to demonstrate that the oil meets the definition of on-specification used oil.
3. The Permittee is required to show compliance with the opacity standard in Attachment "B", Section III by operating a COMS and recording the output.
4. The Permittee is required to keep records of the COMS performance reports and excess emission reports.
5. The Permittee is required to show compliance with the SO<sub>2</sub> standard in Attachment "B", Section III by operating SO<sub>2</sub> and O<sub>2</sub> CEMS and recording the output.
6. The Permittee is required to keep a record of the information used to convert the CEMS data into units of lb/MMBtu.
7. The Permittee is required to maintain a record of all SO<sub>2</sub> excess emissions from Power Boiler #2. Excess emissions for SO<sub>2</sub> are any three-hour period during which the average emission is greater 0.8 lbs/MMBtu.
8. The Permittee is required to keep records of the CEMS performance reports.

**D. Power Boiler #3**

1. The Permittee is required to maintain fuel receipts from the fuel supplier.
2. The Permittee is required to maintain a record of the amount and type of fuel combusted each day.
3. The Permittee is required to maintain individual 12-month rolling averages of the annual capacity factors for natural gas and distillate oil.
4. The Permittee is required to show compliance with the opacity standard in Attachment "B", Section IV by following an opacity testing schedule from NSPS Subpart Db.
5. The Permittee is required to maintain a record of all opacity excess emissions from Power Boiler #3. Excess emissions for opacity are any six-minute period during which the average opacity is greater than 20% except for one six-minute period per hour of 27%.
6. The Permittee is required to show compliance with the NO<sub>x</sub> standards in Attachment "B", Section IV by operating a CEMS and maintaining a record of the output.
7. The Permittee is required to keep a record of the information used to convert the CEMS data into units of lb/MMBtu.
8. The Permittee is required to maintain a record of all NO<sub>x</sub> excess emissions from Power Boiler #3. Excess emissions for NO<sub>x</sub> are any 30-day period during which the average emission is greater 0.2 lbs/MMBtu.

**E. Continuous Monitoring Systems (CMS)**

1. The Permittee is required to maintain records of any period during which a CMS is inoperative.
2. The Permittee is required to maintain a file of all measurements including, continuous monitoring system, monitoring device, all continuous system performance evaluations, all continuous monitoring systems calibration checks, adjustments or maintenance performed on these systems or devices recorded in a permanent form suitable for inspection.

**F. Coal Handling Facility**

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VI by having a Method 9 certified observer perform a bi-weekly survey of visible emission from the coal handling facility. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 20%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

## **G. Internal Combustion Engines**

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VII by having a Method 9 certified observer perform a quarterly survey of visible emission from the engines. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 40%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to keep records of maintenance performed on the engines and the hours of operation.
5. The Permittee is required to keep records of engine malfunctions.
6. The Permittee is required to operate and maintain the engines in accordance with manufacturer's emission-related written instructions or develop and follow a maintenance plan.

## **H. Unclassified Equipment**

1. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section VI by having a Method 9 certified observer perform a monthly survey of visible emission from the soda ash silo. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed 20%.
2. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
3. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.
4. The Permittee is required to maintain a record of maintenance performed on the soda ash silo baghouse

## **I. Gasoline Storage Tank**

1. The Permittee is required to maintain records of the Reid pressure of the gasoline, dates of storage in the tank, and dates when the tank is empty.
2. The Permittee is required to maintain a record of average storage temperature and true vapor pressure of the gasoline.

## **J. Fugitive Dust**

1. The Permittee is required to keep record of the dates on which any of the dust control measures contained in Attachment "B", Conditions XI.B.1.a.(3)(a) through XI.B.1.a.(3)(h) are employed.

2. The Permittee is required to show compliance with the opacity standards in Attachment "B", Section XI by having a Method 9 certified observer perform a monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.
3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.
4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

**G. Mobile Sources**

The Permittee is required to keep records of all emission related maintenance performed on the mobile sources.

**H. Periodic Activities**

1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
2. The Permittee is required to record the date, duration, and quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

**IX COMPLIANCE ASSURANCE MONITORING FOR POWER BOILER # 2:**

**A. Particulate Matter**

1. Background

a. Emission Unit

Description: Coal-Fired Power Boiler

Unit Identification: Power Boiler #2

Air Pollution Control ID: ESP 1 and ESP 2

Facility: Catalyst Paper Mill

b. Applicable Regulation, Emissions Limit, and Monitoring Requirements

Regulation: A.A.C. R18-2-901.2 (40 CFR 60, Subpart D)

Emission Limit: PM < 0.1 lb/MMBtu

Monitoring Requirements: COMS

c. Control Technology Hot-Side Electrostatic Precipitators

2. Monitoring Approach

The monitoring approach relies on the use of two indicators of ESP performance. One indicator is opacity. The second indicator is the secondary voltage and secondary current across each section of the ESP.

Opacity is an indicator of PM emissions. Historic particulate emissions test data and concurrent opacity monitoring data indicates that compliance with the applicable 20% opacity limit provides a significant margin for demonstrating continuous compliance with the applicable 0.1 lb/MMBtu PM limit. Based on historic PM testing results it was decided to set the opacity indicator range as 1 hour average opacity of less than 18% as recorded by the COMS.

The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP. The electrical parameters will be monitored on a continuous basis (at least once every 15 minutes), and a rolling 3-hour average will be recorded. In addition, if the 1 hour average opacity equals or exceeds 18% the unit operation status (load change increase or decrease) will be recorded.

All indicator ranges exclude periods of startup and shutdown.

If the 1-hour average opacity equals or exceeds 18%, and the electrical parameters are also outside the established 3-hour range, an excursion event will be recorded and reported. Corrective action will be taken to return all indicators to within their respective ranges.

3. Monitoring Approach Justification

Opacity was selected as the primary performance indicator because, as the opacity of emissions increases, it can be reasonably assumed that PM emissions increase. In addition, the facility has historically been required by permit to conduct annual PM testing, and past data indicates that the unit opacity limits provide a significant margin of compliance with the PM limits.

Electrical parameters (secondary current and voltage for each section of each ESP) were selected because they influence collection efficiency. If electrical parameters are outside their normal ranges, it can be assumed that ESP collection efficiency is not at optimum levels. The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP. The Permittee may periodically develop new parameters for different coal supplies, coal blends, or operating conditions. These will be submitted to ADEQ and EPA for approval 60 days prior to utilization.

**CAM Plan for ESP**

|  |  |
|--|--|
| Indicator and its measurement approach | Opacity from the stack shall be the primary indicator and continuous opacity monitoring systems (COMS) will be used as the measurement approach. The secondary indicator will be the electrical parameters (current and voltage) for each section of each ESP. |
|--|--|

|  |   |
|--|---|
| Indicator Range  | The indicator range for opacity will be over a 1-hour rolling average of less than 18% opacity. The range for one of the ESP electrical parameters will be identified within 90 days of permit issuance and the Permittee shall have an additional 90 days to identify the parameters for the other ESP.  |
| Data representativeness  | The data will represent normal operating conditions. This will exclude startup, shutdown, and malfunctions.   |
| Verification of operational status                                 | N/A   |
| Quality assurance / quality control (QA/QC) practices and criteria | CPSI is required by the permit to meet the QA/QC requirements of 40 CFR 60, Appendix B, Performance Specification 1, "Specification and Test Procedures for Opacity Continuous Emission Monitoring Systems in Stationary Sources"   |
| Monitoring Frequency   | The COMS shall be in continuous operation and shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period. The source will also monitor the electrical parameters on a continuous basis (at least once every 15 minutes) for each section of each ESP and record a rolling 3-hour average. |
| Data Collection Procedure  | CPSI will reduce all data from the COMS to 6-minute averages. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each 6-minute period.   |
| Averaging period   | CPSI will be required to monitor the opacity over a 1-hour averaging period and the ESP data over a 3-hour period.  |

**B. Sulfur Dioxide**

The source is subject to the SO<sub>2</sub> standard of 0.8 lb/MMBtu in A.A.C. R18-2-903.1 while burning coal and the 0.8 lb/MMBtu standard of NSPS Subpart D while burning oil. Compliance test results indicate that the unit is able to meet the standard. The Permittee is required to operate a CEMS to demonstrate compliance with the emission limit and therefore CAM is not an applicable requirement. The monitoring system is required to meet the requirements of 40 CFR 60.13 and 40 CFR 60 Appendices B and F.

**X. Testing Requirements**

- A.** The Permittee is required to perform a Method 7 performance test for NO<sub>x</sub> on Power Boiler #1 in the year following any year that the boiler exceeds 100 tons of NO<sub>x</sub> emission.
- B.** The Permittee is required to perform a Method 6 performance test for SO<sub>2</sub> on Power Boiler #1 in the year following any year that the boiler exceeds 100 tons of SO<sub>2</sub> emission.
- C.** The Permittee is required to conduct an annual Method 5 test for PM on Power Boiler #2.
- D.** The Permittee is required to conduct an annual Method 7 test for NO<sub>x</sub> on Power Boiler #2.

## XI. Insignificant Activities

The Permittee has requested that the following activities be deemed as insignificant. According to A.A.C. R18-2-101.57 an activity is insignificant only if there are no applicable requirements for the activity. This was the basis used to determine if the activities in the following table qualify as an insignificant activity under Arizona law.

**Table 5 –Activities Proposed as Insignificant by Permittee**

| S. No.             | ACTIVITY  | Category                   | Equipment # | Yes/No | Reason  |
|--------------------|---|----------------------------|-------------|--------|---|
| 1                  | Natural gas combustion sources which provide comfort heat.                            | Mill General               | N/A         | No     | A.A.C. R18-2-724  |
| 2SN-MNT1-F001      | Pulp Mill Maintenance Area  | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 3SN-MNT1-F002      | Main Maintenance Shop   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 4SN-MNT1-F003      | Pump Shop   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 5SN-MNT1-F004      | Power House Maintenance Shop  | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 6SN-MNT1-F005      | Roll Grinding room  | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 7SN-MNT1-F006      | Machine Room Maintenance Shop   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 8SN-MNT1-F008      | Bag Plant Building  | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 9SN-MNT1-F009      | Instrument Shop   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.a  |
| 10SN-MNT1-F010     | Technical Lab   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.i  |
| 11SN-MNT1-S007     | Technical Lab   | Mill General               | N/A         | Yes    | A.A.C.R18-2-101.57.i  |
| 12SN-MNT1-T011     | Diesel Fuel Tank – 10,000 gallons   | Petroleum Storage Area     | 732-1014    | Yes    | A.A.C.R18-2-101.57.c<br>Diesel storage tanks with capacity of 40,000 gallons or less.   |
| 13SN-MNT1-T012     | Gasoline Fuel Tank – 4,000 gallons  | Petroleum Storage Area 732 | 732-1015    | No     | A.A.C. R18-2-710  |
| 14SN-PAM1-M001     | No. 1 News Blend Chest  | #1 Paper Machine, Area 252 | 252-1034    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors. |
| 15SN-PAM1-M002     | No. 1 News machine Chest (contains water and paper fiber solution, no exterior vents) | #1 Paper Machine, Area 252 | 252-2724    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors. |
| 16<br>SN-PAM1-M003 | No. 1 News Broke Chest  | #1 Paper Machine, Area 252 | 252-1069    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors. |
| 16A                | 20 Ton News Broke Chest   | #1 Paper Machine, Area 252 | 252-1050    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. It is also located inside a building with no vents to exteriors. |



| S. No. | ACTIVITY                          | Category                   | Equipment # | Yes/No | Reason  |
|--------|-----------------------------------|----------------------------|-------------|--------|---|
| 16B    | Off Machine Silo Tank             | #1 Paper Machine, Area 252 | 252-0014    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16C    | Flat Box Seal Tank                | #1 Paper Machine, Area 252 | 252-0064    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16D    | Primary Screen Rejects Standpipe  | #1 Paper Machine, Area 252 | 252-1030    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16G    | Deulator Receiver Tank            | #1 Paper Machine, Area 252 | 252-1080    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution to be recycled back into the process. |
| 16H    | Primary Rejects Tank              | #1 Paper Machine, Area 252 | 252-1030    | Yes    | A.A.C.R18-2-101.57.j<br>Contains fine contaminants from the water and paper fiber solution.           |
| 16I    | Tertiary Rejects Tank             | #1 Paper Machine, Area 252 | 252-1086    | Yes    | A.A.C.R18-2-101.57.j<br>Contains fine contaminants from the water and paper fiber solution.           |
| 16J    | Couch Pit Tank                    | #1 Paper Machine, Area 252 | 252-1137    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16K    | Wire Pit                          | #1 Paper Machine, Area 252 | 252-1060    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16L    | Seal Pit Tank                     | #1 Paper Machine, Area 252 | 252-1180    | Yes    | A.A.C.R18-2-101.57.j  |
| 16M    | Seal Pit Tank                     | #1 Paper Machine, Area 252 | 252-1181    | Yes    | A.A.C.R18-2-101.57.j  |
| 16N    | Water Loading Tank Assemblies     | #1 Paper Machine, Area 252 | 252-1216    | Yes    | A.A.C.R18-2-101.57.j  |
| 16O    | Uhle Box Seal Pit Tank            | #1 Paper Machine, Area 252 | 252-1228    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16P    | Press Pit Tank                    | #1 Paper Machine, Area 252 | 252-1270    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                                      |
| 16Q    | Air Receiver                      | #1 Paper Machine, Area 252 | 252-1332    | Yes    | A.A.C.R18-2-101.57.j<br>Contains compressed ambient air.  |
| 16R    | Condensate System Vacuum Receiver | #1 Paper Machine, Area 252 | 252-1461    | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate from the steam going to the dryers.                       |
| 16S    | 1 <sup>st</sup> Section Separator | #1 Paper Machine, Area 252 | 252-1462    | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate from the steam going to the dryers.                       |
| 16T    | 2 <sup>nd</sup> Section Separator | #1 Paper Machine, Area 252 | 252-1463    | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate from the steam going to the dryers.                       |

| S. No.         | ACTIVITY                          | Category                   | Equipment #  | Yes/No | Reason  |
|----------------|-----------------------------------|----------------------------|--|--------|---|
| 16U            | 3 <sup>rd</sup> Section Separator | #1 Paper Machine, Area 252 | 252-1464   | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate from the steam going to the dryers.                     |
| 16V            | Vacuum Seal Tank                  | #1 Paper Machine, Area 252 | 252-2010   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water to maintain seal on the vacuum system.                       |
| 17SN-PAM1-S004 | No. 1 False Ceiling Exhaust       | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 18SN-PAM1-S005 | No. 1 False Ceiling Exhaust       | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 19SN-PAM1-S006 | No. 1 PM Roof Exhaust Fan         | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 20SN-PAM1-S007 | PM No. 1 Roof Exhaust Fan         | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 21SN-PAM1-S008 | PM No. 1 Roof Exhaust Fan         | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 22SN-PAM1-S009 | No. 1 PM Dryer Hood Exhaust       | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 23SN-PAM1-S010 | No. 1 PM Dryer Hood Exhaust       | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 24SN-PAM1-S011 | No. 1 PM Dryer Hood Exhaust       | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 25SN-PAM1-S013 | No. 1 PM Steam System Relief      | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 26SN-PAM1-S014 | PM No. 1 Steam System Relief      | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 27SN-PAM1-S015 | Vacuum Pump Exhaust PM 1 Set 2    | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 28SN-PAM1-S016 | PM 1&2 Vacuum Pump Exhaust        | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 29SN-PAM1-V012 | No. 1 PM Steam System Relief      | #1 Paper Machine, Area 252 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 29 A           | Vacuum Pumps                      | #1 Paper Machine, Area 252 | 252-0051<br>252-0052<br>252-0053<br>252-0054<br>252-0055<br>252-0056<br>252-0057<br>252-1305<br>252-2610 | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 1 Paper Machine paper Giver Solution.      |
| 29 B           | Dry End Pulper                    | #1 Paper Machine Area 252  | 252-0119   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents |
| 29 C           | Save-all                          | #1 Paper Machine Area 252  | 252-1076   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents |
| 29 D           | Deculator                         | #1 Paper Machine Area 252  | 252-1076   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents |

| S. No.             | ACTIVITY              | Category                  | Equipment #                      | Yes/No | Reason  |
|--------------------|-----------------------|---------------------------|----------------------------------|--------|---|
| 29E                | Primary Cleaners(22)  | #1 Paper Machine Area 252 | 252-1026<br>252-1027<br>252-1028 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents   |
| 29 F               | Secondary Cleaners(4) | #1 Paper Machine Area 252 | 252-1046                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents   |
| 29 G               | Tertiary Cleaners(2)  | #1 Paper Machine Area 252 | 252-1047                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents   |
| 29 H               | Quaternary Cleaners   | #1 Paper Machine Area 252 | 252-1048                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents   |
| 29 I               | Quinary Cleaners      | #1 Paper Machine Area 252 | 252-1049                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and Paper fiber solution, inside building, no exterior vents   |
| 29J                | Bel Bond              | #1 Paper Machine Area 252 | 252-1050                         | Yes    | A.A.C.R18-2-101.57.j<br>Forming Section of paper machine, paper fiber solution is sprayed on wire mesh and water is drawn off.                  |
| 29 K               | Vacuum Pit            | #1 Paper Machine Area 252 | 252-1325                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water vapor from paper fiber solution.   |
| 29 L               | Press                 | #1 Paper Machine Area 252 | 252-1400                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is pressed and heated to reduce moisture and help formation. Water vapor from the paper fiber solution. |
| 29 M               | Second Dryer Section  | #1 Paper Machine Area 252 | 252-1407                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.                                |
| 29 N               | Third Dryer Section   | #1 Paper Machine Area 252 | 252-1413                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.                                |
| 29O                | Fourth Dryer Section  | #1 Paper Machine Area 252 | 252-1423                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture. Water vapor from the paper fiber solution.                                |
| 29 P               | Winder                | #1 Paper Machine Area 252 | 252-1600                         | Yes    | A.A.C.R18-2-101.57.j<br>Rewinds paper from reel to individual roles.  |
| 30<br>SN-PAM2-M016 | Kraft Machine Chest   | #2 Paper Machine Area 242 | 242-1001                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Fiber Solution.  |

| S. No.             | ACTIVITY                       | Category                        | Equipment #  | Yes/No | Reason   |
|--------------------|--------------------------------|---------------------------------|--|--------|--|
| 30 A               | Couch Pit Tank                 | #2 Paper Machine Area 242       | 252-2554   | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Fiber Solution.                                     |
| 30 B               | Wire Pit tank                  | #2 Paper Machine Area 242       | 252-2564   | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Fiber Solution.                                     |
| 32<br>SN-PAM2-M018 | 40 Ton Kraft Broke Chest       | #2 Paper Machine, Area 242      | 242-3106   | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Fiber Solution.                                     |
| 33<br>SN-PAM2-M021 | Primary Headbox Surge Tank     | #2 Paper Machine, Area 242      | 242-2518   | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Fiber Solution.                                     |
| 35<br>SN-PAM2-M023 | Kraft Vacuum Seal Box          | #2 Paper Machine, Area 242      | 242-2136   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 2 paper machine paper fiber solution. |
| 36<br>SN-PAM2-M024 | Kraft Primary Silo             | #2 Paper Machine, Area 242      | 242-2583   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 2 paper machine paper fiber solution. |
| 37 A               | Secondary Silo Tank            | #2 Paper Machine, Area 242      | 242-2587   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper solution.                                     |
| 39<br>SN-PAM2-M027 | Broke Chest                    | #2 Paper Machine, Area 242      | 242-0122   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper solution.                                     |
| 40<br>SN-PAM2-M028 | Saveall Cloudy Water Seal Tank | Corrugated Waste Area, Area 193 | 193-2170   | Yes    | A.A.C.R18-2-101.57.j   |
| 41<br>SN-PAM2-M029 | Saveall Cloudy Water Seal Tank | Corrugated Waste Area, Area 193 | 193-2170   | Yes    | A.A.C.R18-2-101.57.j   |
| 42<br>SN-PAM2-M030 | White Water Collection Tank    | #2 Paper Machine, Area 242      | 242-4026   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                               |
| 46<br>SN-PAM2-M036 | Fresh Water Showers Tank       | #2 Paper Machine, Area 242      | 242-3102   | Yes    | A.A.C.R18-2-101.57.j   |
| 46 A               | Dryer Lube Oil Tank            | #2 Paper Machine, Area 242      | 242-3350   | Yes    | A.A.C.R18-2-101.57.c<br>It is less than 10,000 gallons.  |
| 47<br>SN-PAM2-M037 | Seal Tank Separator            | #2 Paper Machine, Area 242      | 242-3371<br>242-3372<br>242-3373<br>242-3374<br>242-3375<br>242-3376 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.                               |
| 47 A               | Vacuum Separator Tank          | #2 Paper Machine, Area 242      | 242-2752   | Yes    | A.A.C.R18-2-101.57.j   |
| 48<br>SN-PAM2-M038 | Condensate Flash Tank          | #2 Paper Machine, Area 242      | 242-2785   | Yes    | A.A.C.R18-2-101.57.j<br>Contains steam condensate in a sealed tank with no vents.              |
| 49SN-PAM2-M039     | Primary Settling Tank          | Petroleum Storage, Area 752     | 752-1050   | Yes    | A.A.C.R18-2-101.57.j   |
| 50SN-PAM2-M040     | Lube Oil Tank                  | Petroleum Storage, Area 752     | 752-1053   | Yes    | A.A.C.R18-2-101.57.j   |
| 50 B               | Primary Settling Tank          | Petroleum Storage, Area 752     | 242-0589   | Yes    | A.A.C.R18-2-101.57.j   |
| 50 C               | Pump Tank                      | Petroleum Storage, Area 752     | 242-0590   | Yes    | A.A.C.R18-2-101.57.j<br>Roll grind cooling water   |

| S. No.             | ACTIVITY                     | Category                    | Equipment #  | Yes/No | Reason  |
|--------------------|------------------------------|-----------------------------|--|--------|---|
| 50 D               | Way Lube                     | Petroleum Storage, Area 752 | 752-0595   | Yes    | A.A.C.R18-2-101.57.j  |
| 50 E               | Petroleum Storage            | Petroleum Storage, Area 752 | 752-1034   | Yes    | A.A.C.R18-2-101.57.j  |
| 51<br>SN-PAM2-S015 | Dry End Area Exhaust         | #2 Paper Machine, area 242  | -  | Yes    | A.A.C.R18-2-101.57.j  |
| 51 A               | Primary Screen               | #2 Paper Machine, Area 242  | 242-2505   | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and paper fiber solution.  |
| 51 B               | Primary Head Box             | #2 Paper Machine, Area 242  | 242-2530   | Yes    | A.A.C.R18-2-101.57.j<br>Forming Section of the Paper Machine, Paper fiber is sprayed on a wire mesh and water is drawn off. |
| 51 C               | Vacuum Pump (7)              | #2 Paper Machine, Area 242  | 242-2668<br>242-2669<br>242-2670<br>242-2671<br>242-2650<br>242-2733<br>242-2750 | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 2 paper machine.   |
| 51 D               | Fourdiner                    | #2 Paper Machine, Area 242  | 242-2626   | Yes    | A.A.C.R18-2-101.57.j<br>Forming section of paper machine, paper solution is sprayed on a wire mesh and water is drawn off.  |
| 51 E               | First Press                  | #2 Paper Machine, Area 242  | 242-2690   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is pressed and heated to reduce moisture.   |
| 51 F               | Second Press                 | #2 Paper Machine, Area 242  | 242-2701   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is pressed and heated to reduce moisture.   |
| 51 G               | Third Press                  | #2 Paper Machine, Area 242  | 242-2725   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is pressed and heated to reduce moisture.   |
| 51 H               | First Dryer Section(1-5)     | #2 Paper Machine, Area 242  | 242-2761   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |
| 51 I               | Second Dryer Section(6-19)   | #2 Paper Machine, Area 242  | 242-2791   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |
| 51 J               | Third Dryer Section (20-35)  | #2 Paper Machine, Area 242  | 242-2821   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |
| 51 K               | Fourth Dryer Section (36-48) | #2 Paper Machine, Area 242  | 242-2840   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |
| 51 L               | Fifth Dryer Section (37-47)  | #2 Paper Machine, Area 242  | 242-2840   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |
| 51 M               | Sixth Dryer Section (37-47)  | #2 Paper Machine, Area 242  | 242-2840   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.   |

| S. No.             | ACTIVITY                         | Category                          | Equipment # | Yes/No | Reason   |
|--------------------|----------------------------------|-----------------------------------|-------------|--------|--|
| 51 N               | Winder                           | #2 Paper Machine, Area 242        | 242-3000    | Yes    | A.A.C.R18-2-101.57.j<br>Rewinds paper from reel to individual rolls. There are no emissions. |
| 52SN-PAM3-M001     | No. 3 News Blend Chest           | # 3 Paper Machine area, Area 262  | 262-0097    | Yes    | A.A.C.R18-2-101.57.j,<br>Contains only paper fiber and water solution.                       |
| 53SN-PAM3-M002     | No. 3 News Machine Chest         | # 3 Paper Machine area, Area 262  | 262-0107    | Yes    | A.A.C.R18-2-101.57.j,<br>Contains only paper fiber and water solution.                       |
| 54SN-PAM3-M003     | No. 3 News Saveall Chest         | # 3 Paper Machine area, Area 262  | 262-0042    | Yes    | A.A.C.R18-2-101.57.j,<br>Contains only paper fiber and water solution.                       |
| 54 A               | Felt Wash Bulk Storage, Tank #1  | # 3 Paper Machine area, Area 262  | 262-0057    | Yes    | A.A.C.R18-2-101.57.j   |
| 54 B               | Felt Wash Bulk Storage, Tank #1  | # 3 Paper Machine area, Area 262  | 262-0058    | Yes    | A.A.C.R18-2-101.57.j   |
| 54 C               | Main Lube System Tank            | # 3 Paper Machine area, Area 262  | 262-0481    | Yes    | A.A.C.R18-2-101.57.j   |
| 54 D               | Felt Wash Mix, Tank #1           | # 3 Paper Machine area, Area 262  | 262-0181    | Yes    | A.A.C.R18-2-101.57.j   |
| 55SN-PAM3-S004     | No. 3 PM Wet End Area Exhaust    | # 3 Paper Machine area, Area 262  | -           | Yes    | A.A.C.R18-2-101.57.j   |
| 56SN-PAM3-S005     | No. 3 PM Wet End Area Exhaust    | # 3 Paper Machine area, Area 262- | -           | Yes    | A.A.C.R18-2-101.57.j   |
| 57SN-PAM3-S006     | No. 3 PM Press Sec. Area Exhaust | # 3 Paper Machine area, Area 262  | -           | Yes    | A.A.C.R18-2-101.57.j   |
| 58SN-PAM3-S007     | No. 3 PM Press Sec. Area Exhaust | # 3 Paper Machine area, Area 262  | -           | Yes    | A.A.C.R18-2-101.57.j   |
| 59SN-PAM3-S008     | No. 3 PM Dry End Area Exhaust    | # 3 Paper Machine area, Area 262  | -           | Yes    | A.A.C.R18-2-101.57.j   |
| 60SN-PAM3-S009     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 61SN-PAM3-S010     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 62SN-PAM3-S011     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 63SN-PAM3-S012     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 64SN-PAM3-S013     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 65SN-PAM3-S015     | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 66<br>SN-PAM3-S016 | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 67<br>SN-PAM3-S017 | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 68<br>SN-PAM3-S018 | No. 3 PM Dry End Exhaust         | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 69<br>SN-PAM3-S019 | No. 3 PM Area Roof Exhaust       | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 70<br>SN-PAM3-S021 | No. 3 PM Dry End Exhaust         | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 71<br>SN-PAM3-S022 | No. 3 PM Dry End Exhaust         | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |
| 72<br>SN-PAM3-S023 | No. 3 PM Roof Access Door        | # 3 Paper Machine area, Area 262  |             | Yes    | A.A.C.R18-2-101.57.j   |

| S. No.             | ACTIVITY                                      | Category                         | Equipment # | Yes/No | Reason  |
|--------------------|---|----------------------------------|-------------|--------|---|
| 73<br>SN-PAM3-S024 | No.3 PM Vacuum Pump Exhaust                   | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 74<br>SN-PAM3-V014 | No. 3 PM Area Roof Exhaust                    | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 75<br>SN-PAM3-V020 | No. 3 PM Dry End Exhaust                      | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 76<br>SN-PAM3-V025 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 77<br>SN-PAM3-V026 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 78<br>SN-PAM3-V027 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 79<br>SN-PAM3-V028 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 80<br>SN-PAM3-V029 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 81<br>SN-PAM3-V030 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 82<br>SN-PAM3-V031 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 83<br>SN-PAM3-V032 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 84<br>SN-PAM3-V033 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 85<br>SN-PAM3-V034 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 86<br>SN-PAM3-V035 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 87<br>SN-PAM3-V036 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 88<br>SN-PAM3-V037 | No. 3 Pm Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 89<br>SN-PAM3-V038 | No. 3 PM Steam System Relief                  | # 3 Paper Machine area, Area 262 |             | Yes    | A.A.C.R18-2-101.57.j  |
| 91<br>SN-PAM4-M003 | Low Density Chest                             |                                  |             | Yes    | A.A.C.R18-2-101.57.j<br>Contains Water and Paper Fiber Solution.              |
| 93<br>SN-PAM4-M005 | #3 Deinking 400 ton high density storage tank | #3 Deinking, Area 194            | 194-0053    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.              |
| 94<br>SN-PAM4-M006 | No. 2 D. I. High Density Stock Chest          | #2 Deinking, Area 192            | 191-2779    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.              |
| 95<br>SN-PAM4-M007 | News Clarified Whitewater Chest               | #1 Paper Machine, Area 252       | 252-1042    | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 1 & 3 paper machine. |
| 96<br>SN-PAM4-M008 | News Water Reclaim Tank                       | #1 Paper Machine, Area 252       | 252-0202    | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from no. 1 & 3 paper machine. |
| 97<br>SN-PAM4-M009 | News Off-Machine Silo                         | #3 Paper Machine, Area 262       | 262-0132    | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 3 Paper machine.     |
| 97 A               | Deculator Receiver                            | #3 Paper Machine, Area 262       | 262-0147    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.              |

| S. No.              | ACTIVITY                        | Category                        | Equipment #  | Yes/No | Reason  |
|---------------------|---------------------------------|---------------------------------|--|--------|---|
| 97 B                | Saveall                         | #3 Paper Machine, Area 262      | 262-0042   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.          |
| 98<br>SN-PAM4-M010  | Deculator White Water Chest     | #1 Paper Machine Area, Area 252 | 252-1039   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 3 Paper machine. |
| 100<br>SN-PAM4-M013 | No. 1 Wet End Additive Tank     | #1 Paper Machine, Area 252      | 252-1347   | Yes    | A.A.C.R18-2-101.57.j  |
| 101<br>SN-PAM4-M014 | No. 2 Wet End Additive Tank     | #1 Paper Machine, Area 252      | 252-1349   | Yes    | A.A.C.R18-2-101.57.j  |
| 102<br>SN-PAM4-M016 | Seal Tank For North Sweat Dryer | #3 Deinking , Area 194          | 292-0370   | Yes    | A.A.C.R18-2-101.57.j<br>Contains steam condensate.                        |
| 103<br>SN-PAM4-M017 | Drainage System Flash Tank      | #3 Paper Machine, Area 262      | 262-0476   | Yes    | A.A.C.R18-2-101.57.j<br>Contains steam condensate.                        |
| 107<br>SN-PAM4-S031 | Cafeteria or Lab Exhaust        |                                 |  | Yes    | A.A.C.R18-2-101.57.i  |
| 108<br>SN-PAM4-T015 | Sulfuric Acid Tank              | #2 Paper Machine, Area 242      | 242-1104 & 1110  | Yes    | A.A.C.R18-2-101.57.j  |
| 109 A               | Primary Cleaners (235)          | #3 Paper Machine, Area 262      | 262-0148   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.          |
| 109 B               | Secondary Cleaners (59)         | #3 Paper Machine, Area 262      | 262-1049   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.          |
| 109 C               | Tertiary Cleaners (26)          | #3 Paper Machine, Area 262      | 262-0150   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.          |
| 109 D               | Quaternary Cleaners (8)         | #3 Paper Machine, Area 262      | 262-0151   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution.          |
| 109 E               | Primary Screens (3)             | #3 Paper Machine, Area 262      | 262-0141<br>262-0142<br>262-0143   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution           |
| 109 F               | Secondary Screens (3)           | #3 Paper Machine, Area 262      | 262-0180   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution           |
| 109 G               | Tertiary Screens (3)            | #3 Paper Machine, Area 262      | 262-0173   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution           |
| 109 H               | Bel Baie Former                 | #3 Paper Machine, Area 262      | 262-0205   | Yes    | A.A.C.R18-2-101.57.j<br>Forming Section of Paper Machine                  |
| 109 I               | Vacuum Pumps                    | #3 Paper Machine, Area 262      | 262-0326<br>262-0327<br>262-0328<br>262-0329<br>262-0330<br>262-0331<br>262-0332<br>262-0333<br>262-0334 | Yes    | A.A.C.R18-2-101.57.j<br>Contain recycled water from No. 3 paper machine.  |
| 109 J               | First Dryer Section (2)         | #3 Paper Machine, Area 262      | 262-0356<br>262-0364   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.     |
| 109 K               | Third Dryer Section             | #3 Paper Machine, Area 262      | 262-0367   | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.     |



| S. No.              | ACTIVITY                               | Category                   | Equipment #                      | Yes/No | Reason  |
|---------------------|--|----------------------------|----------------------------------|--------|---|
| 109 L               | Fourth Dryer Section                   | #3 Paper Machine, Area 262 | 262-0368                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated to reduce moisture.             |
| 109 M               | Press Section                          | #3 Paper Machine, Area 262 | 262-0275                         | Yes    | A.A.C.R18-2-101.57.j<br>The paper sheet is heated and pressed to reduce moisture. |
| 109 N               | Repulper                               | #3 Paper Machine, Area 262 | 262-0500                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and fiber solution.                        |
| 110 A               | Saveall Clear Side Seal Tank Chest     | #3 Paper Machine, Area 262 | 262-0501                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 3 Paper Machine.         |
| 110 B               | Saveall Cloudy Side Seal Tank Chest    | #3 Paper Machine, Area 262 | 262-0502                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 3 Paper Machine.         |
| 110 C               | Saveall Stock Chest                    | #3 Paper Machine, Area 262 | 262-0081                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and fiber solution.                        |
| 110 D               | Wire Pit Tank                          | #3 Paper Machine, Area 262 | 262-0131                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and fiber solution.                        |
| 110 E               | Primary Screen Reject Tanks            | #3 Paper Machine, Area 262 | 262-0143                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains fine rejects from the water and paper solution.  |
| 110 F               | White Water Chest                      | #3 Paper Machine, Area 262 | 262-0071<br>262-0076<br>262-0265 | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from No. 3 paper machine.         |
| 110 G               | Fresh Water Shower Tank                | #3 Paper Machine, Area 262 | 262-0312                         | Yes    | A.A.C.R18-2-101.57.j  |
| 110 H               | Couch Pit Tank                         | #3 Paper Machine, Area 262 | 262-0315                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper solution.                        |
| 110 I               | Press Pit Tank                         | #3 Paper Machine, Area 262 | 262-0304                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper solution.                        |
| 110 J               | Sump Station #1 Tank                   | #3 Paper Machine, Area 262 | 262-0490                         | Yes    | A.A.C.R18-2-101.57.j  |
| 110 K               | #2 Air Compressor Receiver             | #3 Paper Machine, Area 262 | 262-0499                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains compressed ambient air.                          |
| 110 L               | Broughton Oscillator Supply Tank       | #3 Paper Machine, Area 262 | 262-0640                         | Yes    | A.A.C.R18-2-101.57.j  |
| 111<br>SN-PAM4-T020 | Dye System Tank                        | #3 Paper Machine, Area 262 | A6262106-001                     | Yes    | A.A.C.R18-2-101.57.j  |
| 112<br>SN-PAM4-T021 | Dye System Tank                        | #3 Paper Machine, Area 262 | A6262106-002                     | Yes    | A.A.C.R18-2-101.57.j  |
| 114 A               | Dispersion #1 Tank (Talc Mix Tank)     | #3 Paper Machine, Area 262 | 262-2117                         | Yes    | A.A.C.R18-2-101.57.j  |
| 114 B               | Dispersion #2 Tank (Talc Mix Tank)     | #3 Paper Machine, Area 262 | 262-2120                         | Yes    | A.A.C.R18-2-101.57.j  |
| 114 C               | Supply Tank (Talc)                     | #3 Paper Machine, Area 262 | 262-0623                         | Yes    | A.A.C.R18-2-101.57.j  |
| 114 D               | Concentrate Polymer Retention Aid Tank | #3 Paper Machine, Area 262 | 262-2259                         | Yes    | A.A.C.R18-2-101.57.j  |
| 115<br>SN-PAM4-T029 | Rosin Size Storage Tank                | #2 Paper Machine, Area 252 | 252-1835                         | Yes    | A.A.C.R18-2-101.57.j  |

| S. No.              | ACTIVITY  | Category                           | Equipment # | Yes/No | Reason   |
|---------------------|---|------------------------------------|-------------|--------|--|
| 116<br>SN-PAM4-T030 | Emulsified Rosin Storage Tank   | #2 Paper Machine, Area 252         | 252-1835    | Yes    | A.A.C.R18-2-101.57.j   |
| 117<br>SN-PAM4-M002 | Pulper Dump Chest   | Old Corrugated Container Area      | 191-2517    | Yes    | A.A.C.R18-2-101.57.j   |
| 119<br>SN-PRC1-M004 | OCC Decker Filtrate   | Old Corrugated Area, Area 191      | 191-1265    | Yes    | A.A.C.R18-2-101.57.j   |
| 120<br>SN-PRC1-M005 | OCC Decker Filtrate Chest   | Old Corrugated Area, Area 191      | 191-1265    | Yes    | A.A.C.R18-2-101.57.j   |
| 121<br>SN-PRC1-M006 | OCC Primary Coarse Screen Feed Chest                                  | Old Corrugated Container, Area 191 | 191-2550    | Yes    | A.A.C.R18-2-101.57.j   |
| 122<br>SN-PRC1-M007 | OCC Bel-Shear Feed Chest  | Old Corrugated Container, Area 191 | 191-2550    | Yes    | A.A.C.R18-2-101.57.j   |
| 123 A               | Secondary Uniflow Cleaners Feed Tank                                  | Old Corrugated Container, Area 191 | 191-2704    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 123 B               | Secondary Posiflow Feed Chest   | Old Corrugated Container, Area 191 | 191-2730    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 123 C               | Decker Accept Chest   | Old Corrugated Container, Area 191 | 191-2757    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 123 D               | OCC Low Density Stock Tank  | Old Corrugated Container, Area 191 | 191-3111    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 123 E               | OCC High Density Stock Tank   | Old Corrugated Container, Area 191 | 191-1022    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 126<br>SN-PRC1-M011 | Tertiary Forward Cleaner Reject and Secondary Reverse Cleaners Reject | Old Corrugated Container, Area 191 | 191-2666    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 128<br>SN-PRC1-M013 | Sec. Posiflow Cleaner Rejects Tank                                    | Old Corrugated Container, Area 191 | 191-2720    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 134<br>SN-PRC1-S030 | OCC Building Area Vent  | Old Corrugated Container, Area 191 |             | Yes    | A.A.C.R18-2-101.57.j   |
| 134 A               | Junk Tower, #1 DI Pulper Standby use                                  | Old Corrugated Container, Area 191 | 191-1055    | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution. |
| 135<br>SN-PRC1-S031 | OCC North Building Area Vent  | Old Corrugated Container, Area 191 | 191-2720    | Yes    | A.A.C.R18-2-101.57.j   |
| 136<br>SN-PRC1-S032 | OCC North Building Area Vent  | Old Corrugated Container, Area 191 | 191-2720    | Yes    | A.A.C.R18-2-101.57.j   |
| 137<br>SN-PRC1-T019 | No. 1 Caustic Mix Tank  | Old Corrugated Container, Area 191 | 191-1526    | Yes    | A.A.C.R18-2-101.57.j   |
| 138<br>SN-PRC1-T020 | No. 2 Caustic Mix Tank  | Old Corrugated Container, Area 191 | 191-1533    | Yes    | A.A.C.R18-2-101.57.j   |
| 139<br>SN-PRC1-T021 | No. 1 Hydrogen Peroxide Tank  | Old Corrugated Container, Area 191 | 191-1550    | Yes    | A.A.C.R18-2-101.57.j   |
| 140<br>SN-PRC1-T022 | No.2 Hydrogen Peroxide Tank   | Old Corrugated Container, Area 191 | 191-1551    | Yes    | A.A.C.R18-2-101.57.j   |
| 141<br>SN-PRC1-T023 | No.1 D. I. Soap Storage Tank  | Old Corrugated Container, Area 191 | 191-1008    | Yes    | A.A.C.R18-2-101.57.j   |
| 142<br>SN-PRC1-V001 | No. 1 D. I. Pulper Vent   |                                    |             | Yes    | A.A.C.R18-2-101.57.j   |
| 143<br>SN-PRC1-V024 | OCC North Building Vent   | Old Corrugated Container, Area 191 |             | Yes    | A.A.C.R18-2-101.57.j   |

| S. No.              | ACTIVITY                               | Category                           | Equipment #  | Yes/No | Reason  |
|---------------------|--|------------------------------------|--|--------|---|
| 144<br>SN-PRC1-T025 | OCC North Building Vent                | Old Corrugated Container, Area 191 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 145<br>SN-PRC1-V026 | No. 2 Paper Machine Disc Saveall Vent  |                                    |  | Yes    | A.A.C.R18-2-101.57.j  |
| 146<br>SN-PRC1-V027 | OCC Decker Vent                        | Old Corrugated Container, Area 191 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 147<br>SN-PRC1-V028 | OCC South Building Area Vent           | Old Corrugated Container, Area 191 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 148<br>SN-PRC1-V029 | OCC South Building Area Vent           | Old Corrugated Container, Area 191 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 149<br>SN-PRC1-M006 | OCC Decker Filtrate Chest              | Old Corrugated Container, Area 191 |  | Yes    | A.A.C.R18-2-101.57.j  |
| 150<br>SN-PRC1-M007 | OCC Clarifier Water Chest              | Old Corrugated Container, Area 191 | 191-2711   | Yes    | A.A.C.R18-2-101.57.j  |
| 152<br>SN-PRC2-M009 | Clarifier Water Chest                  | #2 Deinking, Area 192              | 192-3224   | Yes    | A.A.C.R18-2-101.57.j  |
| 153<br>SN-PRC2-M010 | Clarifier Feed Chest                   | #2 Deinking, Area 192              | 192-3221   | Yes    | A.A.C.R18-2-101.57.j  |
| 157<br>SN-PRC2-M014 | Stillwell Tank                         | #2 Deinking, Area 192              | 192-3221   | Yes    | A.A.C.R18-2-101.57.j  |
| 160 A               | Tertiary Fine Screen Feed Tank         | #2 Deinking, Area 192              | 192-1530   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and fiber solution.  |
| 160 B               | #2 DI Junk Tower                       | #2 Deinking, Area 192              | 192-3018   | Yes    | A.A.C.R18-2-101.57.j<br>Contains large metal contaminates from the process, cans, wire and coins. |
| 160 C               | Coarse Screen Dilution Chest           | #2 Deinking, Area 192              | 192-3088   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water from paper fiber solution                                  |
| 160 D               | Beloit Cleaner Feed Chest              | #2 Deinking, Area 192              | 192-3095<br>Contains water from paper fiber solution | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |
| 160 E               | Secondary Fine Screen Dilution Chest   | #2 Deinking, Area 192              | 192-3097   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |
| 160 F               | Primary Fine Screen Dilution Chest     | #2 Deinking, Area 192              | 192-3112   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |
| 160 G               | Primary Coarse Screen Rejects Chest    | #2 Deinking, Area 192              | 192-3126<br>Contains water from paper fiber solution | Yes    | A.A.C.R18-2-101.57.j<br>Contains coarse rejects from the paper fiber solution                     |
| 160 H               | Cleaner Dilution Chest                 | #2 Deinking, Area 192              | 192-3131   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |
| 160 I               | GSC Flootation Dilution chest          | #2 Deinking, Area 192              | 192-3141   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |
| 160 J               | Secondary Forward Cleaner Rejects Tank | #2 Deinking, Area 192              | 192-3144   | Yes    | A.A.C.R18-2-101.57.j<br>Contains recycled water from the paper fiber solution                     |

| S. No. | ACTIVITY                               | Category              | Equipment #  | Yes/No | Reason  |
|--------|--|-----------------------|--|--------|---|
| 160 K  | Primary Forward Cleaner Rejects Tank   | #2 Deinking, Area 192 | 192-3095   | Yes    | A.A.C.R18-2-101.57.j<br>Contains rejects from the water and paper fiber solution. |
| 160 L  | Tertiary Forward Cleaner Rejects Chest | #2 Deinking, Area 192 | 192-3153<br>Contains water from paper fiber solution | Yes    | A.A.C.R18-2-101.57.j<br>Contains rejects from the water and paper fiber solution. |
| 160 M  | Secondary Stage Washer                 | #2 Deinking, Area 192 | 192-3177   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water from the paper fiber solution              |
| 161 A  | Dewirer Machine                        | #2 Deinking, Area 192 | 192-1501   | Yes    | A.A.C.R18-2-101.57.j<br>Contains wire on bales of paper.                          |
| 161 B  | Bale Breaker                           | #2 Deinking, Area 192 | 192-1505   | Yes    | A.A.C.R18-2-101.57.j  |
| 161 C  | Pulper                                 | #2 Deinking, Area 192 | 192-1509   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water paper fiber solution                       |
| 161 D  | Vat Pulper (2)                         | #2 Deinking, Area 192 | 192-1046<br>192-3009                                 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 161E   | High Density Cleaners (4)              | #2 Deinking, Area 192 | 192-3026<br>192-3027<br>192-1510<br>192-1510         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water from the paper fiber solution              |
| 161 F  | Vibrating Screens (2)                  | #2 Deinking, Area 192 | 192-3040<br>192-3043                                 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 161 G  | Barrier Screen                         | #2 Deinking, Area 192 | 192-3030   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 161 H  | Primary Coarse Screen                  | #2 Deinking, Area 192 | 192-3117   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 162 A  | Secondary Coarse Screen                | #2 Deinking, Area 192 | 192-3120   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 162 B  | Tertiary Coarse Screen                 | #2 Deinking, Area 192 | 192-3174   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 162 C  | GSC Floatation Cell                    | #2 Deinking, Area 192 | 192-1513   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 162 D  | Reverse Cleaners (3 Stages)            | #2 Deinking, Area 192 | 192-1514<br>192-1518<br>192-1519<br>192-1516         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |
| 162 E  | Forward Cleaners (4 Stages)            | #2 Deinking, Area 192 | 192-3117   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution                   |

| S. No.              | ACTIVITY                               | Category                 | Equipment #  | Yes/No | Reason   |
|---------------------|--|--------------------------|--|--------|--|
| 162 F               | Fine Screens (4 stages)                | #2 Deinking, Area<br>192 | 192-1521<br>192-1522<br>192-1523<br>192-1550<br>192-1551<br>192-3413 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 162 G               | Deckers (6)                            | #2 Deinking, Area<br>192 | 192-3156<br>192-3159<br>192-3162<br>192-3165<br>192-3255<br>192-3258 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 162 H               | Predrainer (6)                         | #2 Deinking, Area<br>192 | 192-3184<br>192-3191<br>192-3198<br>192-3205<br>192-3212<br>192-3331 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 162 I               | WEMCO Flootation Cell (4)              | #2 Deinking, Area<br>192 | 192-3840<br>192-3850<br>192-3860<br>192-3870                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 162 J               | WEMCO Flootation Cell                  | #2 Deinking, Area<br>192 | 192-3880   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 162 K               | Clarifier                              | #2 Deinking, Area<br>192 | 192-1524   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 163<br>SN-PRC2-M036 | Borol Water Surge Tank                 | #2 Deinking, Area<br>192 | 192-2118   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 164<br>SN-PRC2-M037 | Borol Degas Tank                       | #2 Deinking, Area<br>192 | 192-2130   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 165<br>SN-PRC2-M038 | Borol Hydrosulfite Bleach<br>Tank      | #2 Deinking, Area<br>192 | 192-2145   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 166<br>SN-PRC2-S002 | No. 2 D. I. South Building<br>Wall Fan | #2 Deinking, Area<br>192 |  | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 167<br>SN-PRC2-S003 | No. 2 D. I. South Building<br>Wall Fan | #2 Deinking, Area<br>192 |  | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 168<br>SN-PRC2-S004 | No. 2 D. I. South Building<br>Wall Fan | #2 Deinking, Area<br>192 |  | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 170<br>SN-PRC2-T005 | No. 2 D. I. Pulper Dump<br>Chest       | #2 Deinking, Area<br>192 | 192-3044   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 171<br>SN-PRC2-T020 | Sodium Bisulfite Storage<br>Tank       | #2 Deinking, Area<br>192 | 192-2160   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 172<br>SN-PRC2-T021 | DTPA Storage Tank                      | #2 Deinking, Area<br>192 | 192-3269   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |

| S. No.              | ACTIVITY  | Category                 | Equipment #  | Yes/No | Reason   |
|---------------------|---|--------------------------|--|--------|--|
| 174<br>SN-PRC2-T023 | Silicate Storage Tank   | #2 Deinking, Area<br>192 | 192-3278   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 175<br>SN-PRC2-T024 | No. 2 D. I. Soap Storage<br>Tank                                      | #2 Deinking, Area<br>192 | 192-3283   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 176<br>SN-PRC2-T025 | Poly I Storage Tank   | #2 Deinking, Area<br>192 | 192-3291   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 177<br>SN-PRC2-T026 | Poly II Make up Tank  | #2 Deinking, Area<br>192 | 192-3297   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 183<br>SN-PRC2-T032 | Borol Solution Storage Tank   | #2 Deinking, Area<br>192 | 192-2101   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 184<br>SN-PRC2-V001 | No. 2 D. I. South Building<br>Area Vent                               | #2 Deinking, Area<br>192 |  | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 185<br>SN-PRC2-V039 | No. 2 D. I. Restroom Fan  | #2 Deinking, Area<br>192 |  | Yes    | A.A.C.R18-2-101.57.j   |
| 186<br>SN-PRC3-M003 | Primary Screen Rejects Tank   | #3 Deinking, Area<br>194 | 194-0315   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water from<br>Deinking process.   |
| 187<br>SN-PRC3-M004 | No. 3D.I. Fine Screen<br>Dilution Tank                                | #3 Deinking, Area<br>194 | 194-0180   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water from<br>deinking process.   |
| 188<br>SN-PRC3-M005 | Clear Filtrate Chest<br>Cloudy Filtrate Chest<br>Cloudy Filtrate Tank | #3 Deinking, Area<br>194 | 194-0415<br>194-0420<br>194-0052                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189<br>SN-PRC3-M006 | High Density Stock Chest  | #3 Deinking, Area<br>194 | 194-0001   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189 A               | High Density Cleaner<br>Transfer                                      | #3 Deinking, Area<br>194 | 194-0087   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189 B               | Medium Density Cleaner<br>Transfer                                    | #3 Deinking, Area<br>194 | 194-0137   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189 C               | High Density Cleaners (6, 3<br>used at any one time)                  | #3 Deinking, Area<br>194 | 194-0140<br>194-0145<br>194-0150<br>194-0155<br>194-0160<br>194-0165 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189 D               | Coarse Screens (3 stages)   | #3 Deinking, Area<br>194 | 194-0115<br>194-0120<br>194-0335<br>194-0345                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |
| 189 E               | Forward Cleaners (4 Stages)   | #3 Deinking, Area<br>194 | 194-0520<br>194-0523<br>194-0524<br>194-0515                         | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper<br>fiber solution |

| S. No.              | ACTIVITY                                  | Category                           | Equipment #  | Yes/No | Reason  |
|---------------------|---|------------------------------------|--|--------|---|
| 189 F               | Reverse Cleaners                          | #3 Deinking, Area 194              | 194-0215<br>194-0220<br>194-0225<br>194-0230<br>194-0235<br>194-0240<br>194-0255 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 189 G               | Fine Screens (3 Stages)                   | #3 Deinking, Area 194              | 194-0170<br>194-0528<br>194-0529<br>194-0175<br>194-0190<br>194-0200             | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 189 H               | Disk Thickener                            | #3 Deinking, Area 194              | 194-0260   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190<br>SN-PRC3-M007 | High Density Stock Surge Chest            | #3 Deinking, Area 194              | 194-0007   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190 A               | Primary Forward Cleaner Chest             | #3 Deinking, Area 194              | 194-0100   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190 B               | Thick Stock Pump Standpipe                | #3 Deinking, Area 194              | 194-0300   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190 C               | #2 & #3 Deinking Fine Screen Rejects Tank | #3 Deinking, Area 194              | 194-0375   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190 D               | #1 to 4 GSC Flootation Cells              | #3 Deinking, Area 194              | 194-0054<br>194-0055<br>194-0056<br>194-0057                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 190 E               | GSC Flootation Cell Reject Tank           | #3 Deinking, Area 194              | 194-0051   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 191<br>SN-PRC3-T002 | Pulper Dump Chest                         | #2 Deinking, Area 192              | 192-0100   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192<br>SN-PRC3-V001 | Waste Corrugated Pulper Vent              | Waste Corrugated Area 193          | 193-2042   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 A               | Waste Corrugated Pulper Feed Conveyor     | Corrugated Waste, Area 193         | 193-2030   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 B               | Turbo Separator                           | Corrugated Waste, Area 193         | 193-2180   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 C               | OCC #2 Conveyor                           | Old Corrugated Container, Area 191 | 194-0015   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 D               | OCC #2 Pulper                             | Old Corrugated Container, Area 191 | 194-0020   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 E               | Detrasher                                 | Old Corrugated Container, Area 191 | 194-0075   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |

| S. No. | ACTIVITY                   | Category                           | Equipment #  | Yes/No | Reason  |
|--------|----------------------------|------------------------------------|--|--------|---|
| 192 F  | High Density Cleaners, (2) | Old Corrugated Container, Area 191 | 194-0090<br>194-0095                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 G  | Primary Coarse Screen      | Old Corrugated Container, Area 191 | 191-2564   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 H  | Secondary Coarse Screen    | Old Corrugated Container, Area 191 | 191-2568   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 I  | Tertiary Coarse Screen     | Old Corrugated Container, Area 191 | 191-0504   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 J  | Detrashing Screen          | Old Corrugated Container, Area 191 | 191-0542   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 K  | Quaternary Cleaner         | Old Corrugated Container, Area 191 | 191-0526   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 L  | Primary Fine Screens (2)   | Old Corrugated Container, Area 191 | 191-2602<br>191-2605                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 M  | Secondary Fine Screen      | Old Corrugated Container, Area 191 | 194-0015   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 N  | Tertiary Fine Screen       | Old Corrugated Container, Area 191 | 191-0508   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 O  | Primary Reverse Cleaners   | Old Corrugated Container, Area 191 | 191-2700<br>191-2701<br>191-2702<br>191-2703<br>191-0509 | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 P  | Secondary Reverse Cleaners | Old Corrugated Container, Area 191 | 191-2710   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 Q  | Primary Forward Cleaners   | Old Corrugated Container, Area 191 | 191-2716<br>191-2717<br>191-2718<br>191-2719             | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 R  | Secondary Forward Cleaners | Old Corrugated Container, Area 191 | 191-0510   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 S  | Tertiary Forward Cleaners  | Old Corrugated Container, Area 191 | 191-2726   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 T  | Deckers                    | Old Corrugated Container, Area 191 | 191-1242<br>191-1247<br>191-1252<br>191-1256             | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 U  | Deckers #5                 | Old Corrugated Container, Area 191 | 191-2752   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |
| 192 V  | Clarifier                  | Old Corrugated Container, Area 191 | 194-1275   | Yes    | A.A.C.R18-2-101.57.j<br>Contains water and paper fiber solution |



| S. No.              | ACTIVITY                                | Category              | Equipment #                                  | Yes/No | Reason  |
|---------------------|---|-----------------------|--|--------|---|
| 193<br>SN-PSG0-M001 | Condensate Blow Down Tank               | Power House, Area 411 | 411-1111                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate and steam from the boilers. |
| 194<br>SN-PSG0-M002 | Condensate Blow down Flash Tank         | Power House, Area 411 | 411-1112                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate and steam from the boilers. |
| 195<br>SN-PSG0-M003 | Unload Blow Down Flash Tank             | Power House, Area 412 | 412-6321                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate and steam from the boilers. |
| 195 A               | Ash Sluice Tank                         | Power House, Area 412 | 412-3001                                     |        | A.A.C.R18-2-101.57.j  |
| 196 A               | Deaerator Heater                        | Power House, Area 442 | 442-1050                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate and steam from the boilers. |
| 196 B               | Deaerator Heater                        | Power House, Area 442 | 442-1306                                     | Yes    | A.A.C.R18-2-101.57.j<br>Contains condensate and steam from the boilers. |
| 199<br>SN-PSG0-M018 | No.2 Power Boiler Scrubber Recycle Tank | Power House, Area 412 | 412-3092                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 A               | PH Sample Pot                           | Power House, Area 412 | 412-3091                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 B               | Soda Ash Silo                           | Power House, Area 412 | 412-3110                                     | No     | A.A.C. R18-2-730  |
| 199 C               | Dilution Tank                           | Power House, Area 412 | 412-3118                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 D               | Reagent Solution Storage Tank           | Power House, Area 412 | 412-3119                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 E               | SO <sub>2</sub> Scrubber absorber       | Power House, Area 412 | 412-3141                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 F               | Clarifier Overflow Surge Tank           | Power House, Area 412 | 412-3146                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 199 G               | SO <sub>2</sub> Scrubber absorber       | Power House, Area 412 | 442-3089                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 200<br>SN-PSG0-M019 | Condensate Collection Tank              | Power House, Area 442 | 442-1400                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 201 A               | #1 Demineralized Water Storage Tank     | Power House, Area 442 | 442-1330                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 201 B               | #2 Demineralized Water Storage Tank     | Power House, Area 442 | 442-1310                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 202<br>SN-PSG0-M023 | Bearing Water Collection Tank           | Power House, Area 442 | 442-1186                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 203<br>SN-PSG0-T004 | No. 1 Weak Base Anion                   | Power House, Area 442 | 442-1150<br>Sealed Pressure vessel           | Yes    | A.A.C.R18-2-101.57.j  |
| 204<br>SN-PSG0-T005 | No. 2 Weak Base Anion                   | Power House, Area 442 | 442-1151                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 205<br>SN-PSG0-T006 | Reclaimed Caustic Tank                  | Power House, Area 442 | 442-1155                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 206<br>SN-PSG0-T007 | No. 1 Weak Acid Cation Tank             | Power House, Area 442 | 442-1160                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 207<br>SN-PSG0-T008 | No. 2 Weak Acid Cation Tank             | Power House, Area 442 | 442-1161                                     | Yes    | A.A.C.R18-2-101.57.j  |
| 209<br>SN-PSG0-T011 | Cation Demineralizer Tank (4)           | Power House, Area 442 | 442-1350<br>442-1351<br>442-1352<br>442-1349 | Yes    | A.A.C.R18-2-101.57.j  |

| S. No.              | ACTIVITY  | Category                 | Equipment #                                  | Yes/No | Reason               |
|---------------------|---|--------------------------|--|--------|----------------------|
| 210<br>SN-PSG0-T012 | Anion Demineralizer Tank  | Power House, Area<br>442 | 442-1353<br>442-1354<br>442-1355<br>442-1356 | Yes    | A.A.C.R18-2-101.57.j |
| 211<br>SN-PSG0-T013 | Chemical Feed Tank ( #1<br>Boiler Feed Water)   | Power House, Area<br>442 | 442-1100                                     | Yes    | A.A.C.R18-2-101.57.j |
| 212<br>SN-PSG0-T014 | Sulfuric Acid Storage Tank  | Power House, Area<br>442 | 442-1300                                     | Yes    | A.A.C.R18-2-101.57.j |
| 214<br>SN-PSG0-T020 | No.1 Caustic Storage Tank   | Power House, Area<br>442 | 442-1301                                     | Yes    | A.A.C.R18-2-101.57.j |
| 215<br>SN-PSG0-T021 | No.2 Caustic Storage Tank   | Power House, Area<br>442 | 442-1302                                     | Yes    | A.A.C.R18-2-101.57.j |
| 216<br>SN-PSG2-S003 | No. 2 Power Boiler By-Pass<br>Stack   |                          |  | No     | 40 CFR 60 Subpart D  |
| 217<br>SN-PSG2-T016 | No. 2 Power Boiler Chemical<br>Feed Tank  | Power House, Area<br>442 | 442-1104                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 A               | Phosphate Feed Tank   | Power House, Area<br>442 | 442-1303                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 B               | Lube Oil Tank   | Power House, Area<br>451 | 451-1005                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 C               | Oil Reservoir Tank  | Power House, Area<br>452 | 452-1005                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 D               | Hydraulic Oil Reservoir<br>Tank   | Power House, Area<br>452 | 452-1038                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 E               | Steam Driven turbine Engine   | Power House, Area<br>451 | 451-1001                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 F               | Steam Driven Turbine<br>Engine  | Power House, Area<br>452 | 452-1001                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 G               | Electrical Generator Driven<br>by Steam Turbine, no<br>emission                           | Power House, Area<br>451 | 451-1003                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 H               | Electrical Generator Driven<br>by Steam Turbine, no<br>emissions                          | Power House, Area<br>452 | 452-1003                                     | Yes    | A.A.C.R18-2-101.57.j |
| 217 I               | Coal Silo #1<br>Coal Silo #2<br>Coal Silo #3<br>Coal Silo #4<br>Sealed units, no emission | Power House, Area<br>412 | 412-2000<br>412-2001<br>412-2002<br>412-2003 | No     | A.A.C. R18-2-716     |
| 217 J               | Coal Pulverizer #1<br>Coal Pulverizer #2<br>Coal Pulverizer #3<br>Coal Pulverizer #4      | Power House, Area<br>412 | 412-2040<br>412-2047<br>412-2054<br>412-2061 | No     | A.A.C. R18-2-716     |
| 217 K               | Water Sprays  | Power House, Area<br>412 | 412-1120                                     | No     | A.A.C. R18-2-716     |
| 218<br>SN-WWT1-S004 | No. 1 Diesel Fire Pump<br>Exhaust<br>No. 2 Diesel Fire Pump<br>Exhaust                    |                          |  | No     | A.A.C.R18-2-719      |
| 218 A               | Elevated fire Tower Water<br>Tank   | Power House, Area<br>464 | 464-1001                                     | Yes    | A.A.C.R18-2-101.57.j |
| 219<br>SN-WWT1-T001 | No. 1 Mill Fresh Water Tank   | Power House, Area<br>463 | 463-1001                                     | Yes    | A.A.C.R18-2-101.57.j |
| 220<br>SN-WWT1-T002 | No.2 Mill Fresh Water Tank  | Power House, Area<br>463 | 463-1003                                     | Yes    | A.A.C.R18-2-101.57.j |

| S. No.              | ACTIVITY   | Category                              | Equipment #          | Yes/No | Reason               |
|---------------------|--|---------------------------------------|----------------------|--------|----------------------|
| 221<br>SN-WWT1-T003 | Phosphate Mix Tank                                   | Power House, Area<br>463              | 463-1005             | Yes    | A.A.C.R18-2-101.57.j |
| 222<br>SN-WWT2-M012 | DAF Polymer Feed Tank                                | Waste Water<br>Treatment, Area<br>482 | 482-2023             | Yes    | A.A.C.R18-2-101.57.j |
| 223<br>SN-WWT2-M013 | Belt Press Polymer Feed<br>Tank                      | Waste Water<br>Treatment, Area<br>482 | 482-2024             | Yes    | A.A.C.R18-2-101.57.j |
| 223 A               | DAF Cell I   | Waste Water<br>Treatment, Area<br>482 | 482-1300             | No     | A.A.C.R18-2-730      |
| 223 B               | DAF I Retention Tank                                 | Waste Water<br>Treatment, Area<br>482 | 482-1321             | No     | A.A.C.R18-2-730      |
| 223 C               | DAF I Sludge Transfer Tank                           | Waste Water<br>Treatment, Area<br>482 | 482-1322             | No     | A.A.C.R18-2-730      |
| 223 D               | DAF Cell II Tank                                     | Waste Water<br>Treatment, Area<br>482 | 482-1400             | No     | A.A.C.R18-2-730      |
| 223 E               | DAF II Retention Tank                                | Waste Water<br>Treatment, Area<br>482 | 482-1421             | No     | A.A.C.R18-2-730      |
| 223 F               | DAF II Transfer Tank                                 | Waste Water<br>Treatment, Area<br>482 | 482-1422             | No     | A.A.C.R18-2-730      |
| 223 G               | Sludge Collection Tank                               | Waste Water<br>Treatment, Area<br>482 | 482-1521             | No     | A.A.C.R18-2-730      |
| 224<br>SN-WWT2-S021 | No. 1 Sludge Press                                   | Waste Water<br>Treatment, Area<br>482 | 482-1600             | No     | A.A.C.R18-2-730      |
| 225<br>SN-WWT2-S021 | No. 2 Sludge Press                                   | Waste Water<br>Treatment, Area<br>482 | 482-1700             | No     | A.A.C.R18-2-730      |
| 226<br>SN-WWT2-S022 | No. 3 Sludge Press Vent                              | Waste Water<br>Treatment, Area<br>482 | 482-1800             | No     | A.A.C.R18-2-730      |
| 226 A               | Primary Catenary Screen<br>Secondary Catenary Screen | Waste Water<br>Treatment, Area<br>482 | 482-1151<br>482-1152 | No     | A.A.C.R18-2-730      |
| 227<br>SN-WWT2-T009 | Sulfuric Acid Tank (2)                               | Waste Water<br>Treatment, Area<br>482 | 482-1930             | Yes    | A.A.C.R18-2-101.57.j |
| 228<br>SN-WWT2-T010 | DAF Polymer Storage Tank                             | Waste Water<br>Treatment, Area<br>482 | 482-2021             | Yes    | A.A.C.R18-2-101.57.j |
| 229<br>SN-WWT2-T011 | BP Polymer Storage Tank                              | Waste Water<br>Treatment, Area<br>482 | 482-2022             | Yes    | A.A.C.R18-2-101.57.j |
| 230<br>SN-WWT2-T014 | Instrument Air Receiver                              | Waste Water<br>Treatment, Area<br>482 | 482-2122             | Yes    | A.A.C.R18-2-101.57.j |
| 230 A               | Flocculation Tank                                    | Waste Water<br>Treatment, Area<br>482 | 482-1210             | Yes    | A.A.C.R18-2-101.57.j |

| S. No.              | ACTIVITY                   | Category | Equipment # | Yes/No | Reason          |
|---------------------|----------------------------|----------|-------------|--------|-----------------|
| 231<br>SN-WWT2-V015 | No. 1 Mill Sewer line Vent |          |             | No     | A.A.C.R18-2-730 |
| 232<br>SN-WWT2-V016 | No. 2 Mill Sewer Line Vent |          |             | No     | A.A.C.R18-2-730 |
| 233<br>SN-WWT2-V017 | No. 3 Mill Sewer Line Vent |          |             | No     | A.A.C.R18-2-730 |

## XII. LIST OF ABBREVIATIONS

|                  |   |
|------------------|---|
| A.A.C.           | Arizona Administrative Code   |
| ADEQ             | Arizona Department of Environmental Quality                             |
| CAM              | Compliance Assurance Monitoring   |
| CEMS             | Continuous Emissions Monitoring System                                  |
| CO               | Carbon Monoxide   |
| COMS             | Continuous Opacity Monitoring System                                    |
| CPSI             | Catalyst Paper (Snowflake) Inc.   |
| ESP              | Electrostatic Precipitator  |
| HAP              | Hazardous Air Pollutant   |
| MACT             | Maximum Achievable Control Technology                                   |
| MMBtu/hr         | Million British Thermal Units per Hour                                  |
| MSDS             | Material Safety Data Sheets   |
| NESHAP           | National Emission Standard for Hazardous Air Pollutants                 |
| NO <sub>x</sub>  | Nitrogen Oxides   |
| NOV              | Notice of Violation   |
| NSPS             | New Source Performance Standards  |
| PM               | Particulate Matter  |
| PM <sub>10</sub> | Particulate Matter with an Aerodynamic Diameter of less than 10 microns |
| PTE              | Potential to Emit   |
| QA/QC            | Quality Assurance / Quality Control                                     |
| SO <sub>2</sub>  | Sulfur Dioxide  |
| TPY              | Tons per Year   |
| VOC              | Volatile Organic Compounds  |